

Draft for Comment



U.S. NUCLEAR REGULATORY COMMISSION **DESIGN-SPECIFIC REVIEW STANDARD FOR NuScale SMR DESIGN**

3.5.1.2 INTERNALLY-GENERATED MISSILES (INSIDE CONTAINMENT)

REVIEW RESPONSIBILITIES

Primary - Organization responsible for review of the plant design for protection of structures, systems, and components from internal and external hazards

Secondary - None

I. AREAS OF REVIEW

Title 10 of the *Code of Federal Regulations* (CFR), Part 50, Appendix A, General Design Criterion (GDC) 4 requires that all structures, systems, and components (SSCs) important to safety shall be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss of coolant accidents. GDC 4 also requires that such SSCs are appropriately protected against dynamic effects, including the effects of missiles, pipe whipping, and discharging fluids that may result from equipment failures and from events and conditions inside containment. The section of the staff's review includes protection of such SSCs from internally-generated missiles from component overspeed failures, missiles that could originate from high-energy fluid system failures, and missiles caused by or as a consequence of gravitational effects.

All SSCs important to safety and those categorized as Regulatory Treatment of Non-Safety Systems (RTNSS) Category B SSCs outside containment, are subject to missile protection. For the purpose of brevity in this section, important-to-safety and RTNSS-B SSCs will be designated as "SSCs subject to missile protection." SRP 19.3 describes how SSCs are determined to be RTNSS-B.

The specific areas of review are as follows:

1. Protection from internally-generated missiles (inside containment), including identification of structures, systems or portions of systems, components and the methods of protection provided. Determination of the potential of pressurized components and systems for generating missiles such as valve bonnets and hardware-retaining bolts, relief valve parts, and instrument wells. If applicable, determination of the potential of high-speed rotating machinery for generating missiles from component overspeed or such failures from pump component, and other rotating equipment (e.g., impellers and fan blades).
2. Internal missile effects on SSCs that are not safety-related but that could affect an intended safety function of the SSCs subject to missile protection.
3. Plausible secondary missiles generated as a result of impact with primary missiles.

4. Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC). For design certification (DC) and combined license (COL) reviews, the staff reviews the applicant's proposed ITAAC associated with the SSCs related to this DSRS section in accordance with SRP Section 14.3, "Inspections, Tests, Analyses, and Acceptance Criteria". The staff recognizes that the review of ITAAC cannot be completed until after the rest of this portion of the application has been reviewed against acceptance criteria contained in this DSRS section. Furthermore, the staff reviews the ITAAC to ensure that all SSCs in this area of review are identified and addressed as appropriate in accordance with SRP Section 14.3.
5. COL Information Items and Certification Requirements and Restrictions. For a DC application, the review will also address COL information items and requirements and restrictions (e.g., interface requirements and site parameters).

For a COL application referencing a DC, a COL applicant must address COL information items (referred to as COL license information in certain DCs) included in the referenced DC. Additionally, a COL applicant must address requirements and restrictions (e.g., interface requirements and site parameters) included in the referenced DC.

Review Interfaces

Other DSRS sections interface with this section as follows:

1. Review of the acceptability of the analytical procedures and criteria for structures or barriers that protect the containment vessel, essential systems, and SSCs subject to missile protection from internally-generated missiles is performed under DSRS Section 3.5.3. The results of this review can be utilized to complete the overall evaluation of the protection against internally-generated missiles.
2. Review of dynamic effects associated with the postulated rupture of piping inside the containment is performed under SRP Section 3.6.2. Typically included in SRP Section 3.6.2 is the review of any high-energy line spatial separation analyses by an applicant. The results of this review can be utilized to complete the overall evaluation of the protection against internally-generated missiles.
3. Review of the regulatory treatment of non-safety systems is performed under Standard Review Plan (SRP) Section 19.3, as related to augmented design standards for missile protection for risk significant SSCs that are not safety-related.
4. Review of the classification of safety-related SSCs is performed under SRP Section 3.2.2.

The specific acceptance criteria and review procedures are contained in the reference DSRS and SRP sections.

II. ACCEPTANCE CRITERIA

Requirements

Acceptance criteria are based on meeting the relevant requirements of the following Commission regulations:

1. 10 CFR Part 50, Appendix A, GDC 4 Environmental and Dynamic Effects Design Bases.

2. 10 CFR 52.47(b)(1), which requires that a DC application contain the proposed ITAAC that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the DC has been constructed and will be operated in conformity with the DC, the provisions of the Atomic Energy Act (AEA), and the U.S. Nuclear Regulatory Commission's (NRC's) regulations.
3. 10 CFR 52.80(a), which requires that a COL application contain the proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will operate in conformity with the COL, the provisions of the AEA, and the NRC's regulations.

DSRS Acceptance Criteria

Specific DSRS acceptance criteria acceptable to meet the relevant requirements of the NRC's regulations identified above are set forth below. The DSRS is not a substitute for the NRC's regulations, and compliance with it is not required. As an alternative, and as described in more detail below, an applicant may identify the differences between a DSRS section and the design features (DC and COL applications only), analytical techniques, and procedural measures proposed in an application and discuss how the proposed alternative provides an acceptable method of complying with the NRC regulations that underlie the DSRS acceptance criteria.

The design of the SSCs subject to missile protection is acceptable if the integrated design affords protection from the internally-generated missiles (inside containment) that may result from equipment failure, in order to maintain their safety functions in accordance with GDC 4.

1. The applicant's assertion of the statistical significance of an identified missile can be evaluated by a probability analysis. The statistical significance for a potential missile is determined by calculating the probability of missile occurrence. If this probability is less than 10^{-7} per year, the missile is not considered significant. If the probability of occurrence is greater than 10^{-7} per year, the probability that it will impact a significant target is determined. If the product of these two probabilities is less than 10^{-7} per year, the missile is not considered significant. If the product is greater than 10^{-7} per year, the probability of significant damage is determined. If the combined probability (product of all three) is less than 10^{-7} per year, the missile is not considered significant. If the combined probability is greater than 10^{-7} per year, missile protection of SSCs subject to missile protection, and of nonsafety-related SSCs whose failure could affect an intended safety function of an SSC subject to missile protection, should be provided by one or more of the six methods listed below.
2. The missile protection for SSCs subject to missile protection is adequate if provided by one or more of the following methods: (1) locating the system or component in a missile-proof structure, (2) separating redundant systems or components for the missile path or range, (3) providing shields and barriers for systems and components, (4) designing the equipment to withstand the impact of the most damaging missile, (5) providing design features to prevent the generation of missiles, or (6) orienting missile sources to prevent missiles from striking SSCs subject to missile protection.

Technical Rationale

The technical rationale for application of these acceptance criteria to the areas of review addressed by this DSRS section is discussed in the following paragraphs:

1. 10 CFR Part 50, Appendix A, GDC 4 establishes requirements for the ability of SSCs important to safety to be protected from dynamic effects, including the effects of internally-generated missiles. Equipment inside the containment like pressurized components, high-energy piping, and rotating equipment all have a potential for generating credible missiles. An internally-generated missile has a dynamic effect and its impact on SSCs important to safety must be evaluated to ensure that they are protected adequately and will be capable of performing their safety functions. Protecting SSCs important to safety from the adverse effects of internally-generated missiles prevents both failure of systems required for safe shutdown of the reactor facility and significant uncontrolled release of radioactivity.

III. REVIEW PROCEDURES

These review procedures are based on the identified DSRS acceptance criteria. For deviations from these acceptance criteria, the staff should review the applicant's evaluation of how the proposed alternatives provide an acceptable method of complying with the relevant NRC requirements identified in Subsection II.

1. Selected Programs and Guidance - In accordance with the guidance in NUREG-0800, "Introduction - Part 2: Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: Integral Pressurized Water Reactor Edition" (NUREG-0800 Intro Part 2) as applied to this DSRS Section, the staff will review the information proposed by the applicant to evaluate whether it meets the acceptance criteria described in Subsection II of this DSRS. As noted in NUREG-0800 Intro Part 2, the NRC requirements that must be met by an SSC do not change under the SMR framework. Using the graded approach described in NUREG-0800 Intro Part 2, the NRC staff may determine that, for certain structures, systems, and components (SSCs), the applicant's basis for compliance with other selected NRC requirements may help demonstrate satisfaction of the applicable acceptance criteria for that SSC in lieu of detailed independent analyses. The design-basis capabilities of specific SSCs would be verified where applicable as part of completion of the applicable ITAAC. The use of the selected programs to augment or replace traditional review procedures is described in Figure 1 of NUREG-0800, Introduction - Part 2. Examples of such programs that may be relevant to the graded approach for these SSCs include:

- 10 CFR Part 50, Appendix A, General Design Criteria (GDC), Overall Requirements, Criteria 1 through 5
- 10 CFR Part 50, Appendix B, Quality Assurance (QA) Program
- 10 CFR 50.49, Environmental Qualification of Electrical Equipment (EQ) Program
- 10 CFR 50.55a, Code Design, Inservice Inspection and Inservice Testing (ISI/IST) Programs
- 10 CFR 50.65, Maintenance Rule requirements
- Reliability Assurance Program (RAP)
- 10 CFR 50.36, Technical Specifications

- Availability Controls for SSCs Subject to Regulatory Treatment of Non-Safety Systems (RTNSS)
- Initial Test Program (ITP)
- Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)

This list of examples is not intended to be all-inclusive. It is the responsibility of the technical reviewers to determine whether the information in the application, including the degree to which the applicant seeks to rely on such selected programs and guidance, demonstrates that all acceptance criteria have been met to support the safety finding for a particular SSC.

2. In accordance with 10 CFR 52.47(a)(8),(21), and (22), and 10 CFR 52.79(a)(17), (20) and (37), for design certification or combined license applications submitted under Part 52, the applicant is required to (1) address the proposed technical resolution of unresolved safety issues and medium- and high-priority generic safety issues which are identified in the version of NUREG 0933 current on the date up to 6 months before the docket date of the application and which are technically relevant to the design; (2) demonstrate how the operating experience insights have been incorporated into the plant design; and, (3) provide information necessary to demonstrate compliance with any technically relevant portions of the Three Mile Island requirements set forth in 10 CFR 50.34(f), except paragraphs (f)(1)(xii), (f)(2)(ix), and (f)(3)(v) for a DC application, and except paragraphs (f)(1)(xii), (f)(2)(ix), (f)(2)(xxv), and (f)(3)(v) for a COL application. These cross-cutting review areas should be addressed by the reviewer for each technical subsection and relevant conclusions documented in the corresponding safety evaluation report (SER) section.
3. The reviewer determines whether an SSC performs a safety-related function or a RTNSS B function; if so, it should be protected against internally-generated missiles. DSRS Section 3.2.2 and SRP Section 19.3, as related to augmented design standards, provide additional guidance on the identification of SSCs subject to missile protection. SSCs that meet this criterion or by their failure could have adverse effects on safety functions should be protected from the effects of internally-generated missiles. Review of the effects of internally-generated missiles on structures is a primary responsibility under SRP Section 3.5.3.
4. A review is conducted of the information provided in the DC and COL applications related to SSCs, design bases, and criteria, the listing of plausible primary and secondary missiles, damage to or failure of SSCs subject to missile protection as a result of missile impingement, and missile protection capability. The reviewer may use failure mode and effect analyses and the results of reviews by other branches (see Review Interfaces) in evaluating SSCs to identify those requiring protection from internally-generated missiles, the origins of possible missiles, and the adequacy of the protection.
5. The reviewer determines whether controls ensure that unsecured maintenance equipment, including equipment required for maintenance and equipment undergoing maintenance, will be removed from containment prior to operation or moved to a location where it is not a potential hazard to SSCs subject to missile protection.
6. The reviewer determines whether the separation analysis can demonstrate adequate protection for SSCs subject to missile protection from missiles that may be generated inside the containment. The reviewer should utilize the results of any high-energy line

separation analysis review in this evaluation. If an applicant uses spatial separation as adequate protection from missiles inside the containment, that evaluation should be consistent with the applicant's use of spatial separation for high-energy line breaks. If damage can occur to only one division of SSCs to missile protection, the requirement for separation of redundant equipment is met. If more than one division can be damaged by high-energy piping, then barriers, shields, and enclosures must be utilized to protect SSCs subject to missile protection.

7. For review of a DC application, the reviewer should follow the above procedures to verify that the design, including requirements and restrictions (e.g., interface requirements and site parameters), set forth in the final safety analysis report (FSAR) meets the acceptance criteria. DCs have referred to the FSAR as the design control document (DCD). The reviewer should also consider the appropriateness of identified COL information items. The reviewer may identify additional COL information items; however, to ensure these COL information items are addressed during a COL application, they should be added to the DC FSAR.

For review of a COL application, the scope of the review is dependent on whether the COL applicant references a DC, an early site permit or other NRC approvals (e.g., manufacturing license, site suitability report or topical report).

For review of both DC and COL applications, SRP Section 14.3 should be followed for the review of ITAAC. The review of ITAAC cannot be completed until after the completion of this section.

IV. EVALUATION FINDINGS

The reviewer verifies that the applicant has provided sufficient information and that the review and calculations (if applicable) support conclusions of the following type to be included in the staff's SER. The reviewer also states the bases for those conclusions.

The review of possible effects of internally-generated missiles (inside containment) included SSCs whose failure could prevent safe shutdown of the plant or result in significant uncontrolled releases of radioactivity. The staff's review concluded that the applicant's design bases and criteria for SSCs subject to missile protection necessary to maintain a safe plant shutdown meet 10 CFR Part 50, Appendix A, GDC 4 requirements for protection of SSCs important to safety, since the applicant:

1. Has used methods for identifying potential sources of internal missiles and for demonstrating the adequacy of the protection provided which have been reviewed and found acceptable by the staff in this application or in previous applications;
2. Has shown that the functions of SSCs subject to missile protection will be protected from internally-generated missiles (inside containment) by: (1) locating the system or component in a missile-proof structure, (2) separating redundant systems or components for the missile path or range, (3) providing shields and barriers for systems and components, (4) designing the equipment to withstand the impact of the most damaging missile, (5) providing design features to prevent the generation of missiles, or (6) orienting missile sources to prevent missiles from striking SSCs subject to missile protection; and,

3. Has shown that controls ensure that all unsecured maintenance equipment inside containment, including equipment required for maintenance and that undergoing maintenance, will not generate a potential missile hazard.

For DC and COL reviews, the findings will also summarize the staff's evaluation of requirements and restrictions (e.g., interface requirements and site parameters) and COL information items relevant to this DSRS section.

In addition, to the extent that the review is not discussed in other SER sections, the findings will summarize the staff's evaluation of the ITAAC, including design acceptance criteria, as applicable.

V. IMPLEMENTATION

The regulations in 10 CFR 52.17(a)(1)(xii), 10 CFR 52.47(a)(9), and 10 CFR 52.79(a)(41) establish requirements for applications for ESPs, DCs, and COLs, respectively. These regulations require the application to include an evaluation of the site (ESP), standard plant design (DC), or facility (COL) against the Standard Review Plan (SRP) revision in effect six months before the docket date of the application. While the SRP provides generic guidance, the staff developed the SRP guidance based on the staff's experience in reviewing applications for construction permits and operating licenses for large light-water nuclear power reactors. The proposed small modular reactor (SMR) designs, however, differ significantly from large light-water nuclear reactor power plant designs.

In view of the differences between the designs of SMRs and the designs of large light-water power reactors, the Commission issued SRM- COMGBJ-10-0004/COMGEA-10-0001, "Use of Risk Insights to Enhance the Safety Focus of Small Modular Reactor Reviews," dated August 31, 2010 (ML102510405) (SRM). In the SRM, the Commission directed the staff to develop risk-informed licensing review plans for each of the SMR design reviews, including plans for the associated pre-application activities. Accordingly, the staff has developed the content of the DSRS as an alternative method for the evaluation of a NuScale-specific application submitted pursuant to 10 CFR Part 52, and the staff has determined that each application may address the DSRS in lieu of addressing the SRP, with specified exceptions. These exceptions include particular review areas in which the DSRS directs reviewers to consult the SRP and others in which the SRP is used for the review. If an applicant chooses to address the DSRS, the application should identify and describe all differences between the design features (DC and COL applications only), analytical techniques, and procedural measures proposed in an application and the guidance of the applicable DSRS section (or SRP section as specified in the DSRS), and discuss how the proposed alternative provides an acceptable method of complying with the regulations that underlie the DSRS acceptance criteria.

The staff has accepted the content of the DSRS as an alternative method for evaluating whether an application complies with NRC regulations for NuScale SMR applications, provided that the application does not deviate significantly from the design and siting assumptions made by the NRC staff while preparing the DSRS. If the design or siting assumptions in a NuScale application deviate significantly from the design and siting assumptions the staff used in preparing the DSRS, the staff will use the more general guidance in the SRP as specified in 10 CFR 52.17(a)(1)(xii), 10 CFR 52.47(a)(9), or 10 CFR 52.79(a)(41), depending on the type of application. Alternatively, the staff may supplement the DSRS section by adding appropriate criteria in order to address new design or siting assumptions.

VI. REFERENCES

1. 10 CFR Part 50, Appendix A, GDC 4, "Environmental and Dynamic Effects Design Bases."