

## **Enclosure 1**

**MFN 15-038**

### **GEH Response to Item #12**

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**NRC- Suggested Design Changes Item #12 – Operating Procedures – Low Level Reactor Coolant**

*Add a COL item to develop operating procedures to respond to prolonged low-level reactor coolant leakage below technical specification limits.*

**GEH Response:**

The ABWR DCD rev 5 COL item 5.2.6.1 will be modified. The current COL item is:

**5.2.6.1 Conversion of Indications**

Procedures and graphs will be provided by the COL applicant to operations for converting the various indicators into a common leakage equivalent (Subsection 5.2.5.9).

Modified COL item will be:

**5.2.6.1 Leak Detection Monitoring**

The COL Applicant will include in its operating procedure development program:

- Procedures to convert different parameter indications for identified and unidentified leakage into common leak rate equivalents and leak rate rate-of-change values.
- Procedures for monitoring, recording, trending, determining the source(s) of leakage, and evaluating potential corrective action plans.
- Milestone for completing this category of operating procedures.

The licensee is responsible for the development of a procedure to convert different parameter indications for identified and unidentified leakage common leak rate equivalents (volumetric or mass flow) and leak rate rate-of-change values. Typical monitoring includes parameters such as sump pump run time, sump level, condensate transfer rate, process chemistry/radioactivity. The monitored leakage equivalent provides information used by the plant operators to manage the leakage and establish whether the leakage rates are within the allowable Technical Specifications and determine the trend (Subsection 5.2.5.9).

The licensee is responsible for the development of procedures for monitoring, recording, trending, determining the source(s) of leakage, and evaluating potential corrective action plans. An unidentified leakage rate-of-change alarm provides operators an early alert to initiate response actions prior to reaching the Technical Specifications limit.

Also due to the name change of the COL item the listing in Table 1.9-1 must be updated.

**Impact on DCD:**

The DCD Tier 2 Table 1.9-1 and Section 5.2.6.1 are being revised. The ABWR DCD R5 marked up pages is attached in Enclosure 2.