

## **PRA Issue List Regarding APR-1400, DCD Tier 2, SECTION 19.1**

### **Issue # PRA-135 (AI 19-142)**

DCD Section 19.1.6.3.1.2 "Key Assumptions," Item b states that, "When major equipment replacement is underway that requires opening of the removable barriers, the portion of the evolution where the barriers are removed will be performed during defueled conditions (POS 8)." This appears to be a key assumption that should be considered for inclusion in the risk insights table (DCD Table 19.1-4) and appropriate control.

### **Response**

This is a key assumption for LPSD Fire, and risk insight No. 53 in Table 19.1-4 (23 of 25) already addresses this issue. Risk insight No. 53 states, "During plant shutdown operation, risk can be minimized by appropriate outage management, administrative controls, procedures, and operator knowledge of plant configuration. For example, the removable walls and slabs between areas in a division for equipment replacement must remain intact during plant shutdown operation. Any SSC maintenance that requires these removable walls and slabs to be removed must be performed during the defueled condition." And it also will be added in the COL 13.4 (7) in Section 13.5 as shown in the Attachment.

### **Impact on DCD**

The DCD Section 13.5.3 will be revised as shown in the Attachment.

### **Impact on PRA**

There is no impact on the PRA model.

### **Impact on Technical Specifications**

There is no impact on the Technical Specifications.

### **Impact on Technical/Topical/Environmental Reports**

There is no impact on any Technical, Topical, or Environmental Report.

**APR1400 DCD TIER 2**

COL 13.5(6) The COL applicant is to describe how other operating and maintenance procedures are classified, which group or groups within the operating organization have the responsibility for following each class of procedures, and the general objectives and character of each class and subclass.

COL 13.5(7) The COL applicant is to provide a program for developing shutdown procedure.

13.5.4 References

1. Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Rev. 3, U.S. Nuclear Regulatory Commission, June 2013.
2. ANSI/ANS 3.2, "Managerial, Administrative, and Quality Assurance Controls for Operational Phase of Nuclear Power Plants," American Nuclear Society, 2012.
3. NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures," U.S. Nuclear Regulatory Commission, 1982.
4. NUREG-0737, "Clarification of TMI Action Plan Requirements," U.S. Nuclear Regulatory Commission, 1980.

- The risk can be minimized by appropriate outage management, administrative controls, procedures, and operator knowledge of plant configuration during plant shutdown operation. For example, the removable walls and slabs between areas in a division for equipment replacement must remain intact during plant shutdown operation. Any SSC maintenance that requires these removable walls and slabs to be removed must be performed during the defueled condition. Also, the foreign material exclusion (FME) program should direct that the covers be installed over the trash racks on the inlet to the holdup volume tank (HVT) during refueling outages.