

Comment Response Matrix Chapter 9

Comment # <i>(Affiliation: NuScale Power, LLC)</i>	DSRS Section	Paragraph, Item, or Page	Comment / Basis	Commenter Recommendation	NRC Staff Technical Resolution
386	9.1.2	Section I. Review Interfaces, Item 4	Reference to DSRS Section 3.4.1 is not applicable to NFS and SFS racks as they are not safety-related or RTNSS-B	NuScale recommends deleting this item.	Even though not safety-related, the SFP does have a safety function which is to maintain spent fuel coolability. Also, the racks are required to be Seismic Category I in order to maintain a coolable geometry. No changes to the DSRS were made.
387	9.1.2	Section I. Review Interfaces, Item 5	Reference to DSRS Sections 3.5.12 and 3.5.13 are not applicable as they are not within containment.	NuScale recommends deleting this item.	The staff assumes that NuScale intended to refer to DSRS Sections 3.5.1.2 and 3.5.1.3. With this understanding: The staff does not have enough design detail information to eliminate the references to Sections 3.5.1.2 and 3.5.1.3. By the time the application is received, the applicability of these Sections should be clear. No changes to the DSRS were made.
388	9.1.2	Section VI N/A	Reference to some applicable GDCs appears to be missing.	NuScale recommends adding reference to GDC 2, 5, and 63	DSRS Reference Section was updated to include applicable GDCs.

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389	9.1.2	Section VI Item 19,20,21, and 23,	Missing EPRI document numbers.	NuScale recommends adding EPRI document numbers for clarity	The staff does not agree with the comment. The staff does not agree that adding EPRI document numbers would provide any benefit. An example is "Pressurized Water Reactor Primary Water Chemistry Guidelines". Revision 6 of this document has a document number of 1014986. Revision 7 of this document has a document number of 3002000505. Additionally, document 1014987 (the next number is sequence from Revision 6 of the water chemistry guidelines) relates to using Raman Spectroscopy to evaluate lead species in PWRs. Adding a document number does not result in an efficient identifier because a revised document may utilize a new number that is not logically sequenced from the previous revision and the new number may have a completely new format.
390	9.1.3	I. Areas of Review; 1st paragraph; 5th sentence	Current sentence reads, "The NuScale accomplish this function passively, by designing the SFP with sufficient water volume, such that not active cooling system is needed in order to cool the stored fuel."	NuScale recommends this sentence is replaced with "The NuScale design accomplishes this function passively, by designing the SFP with sufficient water volume, such that no active cooling system is needed in order to cool the stored fuel."	Sentence was modified as indicated by commenter.

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391	9.1.3	I. Areas of Review; under The specific areas of review are as follows: #1, II. Acceptance Criteria; Requirements; #1 and #2	Per Reg Guide 1.13, the classification of the ventilation system for the SFP area as Seismic Category I	NuScale recommends adding the following to the end of the sentence: "if necessary to limit the offsite dose consequences of fuel pool boiling."	No revisions were made to the DSRS. Offsite dose is not the only issue that requires the SFP ventilation system to be classified as Seismic Category I.
392	9.1.3, Spent Fuel Pool Cooling and Cleanup System	I. , Page 1, Para 1	The DSRS text "The NuScale accomplish this function passively" is not grammatically correct.	NuScale recommends this wording be updated to clarify intent. Suggested wording might be "The NuScale plant accomplishes this function passively."	Accepted. Sentence was modified as indicated by commenter in Comment # 390
393	9.2.6	General	See P&ID NP12-01-C020-M-PD-2013 S08 P&ID Condensate and Feedwater System. Generally, the design documents use the	NuScale recommends the abbreviation for Condensate Storage Tank(s) (CST) be consistently used throughout document.	See footnote 1 ¹

¹ The NRC Staff determined whether to develop a new DSRS section after considering whether significant differences in the functions, characteristics, or attributes of the NuScale design required major revision of the related SRP section guidance, or whether structures, systems, and components identified in the NuScale design are unique and not addressed by the current SRP. The Staff revisited these criteria after publishing the Draft version of this DSRS section (Issued in June 2015) and determined, based on the most recent NuScale design, that the related SRP section is appropriate to perform the NRC safety review. Therefore, this DSRS section will not be issued as final and the related SRP

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			term Condensate Storage Tank(s) not Condensate Storage Facilities. Need to be consistent with Design Documents.		
394	DSRS 9.2.6	Page 1	<p>The description in the DSRS of the functions of the CST (NRC refers to it as CSF) is not accurate. The CST does not perform a safety-related function. It does not supply water for safe shutdown. It does not provide makeup water to auxiliary systems.</p> <p>The NuScale plant has one dedicated CST for each main condenser (MC) with each power module up to 12 modules per plant.</p> <p>The condensate storage tank (CST) provides make-up water to the main condenser and the condensate and feedwater system. It also supplies water to, and receives return</p>	NuScale recommends that this description is rewritten for better understanding by stating that condensate from the condenser will be supplied from or rejected to the Condensate Storage Tank (CST).	See footnote 1

section will be used for this portion of the NuScale review. Since this comment is on a Draft DSRS Section that is no longer being used, the staff will not provide a specific response to it. In deciding to use the related SRP section, the staff has not necessarily determined that the SRP section is wholly applicable without modification. For example, as the NRC staff gains greater understanding of the NuScale design or if the design changes during the review, the staff would assess whether different or supplemental review criteria are needed.

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			<p>water from various plant auxiliary systems.</p> <p>The CST is designed as a non safety-related structure, system, or component (SSC).</p>		
395	9.3.2	Review Interfaces 4, 9, and 10:	This review interface is not applicable to NuScale Process and Post Accident Sampling System design because there are no PSS containment isolation valves or PSS piping or component located inside the containment vessel.	NuScale recommends that Review Interfaces 4, 9, and 10 should be deleted since there will be no information provided relative to Process and Post Accident Sampling System in the referenced sections.	See footnote 1
396	9.3.2	Review Interface; DSRS Acceptance Criteria 1, Table: Sumps inside containment ; Review Procedures 13: Section B	This review interface should be revised to reflect that the NuScale design does not include a containment sump and that there is not a safety injection system or signal.	NuScale recommends that "containment sump water" be changed to "containment water", and delete "or safety injection signal".	See footnote 1

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397	9.3.2	DSRS Acceptance Criteria 1, Table: Refueling Storage Tank	The NuScale design does not include refueling water storage tank.	NuScale recommends removal of this reference to refueling water storage tank from the DSRS Acceptance Criteria 1 Table.	See footnote 1
398	9.3.2	DSRS Acceptance Criteria 1, Table: Chemical Additive Tank	The NuScale design does not include a chemical additive tank.	NuScale recommends removal of this reference to chemical additive tank from the DSRS Acceptance Criteria 1 Table.	See footnote 1
399	9.3.2	DSRS Acceptance Criteria 1, Table: Steam Generator Blowdown	The NuScale design does not include a steam generator blowdown system.	NuScale recommends removal of this reference to steam generator blowdown system from the DSRS Acceptance Criteria 1 Table.	See footnote 1
400	9.3.2	DSRS Acceptance Criteria 4.F	The NuScale design does not include containment isolation valves. Nonetheless this requirement can be applied to sample isolation valves of the sample lines which contain reactor coolant. However, the CVCS sample line isolation valves do not perform a safety function;	NuScale recommends eliminating the words "environmentally qualified" from this acceptance criterion.	See footnote 1

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			therefore, the valves do not have to be an environmentally qualified component.		
401	NuScale DSRS 9.3.2	I. AREAS OF REVIEW, Intro, Review Interfaces, Item 2	There is not a DSRS Section 3.7.4 "Seismic Instrumentation" for NuScale as referenced in Review Interface Item 2.	NuScale recommends this Review Interface section be changed to SRP Section 3.7.4.	See footnote 1
402	9.3.2	Review Interface 7: Review of Section 3.10 "Seismic and Dynamic Qualification of Mechanical and Electrical Equipment":	This DSRS review interface is not applicable to the NuScale PSS design because the system does not have any Category I instrumentation.	NuScale recommends this review interface be removed.	See footnote 1

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403	9.3.2	Review Interface 13:	NuScale PSS design does not include any containment isolation valves. However, containment isolation valves associated with CVCS and CES are required to be operational to support post-accident sampling of reactor coolant and containment atmosphere.	NuScale recommends the following revision: "containment isolation valves in the that are required to support the sampling system."	See footnote 1
404	9.3.2	Review Interface 14:	Local sample points are included in the LRWMS design to enable sampling of process effluent.	NuScale recommends the following revision: "review of the process effluent sampling in the liquid radioactive waste management system"	See footnote 1
405	9.3.2	Review Interface 15:	PSS will interface with Reactor building HVAC and/or RWB HVAC for ventilation. Review interface with GRWMS is applicable in respect to local sample points are provided in the GRWMS design for collection of gas effluent sample.	NuScale recommends the following revision: "review of the ventilation systems that may operate during sampling of radioactive materials" with suggested changes.	See footnote 1

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406	9.3.2	Technical Rationale 7: GDC 26 discussion of emergency boration injection system	NuScale design does not have emergency boration injection system tanks and does not perform emergency boration. Suggest that these terms should be changed to reflect NuScale design.	NuScale recommends replacement of "emergency boration injection system" with "boron addition system", and "emergency boration" with "reactor coolant injection"	See footnote 1
407	9.3.2	Evaluation Findings:	Certain terms should be changed to be consistent with NuScale design.	NuScale recommends the following changes to be consistent with the NuScale design: Delete "the refueling water storage tank" Change "boron injection tank" to "boric acid storage tank" Change "the emergency boration injection system boron injection tank" to "boric acid storage tank" Change "the pressurizer tank" to "the pressurizer gas space"	See footnote 1
408	9.3.2	Review Procedures 9: Remove from the last sentence, "or safety injection signals"	The NuScale design does not include a safety injection system; therefore, a safety injection signal does not exist.	NuScale recommends removing "or safety injection signals" from the last sentence.	See footnote 1
409	NuScale DSRS 9.3.4	I. AREAS OF	The 3rd para of this section states; "The CVCS has been categorized as a non- safety	NuScale recommends that the 3rd paragraph of I. AREAS OF REVIEW be deleted since	Staff notes that Comment 409 and Comment 415 both concern identical text in different parts of

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		REVIEW p. 9.3.4-1	system; however, there are CVCS components directly connected to the reactor coolant pressure boundary that provide reactor coolant pressure boundary protection and isolation functions are safety-related and risk significant. The system is risk-significant as it provides makeup water to the RCS ensuring adequate coolant inventory against small breaks and leakage from the RCPB and to reduce the radioactivity level of the primary coolant system."	categorizing of plant systems for risk significance is understood to be determined by other existing NRC regulatory guidance apart from review standards.	draft DSRS Section 9.3.4. Whereas Comment 409 suggests deleting the entire paragraph, Comment 415 suggests deleting only the second sentence, which deals with risk determination. Consistent with Comment 415 and the basis given for the recommendation in Comment 409 (which addresses risk determination), the staff deleted the part of the 3 rd paragraph under I. AREAS of REVIEW which deals with risk determination. Risk is determined by the DSRS Chapter 19 review and not the review performed in DSRS 9.3.4 that reviews the design bases of the CVCS.
410	9.3.4	Section III, REVIEW PROCEDURE S, para #2	The DSRS draft states "10 CFR 20.1406 applies to this DSRS section because the Primary Shutdown Systems (PSS) will connect with contaminated systems." It appears the intent of this statement was to state that 10 CFR 20.1406 is applicable to the CVCS because it will connect with contaminated systems. Also, PSS as is referred to for the NuScale design is the Process Sampling System,	NuScale recommends that this section is reworded to "10 CFR 20.1406 applies to this DSRS section because the CVCS will connect with contaminated systems"	The wording in Technical Rationale, Item #10 on page 9.3.4-9 has been modified to replace PSS with CVCS.

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			not Primary Shutdown Systems.		
411	9.3.4	Section III, REVIEW PROCEDURES, 3.D.i.	<p>The DSRS draft states "Boration of the reactor coolant system is accomplished with boric acid source, such as boric acid storage tank (BAST) or refueling water storage tank (RWST), where applicable, through redundant flow paths, and CVCS meets PWR boration technical specifications."</p> <p>The NuScale CVCS design does not include redundant flow paths. This area of review is not written in a way that is reflective of the NuScale specific CVCS function per the BAS, especially in regards to the multi-module plant design.</p>	NuScale recommends that the last part of the bolded part of the sentence be deleted or re-word to reflect that redundant flow paths are not provided from the BAS to the CVCS, and the boration technical specification for the boric acid storage tank is part of the BAS, not CVCS.	Deleted "through redundant flow paths" as the NuScale design does not include redundant paths. Also replaced CVCS with BAST when referring the boron technical specifications.
412	NuScale DSRS 9.3.4	I. AREAS OF REVIEW Interfaces II. ACCEPTANCE	<p>The following sections referenced in this DSRS that are said to be used for review interface are not of the correct type (i.e. DSRS Section vs SRP Section) These are listed in I. AREAS OF REVIEW as DSRS but should be SRP:</p>	NuScale recommends references to interface review section be made as SRP or DSRS appropriately	The Review Interface section has been updated based on latest list of whether a DSRS or SRP section is used as review guidance.

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		CRITERIA DSRS Acceptance Criteria, Item 8 III. REVIEW PROCEDU RES, Item 9	3.2.1, 3.2.2, 3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.6, 3.10, 3.12, 5.2.3, 7.6, Appendix 7A, 9.2.2, 9.3.3, 9.5.1, 12.1, 14.3, 15.6.1. Sections 8.3.1 and 8.3.2 in Item 19 should be "DSRS Sections". DSRS Section 14.3 in DSRS Acceptance Criteria, Item 8 and III. REVIEW PROCEDURES, Item 9 should be SRP Section 14.3.		
413	NuScale DSRS 9.3.4	III. REVIEW PROCEDU RES Item 5, p. 9.3.4-13	A part of the following statement should be deleted; "The descriptive information, schematics or P&IDs (if applicable), layout drawings, and failure modes and effects analyses in the SAR are reviewed to assure that safety-related portions of the system (reactor coolant pressure boundary and isolation of the primary coolant system) will function following design basis accidents assuming a single active component failure."	NuScale recommends the statement be revised as shown in the comment for wording to be deleted from Section III.	No changes necessary as the safety-related portions of the CVCS are maintaining the reactor coolant boundary and isolation of the primary coolant system.

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414	9.3.4	Section I, <u>AREAS OF REVIEW</u> , para #1	The DSRS draft states that "This system...adds heat and establishes stable natural circulation flow during reactor startup..."	NuScale recommends this statement be reworded to "This system...adds heat and establishes stable natural circulation during reactor startup in conjunction with the Module Heatup System (MHS)."	DSRS was revised to reflect comment.
415	9.3.4	Section I, <u>AREAS OF REVIEW</u> , para #3	The DSRS draft states that "The CVCS has been categorized as a non-safety system; however, there are CVCS components directly connected to the reactor coolant pressure boundary that provide reactor coolant pressure boundary protection and isolation functions are safety-related and risk- significant. The system is risk- significant as it provides makeup water to the RCS ensuring adequate coolant inventory against small breaks and leakage from the RCPB and to reduce the radioactivity level of the primary coolant system. "	NuScale recommends a revision to the DSRS to delete the second (bolded) sentence in the comment. The DSRS should not prescribe what CVCS functions are risk-significant; it should only cover the NRC review process/criteria of the CVCS design including any provisions for functions that are determined to be risk-significant by the final PRA.	Staff agrees with the comment and recommendation. Risk significance of the system is determined by the DSRS Chapter 19 review and not the review performed in DSRS 9.3.4, which reviews the design bases of the CVCS.
416	9.3.4	Section I, <u>Review Interfaces</u> , #22	This review interface is a duplicate of item #11.	NuScale recommends deleting review interface #22.	Item 22 deleted.

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417	9.3.4	Section II, <u>ACCEPTAN C E CRITERIA, Technical Rationale,</u> #8 and #10	The DSRS draft states "The CVCS is designed with storage tanks to handle venting and draining from various CVCS systems." However, the RWD/LRW systems that are designed with storage tanks to handle venting and draining from various CVCS systems.	NuScale recommends rewording to state that radioactive waste systems are designed to handle venting and draining from various CVCS systems.	DSRS was revised to reflect comment. The storage and release of radioactive material is the addressed by the radioactive waste system and not CVCS system.
418	NuScale DSRS 9.3.6	VI. REFERENC ES, Item 11, p. 9.3.6-10	Reference 11 is listed as DSRS Section 7.7 and it should be SRP Section 7.7, Control Systems, Rev 5.	NuScale recommends correction to this reference to be SRP Section 7.7.	The DSRS was revised to reflect comment. DSRS Section 9.3.6 was revised to remove reference to DSRS and SRP Section 7.7 because that section of the DSRS does not exist and that section of the SRP has been determined to be not applicable and will not be used for the NuScale review.
419	9.3.6	I. Areas of Review - first paragraph, second sentence	The word "evacuated" should be removed from, "The NuScale reactor containment is an evacuated, low alloy steel...", as it implies there will be no gases or moisture, which depending on the leak rate is untrue.	NuScale recommends a revision to the paragraph to delete the word "evacuated".	DSRS was revised to reflect comment. The staff considers this change editorial.

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420	9.3.6	I. Areas of Review - third paragraph, first sentence	"Containment evacuation system" should be deleted and just the acronym (CEFS) should be used if it is intended to mention the CEFS.	NuScale recommends a revision to the sentence to delete the words "containment evacuation system".	DSRS was revised to reflect comment. The staff considers this change editorial.
421	9.3.6	I. Areas of Review - third paragraph, first sentence, numbered list after fourth paragraph, #3	The sentence uses the words "detect and identify reactor coolant system (RCS) leakage". The word "identify" should not be used as all leakage removed by the CES is considered unidentified due to the mixture with other sources such as RCCW/reactor pool water (flange leak).	NuScale recommends a revision to this section to delete "identify" when discussing the leak detection capabilities of the CES.	<p>DSRS was revised to reflect comment. The staff considers this change as one that makes the DSRS consistent with the design and is safe because all leakage into containment will be considered unidentified leakage and compared with the Technical Specification limits for unidentified leakage.</p> <p>The staff identified one additional corresponding change that should have been made in the DSRS: E. The primary review organization reviews the capability of CEFS to detect and identify RCS leakage. The staff should verify that the designed instrumentation can monitor containment vessel space for radiation and temperature such that RCS leakage can be detected and identified during normal operation.</p>

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422	9.3.6	All sections	Review of the CES containment isolation valves should not be performed using 9.3.6. The CVCS DSRS Review Interface #17 states "Review of the design of isolation provisions of those portions of the CVCS that penetrate primary containment is performed under DSRS Section 6.2.4."	NuScale recommends a revision to this DSRS throughout to remove review interfaces, acceptance criteria relating to containment isolation provisions.	The staff does not agree with this comment because there are containment isolation valves in the design. DSRS 6.2.4 is required as review interface.
423	9.3.6	I. Areas of Review - numbered list after fourth paragraph, #5	The system does not use a "purge mode" to remove to pressurize the containment to remove water.	NuScale recommends a revision to this DSRS sentence to reword based on using the CES piping to pressurize the CNV to provide the necessary NPSHr to pump out the water entrained within the containment vessel.	DSRS was revised to reflect comment.
424	9.3.6	I. Areas of Review - numbered list after fourth paragraph, #5	The sentences says the system will use pressurize air to purge "the containment after refueling and during normal operations". The CFDS will only be used prior to and after the completion of refueling. It will not be used to remove entrained liquid within the containment vessel during normal operation.	NuScale recommends a revision to the sentence to remove "and during normal operation".	Deleted "and during normal operations" because the system is not designed to purge the containment during normal operation. Revised DSRS Section 9.3.6 to remove GDC 56, "Primary containment Isolation," from the Acceptance Criteria Requirements. The review interfaces and review procedures make it clear that the review of the CES containment isolation valves will be performed under DSRS Section 6.2.4, rather than DSRS Section 9.3.6.

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425	9.3.6	II. Acceptance Criteria, Requirements, #11	10CFR50.34(f)(2)(xiv)(E) does not apply to the NuScale design as there is no direct path from the containment vessel to the environs.	NuScale recommends a revision to #11 to exempt sentence (E) from the acceptance criteria.	The DSRS remains unchanged because NuScale only needs to demonstrate compliance with the technically relevant portions of 10CFR50.34(f)(2)(xiv).
426	9.3.6	III. Review Procedures, Paragraph 3.C	The CEFS does not discharge to the gaseous radioactive waste system. The CEFS discharges to the reactor building ventilation system	NuScale recommends removal of the reference to the gaseous radioactive waste management system.	DSRS was revised to reflect comment.
427	9.3.6	III. Review Procedures, Paragraph 3.C, second sentence	Spelling correction. Correct "Red-Waste" to "Rad-Waste" or "Radioactive Waste"	NuScale recommends a revision to the sentence to fix spelling error.	The staff agrees with the comment and has made the change.
428	9.3.6	III. Review Procedures, Paragraph 3.D, first sentence	The word "will" should be changed to "may be" as the CFDS is only intended to be used if there is an isolatable CVCS LOCA outside of the CNV, or if CVCS is unavailable.	NuScale recommends a revision to the sentence to use "may be" or equivalent.	The staff agrees with the comment and has made the change.
429	9.5.2	III. REVIEW PROCEDURES item 3.F	As currently written, this procedure on testing might result in creating high levels of background noise when the system functional	NuScale recommends adding "pre- operational" so that the item reads, "Verification that pre-operational functional testing..."	The staff agrees with the comment and has made the change.

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			test is performed. This type of testing might be appropriate for pre-operational testing, but not practical for periodic functional testing.		