

## Comment Response Matrix Chapter 16

<b>Comment #</b> <i>(Affiliation: NuScale Power, LLC)</i>	<b>DSRS Section</b>	<b>Paragraph, Item, or Page</b>	<b>Comment / Basis</b>	<b>Commenter Recommendation</b>	<b>NRC Staff Technical Resolution</b>
668	16	I.1., first paragraph	The analysis of the four LCO criteria is a voluminous report and has typically been presented as a separate, referenced report. The NuScale report is planned to be submitted as a separate report.	NuScale recommends adding discussion of alternative to submit as a separate report that is referenced in the DCD.	The staff agrees with the comment and revised the last sentence of Section I.1, first paragraph, as indicated: " <u>The DC applicant should present the results of this evaluation in DCD Chapter 16 or reference a report containing the results of this evaluation in DCD Chapter 16 and submit the report as part of the DC application.</u> "
669	16	I.1.A., first paragraph; Reference 9	Throughout the DSRS reference is made only to PWR STS; however some aspects of the NuScale GTS may include consideration of or use of specifications based on BWR STS.	NuScale recommends modification of discussions to remove 'PWR' when referring to operating designs, certified designs, and NUREG STS	<p>Although Reference 9 was listed for this comment, staff notes that the comment is not about Reference 9.</p> <p>The staff agrees with the comment and has revised the first paragraph of Section I.1.A, as indicated, to replace 'PWR' with "LWR", an acronym that stands for "light-water power reactor":</p> <p>"The proposed [generic technical specifications] GTS are reviewed for whether the breadth, scope, detail, format and content are consistent with that of the [standard technical specifications] STS, which are based on</p>

<b>Comment #</b> <i>(Affiliation:  NuScale  Power, LLC)</i>	<b>DSRS  Section</b>	<b>Paragraph,  Item, or  Page</b>	<b>Comment / Basis</b>	<b>Commenter Recommendation</b>	<b>NRC Staff Technical Resolution</b>
					<p>operating <del>PWR</del> <u>light-water power reactor (LWR)</u> designs, and the approved GTS in the DCD for certified <del>PWR</del> <u>LWR</u> designs." The phrase "PWR design" occurs in several other places in the DSRS. In the following locations, "PWR" was replaced with "LWR" as indicated:</p> <p><u>Section I.1.A third paragraph:</u>  "Insight for defining TS requirements can also be obtained from the STS for the operating reactors and the GTS for approved certified <del>PWR</del> <u>LWR</u> NSSS designs, and by considering similarities and differences among the SSCs and TS requirements of these designs."</p> <p><u>Section I.1.F first paragraph, first sentence:</u>  "... equivalent SSC in other <u>LWR</u> designs."</p> <p><u>Section I.1.I:</u>  "... currently operating <del>PWR</del> <u>LWR</u> designs ... in the DCDs for certified <del>PWR</del> <u>LWR</u> designs."</p> <p><u>Section I.2.D, first sentence:</u>  "... which are based on currently operating <del>PWR</del> <u>LWR</u> designs, the approved GTS bases in the DCD</p>

<b>Comment #</b> <i>(Affiliation:  NuScale  Power, LLC)</i>	<b>DSRS  Section</b>	<b>Paragraph,  Item, or  Page</b>	<b>Comment / Basis</b>	<b>Commenter Recommendation</b>	<b>NRC Staff Technical Resolution</b>
					for certified <u>PWR-LWR</u> designs,“ <u>Section III.4, first sentence:</u> “... for previously approved <u>PWR-LWR</u> designs...” <u>Section III.9, first sentence:</u> “... licensed <u>PWR-LWR</u> designs.”
670	16	DSRS Draft for Comment, I.1.A., second paragraph; Reference 9	A revised version of the Writer's Guide for Technical Specifications was submitted to the NRC on 2/14/2012 and the latest version utilized is identified as Revision 1, August 2012.	NuScale recommends revising this reference to the 2012 version of Writer's Guide	Staff notes that Revision 1, the 2010 version of TSTF-GG-05-01, is the latest version, and Reference 9 has been corrected to list that version. There is no 2012 version. Section I.1.A, second paragraph is revised as follows: “ <del>The</del> <u>Revision 1 of the writer’s guide for plant specific improved TS, TSTF-GG-05-01, dated August 2010 (Ref. 9), was followed in preparing the latest revision to the STS NUREGs and should be used to achieve and maintain consistency among the TS requirements for different reactor designs.”</u> Reference 9 of Section VI is revised as follows: <del>9. TSTF-GG-05-01, Technical Specifications Task Force (A Joint Owners Group Activity).</del> “Writer’s Guide for Plant-

<b>Comment #</b> <i>(Affiliation: NuScale Power, LLC)</i>	<b>DSRS Section</b>	<b>Paragraph, Item, or Page</b>	<b>Comment / Basis</b>	<b>Commenter Recommendation</b>	<b>NRC Staff Technical Resolution</b>
					Specific Improved Technical Specifications," <u>TSTF-GG-05-01, Revision 1, June 2005 August 2010</u> , ADAMS Accession No. <u>ML12046A089 ML070660229</u> .'
671	16	DSRS Draft for Comment, I.1.G., I.3.C, second paragraph	The first two sentences of this subsection address changes in the baseline PRA.	NuScale recommends clarifying that these sentences are applicable to COL applicants	<p>The commenter's paragraph reference appears to be incomplete. The referenced language also appears in:</p> <ul style="list-style-type: none"> <li>• Section I.2.B last paragraph; and</li> <li>• Section III.8.D.</li> </ul> <p>The staff does not agree with the comment that the intended scope of SRP 16.1 is limited to COL applications.</p> <p>To clarify this point, the staff revised the two sentences that were inadvertently included in Section I.1.G, but which belong as the last paragraph in Section I.1.F. (Note that this resolves comment 672.) The last paragraph of Section I.1.F is revised as indicated:</p> <p>"The guidance in SRP Section 16.1 provides insights for addressing <u>a changes to or departure from a provision in the referenced technical specifications (the STS, GTS, or plant-specific TS)</u> with respect to a PRA</p>

<b>Comment #</b> <i>(Affiliation: NuScale Power, LLC)</i>	<b>DSRS Section</b>	<b>Paragraph, Item, or Page</b>	<b>Comment / Basis</b>	<b>Commenter Recommendation</b>	<b>NRC Staff Technical Resolution</b>
					<p>baseline, which is that associated with the current design <u>applicable to the referenced technical specifications, assuming a PRA is available that is technically adequate for evaluating the change or departure. Regulatory Guides (RGs) 1.174, “An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis” and 1.177, “An Approach for Plant Specific, Risk Informed Decisionmaking: Technical Specifications.”</u> can be used to assess the effect of a design change as well as <u>a change to a technical specification required action</u> completion times by way of sensitivity analyses.”</p> <p>The staff has made conforming changes to the same two sentences appearing in the last paragraph of Section I.2.B, the second paragraph of Section I.3.C, and the second paragraph of Section III.8.D.</p>
672	16	DSRS Draft for Comment, I.1.G	This paragraph appears to be incorrectly formatted. The first two sentences are more related to subsection F, than	NuScale recommends relocating the first two sentences to end of subsection F. Relocate 'G.' to balance of first paragraph of	Staff agrees that the two sentences belong with paragraph F. Revisions were made accordingly, as described in the

<b>Comment #</b> <i>(Affiliation: NuScale Power, LLC)</i>	<b>DSRS Section</b>	<b>Paragraph, Item, or Page</b>	<b>Comment / Basis</b>	<b>Commenter Recommendation</b>	<b>NRC Staff Technical Resolution</b>
			the balance of the subsection G.	subsection G.	technical resolution of comment 671.
673	16	DSRS Draft for Comment, I.1.B	NuScale is titling TS section 3.5 'Passive Core Cooling'.	NuScale recommends modifying the title of 3.5 to 'Passive Core Cooling'	The NRC staff understands that NuScale's comment is intended to apply to Section I.3.B. With this understanding, the staff agrees with the comment and revised the Section I.3.B table to replace "Emergency Core Cooling Systems (ECCS)" with "Passive Core Cooling," but added a footnote to indicate the usual title for TS Section 3.5.
674	16	DSRS Draft for Comment, II, page -8, beginning of page	The NuScale GTS is based on all three PWR STS, the AP1000 GTS, and with consideration of certain aspects of BWR STS. Also, the reference to a specific version of the AP1000 DC rule is inappropriate - commonly, the most recently available approved AP1000 technical specifications (Vogtle, Summer, and GTS) are being used as basis documents to ensure most recent NRC approvals are used.	NuScale recommends, as a minimum, that the reference to B&W STS is replaced with reference to CE STS which are being utilized more commonly as a basis for NuScale GTS.	The staff agrees with the comment. The reference to B&W STS is replaced with a reference to CE STS as Reference 5, and the Westinghouse STS as Reference 4. In addition, a reference to the STS for Westinghouse AP1000 plants, as reference number 17, was inserted into Section II in the list of PWR STS and GTS that may provide guidance for preparing TS requirements for SMR designs, and Section VI at the end of the list of references. The staff also changed reference numbers "3 and 4" to references "4, 5 and 17" in paragraph III.5.B. The discussion in Section II already indicates that other

<b>Comment #</b> <i>(Affiliation: NuScale Power, LLC)</i>	<b>DSRS Section</b>	<b>Paragraph, Item, or Page</b>	<b>Comment / Basis</b>	<b>Commenter Recommendation</b>	<b>NRC Staff Technical Resolution</b>
					applicable NRC-approved TS provisions in STS NUREGs, GTS, or plant-specific TS may be referenced as a basis for NuScale generic TS provisions.
675	16	DSRS Draft for Comment, III.5.B	The DSRS indicates that TS and bases are to be reviewed to ascertain whether the SSC's or parameters are consistent with the structure and content of the STS and STS bases.	NuScale recommends that clarification is added that this is actually a comparison to ensure the level of detail, structure, etc. are consistent with the STS. The actual content of the TS and TS Bases is determined appropriate based on para. A and C.	The staff agrees with the comment. DSRS revised paragraph III.5.B by replacing "structure and content" with "organization, format, and level of detail."
676	16	DSRS Draft for Comment, III.8.A	This paragraph is inconsistent with the fundamentally different NuScale design and the designs that are addressed by the 'reference' technical specifications.	NuScale recommends clarification to include a caveat that the comparison should include consideration of the design and operational differences between the 'reference' TS and the proposed GTS.	The staff agrees with the comment.  The staff revised the DSRS by adding a paragraph III.8.A.iii, which states:  "Comparison of the proposed generic TS and the reference TS should consider design and operational differences between the associated plant designs."
677	16	DSRS Draft for Comment, I.3.A.ii	Typo - third line after '(SRP)' insert a space before 'Section 19.3...'	NuScale recommends correcting this typo.	The staff agrees with the comment. Typo has been corrected.

<b>Comment #</b> <i>(Affiliation: NuScale Power, LLC)</i>	<b>DSRS Section</b>	<b>Paragraph, Item, or Page</b>	<b>Comment / Basis</b>	<b>Commenter Recommendation</b>	<b>NRC Staff Technical Resolution</b>
678	16	DSRS Draft for Comment, III.9.B	Typo - extra space at beginning of paragraph	NuScale recommends correcting this typo.	The staff agrees with the comment. Typo has been corrected.