

**RESPONSE TO PUBLIC COMMENTS ON DRAFT STANDARD REVIEW PLAN SECTIONS FROM CHAPTER 3: Design of Structures, Components, Equipment, and Systems**

On September 29, 2015, a Notice of Opportunity for Public Comment was published in the Federal Register (80 FR 58512) on proposed revisions to certain sections in NUREG-0800, Standard Review Plan (SRP), Chapter 3. These sections have been revised to assist NRC staff review the design of structures, components, equipment, and systems under Title 10 of the Code of Federal Regulations (10 CFR) Parts 50 and 52. The revisions to these SRP sections reflect no changes in staff position; rather they clarify the original intent of these SRP sections using plain language throughout in accordance with the NRC’s Plain Writing Action Plan. Additionally, these revisions reflect operating experience, lessons learned, and updated guidance since the last revision, and address the applicability of regulatory treatment of non-safety systems where appropriate. Comments were received from one (1) commenters, who referred only to Section 3.9.6, draft Revision 4.

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The NRC staff’s review and disposition of the comments is provided in the following table.

<b>No.</b>	<b>Reference</b>	<b>Comment Submissions</b>	<b>NRC Resolution</b>
1	page 3.9.6-14 item H	On page 3.9.6-14 item H, it states, "the application of ASME QME-1-2007 as accepted in Revision 3 to RG 1.100 is one acceptable method for demonstrating the functional design and qualification of RTNSS pumps, valves, and dynamic restraints". This is obviously acceptable to the NRC since it is the same standard that is applied to safety related components in the IST program. The question is, "are there other acceptable methods that the NRC would consider?" Additional wording in the SRP would be helpful to indicate that an alternate method is still possible for non-safety related equipment.	The NRC staff agrees with the commenter that methods to demonstrate the functional design and qualification of pumps, valves, and dynamic restraints within the scope of the Regulatory Treatment of Non-Safety Systems (RTNSS) other than implementation of ASME Standard QME-1-2007, "Qualification of Active Mechanical Equipment Used in Nuclear Power Plants," as accepted in Revision 3 to Regulatory Guide 1.100, "Seismic Qualification of Electrical and Active Mechanical Equipment and Functional Qualification of Active Mechanical Equipment for Nuclear Power Plants," could be justified by the nuclear power plant applicant. Therefore, the staff will include a statement in SRP Section 3.9.6 that the applicant may justify other methods to demonstrate the functional design and qualification of RTNSS pumps, valves, and dynamic restraints.

No.	Reference	Comment Submissions	NRC Resolution
2	General	<p>In several locations including examples on page 3.9.6-23, the NRC has changed the word "should" to "needs to be". This is new wording that appears to be less prescriptive than saying "shall", but it is unclear how the NRC will interpret this. There are other examples where "should" was changed to "shall" which indicates clear intent.</p>	<p>The NRC staff has reviewed the use of "should," "shall," and "needs to be" in draft Revision 4 to SRP Section 3.9.6, and made changes as necessary to clarify the intent of the guidance. For example, the staff has verified that "shall" is used in the context of specific regulatory requirements, COL information item language, and proposed license conditions. The term "should" is used with respect to guidance for the applicant in describing its functional design, qualification, and inservice testing (IST) programs for pumps, valves, and dynamic restraints in its application. Based on its review, the staff has modified SRP Section 3.9.6 to eliminate the term "need" by the use of other terms such as "may," "should," or "require," as appropriate.</p>
3	page 3.9.6-25	<p>On page 3.9.6-25 under (b)(i) it states; "This examination shall also verify the appropriate position of the internal actuating mechanism and proper operation of remote position indicators". This makes the assumption that actuating mechanism is internal which may not be the case. Recommend deleting the word "internal".</p>	<p>The language referenced in the comment is contained in a specific license condition for the preservice testing and operational surveillance of squib valves provided in the combined licenses (COLs) for several nuclear power plants. Therefore, the staff does not consider it appropriate to modify the specific language in SRP Section 3.9.6. The SRP section on page 3.9.6-24 indicates that this license condition is an acceptable example for preservice testing and operational surveillance of squib valves. An applicant could propose a different license condition based on the plant-specific design of the applicable reactor systems and squib valves.</p>