

PMTurkeyCOLPEm Resource

From: Franzone, Steve <Steve.Franzone@fpl.com>
Sent: Wednesday, May 25, 2016 9:05 AM
To: Comar, Manny
Cc: TurkeyCOL Resource; Maher, William; Madden, George
Subject: [External_Sender] RG 1.206, 6-month RG applicability guidance
Attachments: App_1AA_from_PTIN_FSAR_CHAP01.pdf; App1AA_from ML15349A105_Chap1_Lee_rev8.pdf

Manny

I have attached APPENDIX 1AA "CONFORMANCE WITH REGULATORY GUIDES" from both the PTN, Rev 7 & Levy, Rev 8 submittals and I have highlighted the additional regulatory guides (RGs) & revisions which shows the additional RGs we addressed after Levy. Levy submitted 7/30/2008; we submitted 6/30/2009.

In addition, we have reviewed our FSAR Chap. 1, Sec 1.9, Compliance with Regulatory Criteria, and it appears to be consistent with the standard content although not word for word as compared to the Levy's version (e.g. we had different PTN specific COL items).

Thanks

Steve Franzone

NNP Licensing Manager - COLA

"Failure is only the opportunity to begin again more intelligently." ~ Henry Ford

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APPENDIX 1AA CONFORMANCE WITH REGULATORY GUIDES

STD COL 1.9-1

Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
DIVISION 1 - Power Reactors			
Regulatory Guide 1.7, Rev. 3, 3/07 – Control of Combustible Gas Concentrations in Containment			
Conformance of the design aspects with Revision 2 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 3 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
C.2		Conforms	
C.4		Conforms	
Regulatory Guide 1.8, Rev. 3, 5/00 – Qualification and Training of Personnel for Nuclear Power Plants			
C.1		Conforms	
C.2	Section 4 of ANSI/ANS-3.1-1993	Exception	Not able to meet Regulatory Guide 1.8, Rev. 3 qualification requirements for licensed personnel prior to operations.
Regulatory Guide 1.11, Rev. 1, 3/10 – Instrument Lines Penetrating the Primary Reactor Containment			
Conformance with the design aspects is as stated in the DCD. This guidance is completely within the scope of the DCD.			
Regulatory Guide 1.12, Rev. 2, 3/97 – Nuclear Power Plant Instrumentation for Earthquakes			
Conformance of the design aspects is as stated in the DCD. Conformance for programmatic and/or operational aspects is documented below.			
C.3		Conforms	
C.8		Conforms	
Regulatory Guide 1.13, Rev. 2, 3/07 - Spent Fuel Storage Facility Design Basis			
Conformance of the design aspects with Revision 1 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 2 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
C.7		Conforms	
Regulatory Guide 1.20, Rev. 3, 3/07 – Comprehensive Vibration Assessment Program For Reactor Internals During Preoperational and Initial Startup Testing			
Conformance with Revision 2 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.			
Regulatory Guide 1.21, Rev. 1, 6/74 – Measuring Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents From Light-Water-Cooled Nuclear Power Plants			
Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
C.1		Conforms	
C.3-C.5		Conforms	
C.6		Conforms	
C.7-C.14		Conforms	

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Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
PTN COL 1.9-1	Regulatory Guide 1.23, Rev. 1, 3/07 – Meteorological Monitoring Programs for Nuclear Power Plants		
	General	Exception	Sampling interval for temperature and dew point during siting activities based on guidance in effect at the beginning of the program
	General	Exception	See Table 2.3.3-202 .
STD COL 1.9-1	Regulatory Guide 1.26, Rev. 4, 3/07 – Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants		
	Conformance with Revision 3 of the Regulatory Guide for DCD scope of work is as stated in the DCD. Conformance with Revision 4 of this Regulatory Guide for remaining scope is documented below.		
	General	Conforms	
	Regulatory Guide 1.28, Rev. 3, 8/85 – Quality Assurance Program Requirements (Design and Construction)		
	Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.		
	General	Exception	Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.
	Regulatory Guide 1.29, Rev. 4, 3/07 – Seismic Design Classification		
	Conformance with Revision 3 of the Regulatory Guide for DCD scope of work is as stated in the DCD. Conformance with Revision 4 of this Regulatory Guide for remaining scope is documented below.		
	C.4	Conforms	
	Regulatory Guide 1.30, Rev. 0, 8/72 – Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment		
	Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.		
	General	Exception	Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.
	Regulatory Guide 1.32, Rev. 3, 03/04 – Criteria for Power Systems for Nuclear Power Plants		
	Conformance of the design aspects with Revision 2 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 3 of this Regulatory Guide for programmatic and/or operational aspects is documented below.		
	General	Conforms	
	Regulatory Guide 1.33, Rev. 2, 2/78 – Quality Assurance Program Requirements (Operation)		
	C.1	Conforms	
	C.2	Clarification	See separate conformance statement for each identified Regulatory Guide.
	C.3–C.5	Conforms	
	Regulatory Guide 1.37, Rev. 1, 3/07 – Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water Cooled Nuclear Power Plants		
	Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.		
	General	Conforms	

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Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
STD COL 1.9-1	<p>Regulatory Guide 1.38, Rev. 2, 5/77 – Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants</p> <p>Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.</p> <p>General</p> <p style="text-align: center;">Exception</p> <p>Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.</p>		
	<p>Regulatory Guide 1.39, Rev. 2, 9/77 – Housekeeping Requirements for Water-Cooled Nuclear Power Plants</p> <p>Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.</p> <p>General</p> <p style="text-align: center;">Exception</p> <p>Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.</p>		
PTN COL 1.9-1	<p>Regulatory Guide 1.45, Rev. 1, 5/08 – Guidance on Monitoring and Responding to Reactor Coolant System Leakage</p> <p>Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.</p> <p>C.7</p> <p style="text-align: center;">Conforms</p>		
STD COL 1.9-1	<p>Regulatory Guide 1.52, Rev. 3, 6/01 – Design, Inspection and Testing Criteria for Air Filtration and Adsorption Units of Post-Accident Engineered-Safety-Feature Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants</p> <p>Conformance with the design and operational aspects is as stated in the DCD.</p> <p>Regulatory Guide 1.53, Rev. 2, 11/03 – Application of the Single-Failure Criterion to Safety Systems</p> <p>Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.</p> <p>Regulatory Guide 1.54, Rev. 1, 7/00 – Service Level I, II, And III Protective Coatings Applied To Nuclear Power Plants</p> <p>Conformance of the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.</p> <p>General</p> <p style="text-align: center;">Conforms</p> <p>Regulatory Guide 1.57, Rev. 1, 3/07 – Design Limits and Loading Combinations for Metal Primary Reactor Containment System Components</p> <p>Conformance with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.</p>		

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Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
Regulatory Guide 1.59, Rev. 2, 8/77 – Design Basis Floods for Nuclear Power Plants			
STD COL 1.9-1 General		Exception	Regulatory Guide 1.59, Appendix A indicates use of ANSI N170-1976 “Standards for Determining Design Basis Flooding at Power Reactor Sites.” In place of this standard, ANSI/ANS 2.8-1992 “Determining Design Basis Flooding at Power Reactor Sites” was used. ANSI/ANS 2.8-1992 was withdrawn on July 26, 2002. However, a replacement standard has not been issued. NUREG-0800 2.4.3 Revision 4, March 2007 and 2.4.4 Revision 3, March 2007 include ANSI/ANS 2.8-1992 as a reference. ANSI/ANS 2.8-1992 is also specifically identified in the review procedures subsection of NUREG-0800 2.4.4.
Regulatory Guide 1.61, Rev. 1, 3/07 – Damping Values for Seismic Design of Nuclear Power Plants			
Conformance with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.			
Regulatory Guide 1.65, Rev. 0, 10/73 – Materials and Inspections for Reactor Vessel Closure Studs			
Conformance of the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.			
C.3		Conforms	
C.4		Exception	ASME XI ISI criteria for reactor vessel closure stud examinations are applied in lieu of the ASME III NB 2545 and NB 2546 surface examinations. The volumetric examinations currently required by ASME XI provide improved (since 1973) detection of bolting degradation.
Regulatory Guide 1.68, Rev. 3, 3/07 – Initial Test Program for Water-Cooled Nuclear Power Plants			
Conformance with Revision 2 of the Regulatory Guide is documented in the DCD. Conformance of the design aspects is as stated in the DCD. Conformance with Revision 3 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
C2-C.9		Conforms	
Appendix B			
Appendix C			
Regulatory Guide 1.70, Rev. 3, 11/78, Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants (LWR Edition)			
General		Exception	The format and content of the FSAR follow Regulatory Guide 1.206 and the AP1000 Design Control Document as required by Appendix D of 10 CFR Part 52.
Regulatory Guide 1.71, Rev. 1, 3/07 – Welder Qualification for Areas of Limited Accessibility			
Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of the Regulatory Guide during the operational phase (i.e., after the construction phase is completed per the DCD) is documented below.			
General		Conforms	

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Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
STD COL 1.9-1	<p>Regulatory Guide 1.75, Rev. 3, 2/05 – Criteria for Independence of Electrical Safety Systems</p> <p>Conformance with Revision 2 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.</p> <p>Regulatory Guide 1.76, Rev. 1, 3/07 – Design-Basis Tornado and Tornado Missiles for Nuclear Power Plants</p> <p>Conformance with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.</p> <p>Regulatory Guide 1.78, Rev. 1, 12/01 – Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release</p> <p>Conformance with the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.</p> <p>General Conforms</p> <p>Regulatory Guide 1.82, Rev. 3, 11/03 – Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident</p> <p>Conformance with the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.</p> <p>C.1.1.2 Conforms</p> <p>C.1.1.5 Conforms</p> <p>Regulatory Guide 1.83, Rev. 1, 7/75 - Inservice Inspection of Pressurized Water Reactor Steam Generator Tubes</p> <p>Conformance of the design aspects is as stated in the DCD. The programmatic and/or operational aspects are not applicable since this guidance was withdrawn by NRC (74 FR 58324, 11/12/2009).</p>		
PTN COL 1.9-1	<p>Regulatory Guide 1.84, Rev. 34, 10/07 – Design, Fabrication, and Materials Code Case Acceptability, ASME Section III</p> <p>Conformance with Revision 32 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.</p>		
STD COL 1.9-1	<p>Regulatory Guide 1.86, Rev. 0, 6/74 - Termination of Operating Licenses for Nuclear Reactors</p> <p>This Regulatory Guide is outside the scope of the FSAR.</p> <p>Regulatory Guide 1.91, Rev. 1, 2/78 – Evaluations of Explosions Postulated to Occur on Transportation Routes Near Nuclear Power Plants</p> <p>Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.</p> <p>General Conforms</p> <p>Regulatory Guide 1.92, Rev. 2, 07/06 – Combining Modal Responses and Spatial Components in Seismic Response Analysis</p> <p>Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.</p> <p>Regulatory Guide 1.94, Rev. 1, 4/76 – Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants</p> <p>Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.</p> <p>General Exception Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.</p>		

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Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
STD COL 1.9-1	Regulatory Guide 1.97, Rev. 4, 6/06 – Criteria For Accident Monitoring Instrumentation For Nuclear Power Plants		
	Conformance with this Regulatory Guide for programmatic and/or operational aspects is documented below.		
General		Exception	Portable equipment outside the DCD scope conforms to Revision 3 of this Regulatory Guide for consistency with DCD scope since Revision 4 indicates that partial implementation is not advised.
	Regulatory Guide 1.101, Rev. 5, 6/05 – Emergency Response Planning and Preparedness for Nuclear Power Reactors		
General		Exception	Rev. 5 is not applicable for this site. Rev. 3 and 4 are essentially the same except for endorsement of NEI 99-01 which is not directly applicable to the AP1000 passive design. The EP conforms to Rev. 3 and 4 with the exception that the EALs are written with necessary modifications to address the passive plant design.
	Regulatory Guide 1.109, Rev. 1, 10/77 – Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I		
	Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.		
General		Conforms	
	Regulatory Guide 1.110, Rev. 0, 3/76 – Cost-Benefit Analysis for Radwaste Systems for Light-Water-Cooled Nuclear Power Reactors		
	Conformance of the design aspects is as stated in the DCD. Conformance with Revision 0 of this Regulatory Guide for programmatic and/or operational aspects is documented below.		
General		Conforms	
	Regulatory Guide 1.111, Rev. 1, 7/77 – Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors		
General		Conforms	
	Regulatory Guide 1.112, Rev. 1, 3/07 – Calculation of Releases of Radioactive Materials in Gaseous and Liquid Effluents from Light-Water-Cooled Nuclear Power Reactors		
	Conformance of the design aspects with Revision 0-R of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.		
General	ANSI 18.1-1999	Conforms	
	Regulatory Guide 1.113, Rev. 1, 4/77 – Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I		
General		Conforms	
PTN COL 1.9-1	Regulatory Guide 1.114, Rev. 3, 10/08 – Guidance to Operators at the Controls and to Senior Operators in the Control Room of a Nuclear Power Unit		
		Conforms	
STD COL 1.9-1	Regulatory Guide 1.115, Rev. 1, 7/77 – Protection Against Low-Trajectory Turbine Missiles		
	Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.		
General		Conforms	

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STD COL 1.9-1

Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
Regulatory Guide 1.116, Rev. 0-R, 5/77 – Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems			
Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.			
General		Exception	Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.
Regulatory Guide 1.124, Rev. 2, 02/07 – Service Limits and Loading Combinations for Class 1 Linear-Type Supports			
Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.			
Regulatory Guide 1.128, Rev. 2, 2/07 – Installation Design and Installation of Vented Lead-Acid Storage Batteries for Nuclear Power Plants			
Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.			
Regulatory Guide 1.129, Rev. 2, 2/07 – Maintenance, Testing, and Replacement of Vented Lead-Acid Storage Batteries for Nuclear Power Plants			
General	IEEE Std. 450-2002	Exception	Approved Generic Technical Specifications are based on IEEE Std 450-1995.
Regulatory Guide 1.130, Rev. 2, 3/07 - Service Limits and Loading Combinations for Class 1 Plate-And-Shell-Type Supports			
Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.			
Regulatory Guide 1.132, Rev. 2, 10/03 – Site Investigations for Foundations of Nuclear Power Plants			
General		Conforms	
Regulatory Guide 1.133, Rev. 1, 5/81 – Loose-Part Detection Program for the Primary System of Light-Water-Cooled Reactors			
Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
C.2b		Conforms	Procedures are addressed in Section 13.5
C.3a		Conforms	Procedures are addressed in Section 13.5
C.4g		Conforms	Procedures are addressed in Section 13.5
C.4h		Conforms	Procedures are addressed in Section 13.5
C.4i		Conforms	ALARA is addressed in Chapter 12 and Section 13.5
C.4j		Conforms	Training is addressed in Section 13.2
C.6		Exception	Regulatory Guide 1.16 has been withdrawn. Event reporting is performed in accordance with 10 CFR 50.72 and 50.73 utilizing the guidance of NUREG-1022
Regulatory Guide 1.134, Rev. 3, 3/98 – Medical Evaluation of Licensed Personnel at Nuclear Power Plants			
General		Conforms	
Regulatory Guide 1.135, Rev. 0, 9/77 – Normal Water Level and Discharge at Nuclear Power Plants			
Conformance of the design aspects is as stated in the DCD. The programmatic and/or operational aspects are not applicable since this guidance was withdrawn by NRC (74 FR 39349, 08/06/2009).			

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Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
STD COL 1.9-1	<p>Regulatory Guide 1.138, Rev. 2, 12/03 – Laboratory Investigations of Soils and Rocks for Engineering Analysis and Design of Nuclear Power Plants</p> <p>General Conforms</p> <p>Regulatory Guide 1.139, Rev. 0, 5/78 – Guidance for Residual Heat Removal</p> <p>Conformance with the design aspects is as stated in the DCD. The programmatic and/or operational aspects are not applicable since this guidance was withdrawn by NRC (73 FR 32750, 06/10/2008).</p>		
PTN COL 1.9-1	<p>Regulatory Guide 1.143, Rev. 2, 11/01 – Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants</p> <p>Conformance for DCD scope of design is as stated in the DCD. Conformance for site-specific scope of design and for programmatic and/or operational aspects is documented below.</p> <p>General Conforms</p>		
STD COL 1.9-1	<p>Regulatory Guide 1.145, Rev. 1, 11/82 (Revised 2/83 to correct page 1.145-7) – Atmospheric Dispersion Models for Potential Accident Consequence Assessments at Nuclear Power Plants</p> <p>General Conforms</p>		
PTN COL 1.9-1	<p>Regulatory Guide 1.147, Rev. 15, 10/07 – Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1</p> <p>Conformance with Revision 12 of the Regulatory Guide is documented in the DCD. Conformance of the design aspects is as stated in the DCD. Conformance with Revision 15 of this Regulatory Guide for programmatic and/or operational aspects is documented below.</p> <p>General Conforms</p>		
STD COL 1.9-1	<p>Regulatory Guide 1.149, Rev. 3, 10/01 – Nuclear Power Plant Simulation Facilities for Use in Operator Training and License Examinations</p> <p>C.1 Conforms</p> <p>During cold licensing, training is conducted using a simulator with limited scope in accordance with Appendix D of ANSI/ANS-3.5-1998. Operator Licensing examinations are conducted on a simulator meeting the applicable requirements of ANSI/ANS-3.5-1998.</p> <p>Regulatory Guide 1.150, Rev. 1, 2/83 – Ultrasonic Testing of Reactor Vessel Welds During Preservice and Inservice Examinations</p> <p>Conformance with the design aspects is as stated in the DCD. The programmatic and/or operational aspects are not applicable since this guidance was withdrawn by NRC (73 FR 7766, 02/11/2008).</p> <p>Regulatory Guide 1.152, Rev. 2, 1/06 – Criteria for Use of Computers in Safety Systems of Nuclear Power Plants</p> <p>Conformance of the design aspects with Revision 1 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 2 of this Regulatory Guide for programmatic and/or operational aspects is documented below.</p> <p>General Exception</p> <p>The Cyber Security Program is based on March 2009 revisions of the 10 CFR 73.54 regulations in lieu of Revision 2 of this Regulatory Guide.</p> <p>Regulatory Guide 1.154, Rev. 0, 1/87 – Format and Content of Plant-Specific Pressurized Thermal Shock Safety Analysis Reports for Pressurized Water Reactors</p> <p>General Conforms</p>		

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STD COL 1.9-1

Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
Regulatory Guide 1.159, Rev. 1, 10/03 – Assuring the Availability of Funds for Decommissioning Nuclear Reactors			
General		N/A	This Regulatory Guide is outside the scope of the FSAR.
Regulatory Guide 1.160, Rev. 2, 3/97 – Monitoring the Effectiveness of Maintenance at Nuclear Power Plants			
General		Conforms	
Regulatory Guide 1.162, Rev. 0, 2/96 – Format and Content of Report for Thermal Annealing of Reactor Pressure Vessels			
		N/A	This Regulatory Guide is outside the scope of the FSAR.
Regulatory Guide 1.163, Rev. 0, 9/95 – Performance-Based Containment Leak-Test Program			
Conformance of the design aspects is as stated in the DCD. Conformance with Revision 0 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
General		Conforms	
Regulatory Guide 1.165, Rev. 0, 3/97 – Identification and Characterization of Seismic Sources and Determination of Safe Shutdown Earthquake Ground Motion			
General		N/A	Seismic analysis performed in accordance with Regulatory Guide 1.208.
Regulatory Guide 1.166, Rev. 0, 3/97 – Pre-Earthquake Planning and Immediate Nuclear Power Plant Operator Post earthquake Actions			
General		Conforms	
Regulatory Guide 1.167, Rev. 0, 3/97 – Restart of a Nuclear Power Plant Shut Down by a Seismic Event			
General		Conforms	
Regulatory Guide 1.168, Rev. 1, 2/04 – Verification, Validation, Reviews, and Audits for Digital Computer Software Used in Safety Systems of Nuclear Power Plants			
Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
General		Conforms	
Regulatory Guide 1.174, Rev. 1, 11/02 – An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis			
This Regulatory Guide is outside the scope of the FSAR.			
Regulatory Guide 1.175, Rev. 0, 8/98 – An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing			
Risk-informed inservice testing is not being utilized for this plant.			
Regulatory Guide 1.177, Rev. 0, 8/98 – An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications			
General		Conforms	
Regulatory Guide 1.178, Rev. 1, 9/03 – An Approach for Plant-Specific Risk-Informed Decisionmaking for Inservice Inspection of Piping			
Risk-informed inservice inspection is not being utilized for this plant.			
Regulatory Guide 1.179, Rev. 0, 1/99 – Standard Format and Content of License Termination Plans for Nuclear Power Reactors			
		N/A	This Regulatory Guide is outside the scope of the FSAR.

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STD COL 1.9-1

Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
Regulatory Guide 1.180, Rev. 1, 10/03 – Guidelines for Evaluating Electromagnetic and Radio-Frequency Interference in Safety-Related Instrumentation and Control Systems			
Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
General		Conforms	Exclusion zones are established through administrative controls to prohibit the activation of portable EMI/RFI emitters (e.g., welders and transceivers) in areas where safety-related I&C systems are installed.
Regulatory Guide 1.181, Rev. 0, 9/99 – Content of the Updated Final Safety Analysis Report in Accordance with 10 CFR 50.71(e)			
General		Conforms	
Regulatory Guide 1.182, Rev. 0, 5/00 – Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants			
General		Conforms	
Regulatory Guide 1.184, Rev. 0, 7/00 – Decommissioning of Nuclear Power Reactors			
		N/A	This Regulatory Guide is outside the scope of the FSAR.
Regulatory Guide 1.185, Rev. 0, 7/00 – Standard Format and Content for Post-shutdown Decommissioning Activities Report			
		N/A	This Regulatory Guide is outside the scope of the FSAR.
Regulatory Guide 1.186, Rev. 0, 12/00 – Guidance and Examples for Identifying 10 CFR 50.2 Design Bases			
		N/A	This Regulatory Guide is outside the scope of the FSAR.
Regulatory Guide 1.187, Rev. 0, 11/00 – Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments			
General		Conforms	
Regulatory Guide 1.188, Rev. 1, 9/05 – Standard Format and Content for Applications To Renew Nuclear Power Plant Operating Licenses			
		N/A	This Regulatory Guide is outside the scope of the FSAR.
Regulatory Guide 1.189, Rev. 1, 3/07 – Fire Protection for Nuclear Power Plants			
Conformance with Revision 0 of the Regulatory Guide is documented in the DCD. Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
General		Conforms	
Regulatory Guide 1.191, Rev. 0, 5/01 – Fire Protection Program for Nuclear Power Plants During Decommissioning and Permanent Shutdown			
		N/A	This Regulatory Guide is outside the scope of the FSAR.
Regulatory Guide 1.192, Rev. 0, 6/03 – Operation and Maintenance Code Case Acceptability, ASME OM Code			
General		Conforms	
Regulatory Guide 1.193, Rev. 1, 8/05 – ASME Code Cases Not Approved for Use			
General		Conforms	

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Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
Regulatory Guide 1.194, Rev. 0, 6/03 – Atmospheric Relative Concentrations for Control Room Radiological Habitability Assessments at Nuclear Power Plants			
General		Conforms	
Regulatory Guide 1.195, Rev. 0, 5/03 – Methods and Assumptions for Evaluating Radiological Consequences of Design Basis Accidents at Light-Water Nuclear Power Reactors			
This Regulatory Guide is not applicable to the AP1000 certified design.			
Regulatory Guide 1.196, Rev. 1, 1/07 – Control Room Habitability at Light-Water Nuclear Power Reactors			
Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below. This Regulatory Guide is not applicable to the AP1000 certified design.			
General		Conforms	
Regulatory Guide 1.197, Rev. 0, 5/03 – Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors			
Conformance with the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.			
General		Conforms	
Regulatory Guide 1.198, Rev. 0, 11/03 – Procedures and Criteria for Assessing Seismic Soil Liquefaction at Nuclear Power Plant Sites			
General		Conforms	
Regulatory Guide 1.199, Rev. 0, 11/03 – Anchoring Components and Structural Supports in Concrete			
Conformance with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.			
Regulatory Guide 1.200, Rev. 1, 1/07 – An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities			
General		Conforms	
Regulatory Guide 1.201, Rev. 1, 5/06 – Guidelines for Categorizing Structures, Systems, and Components in Nuclear Power Plants According to Their Safety Significance			
This Regulatory Guide is not applicable to the AP1000 certified design.			
Regulatory Guide 1.202, Rev. 0, 2/05 – Standard Format and Content of Decommissioning Cost Estimates for Nuclear Power Reactors			
This Regulatory Guide is outside the scope of the FSAR.			
Regulatory Guide 1.203, Rev. 0, 12/05 – Transient and Accident Analysis Methods			
This Regulatory Guide is not applicable to the AP1000 certified design.			
Regulatory Guide 1.204, Rev. 0, 11/05 – Guidelines for Lightning Protection of Nuclear Power Plants			
General		Conforms	
Regulatory Guide 1.205, Rev. 0, 5/06 – Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants			
This Regulatory Guide is not applicable to the AP1000 certified design.			
Regulatory Guide 1.206, Rev. 0, 6/07 – Combined License Applications for Nuclear Power Plants (LWR Edition)			
General	Format	Conforms	
General	Content	Exception	Exceptions to content are identified in Table 1.9-202 .

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Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
STD COL 1.9-1	<p>Regulatory Guide 1.207, Rev. 0, 3/07 – Guidelines for Evaluating Fatigue Analyses Incorporating the Life Reduction of Metal Components Due to the Effects of the Light-Water Reactor Environment for New Reactors</p> <p>This Regulatory Guide is not applicable to the AP1000 certified design.</p> <p>Regulatory Guide 1.208, Rev. 0, 3/07 – A Performance-Based Approach to Define the Site-Specific Earthquake Ground Motion</p> <p>General Conforms</p> <p>Regulatory Guide 1.209, Rev. 0, 3/07 – Guidelines for Environmental Qualification of Safety-Related Computer-Based Instrumentation and Control Systems in Nuclear Power Plants</p> <p>This Regulatory Guide is not applicable to the AP1000 certified design.</p>		
PTN COL 1.9-1	<p>Regulatory Guide 1.210, Rev. 0, 06/08 – Qualification of Safety-Related Battery Chargers and Inverters for Nuclear Power Plants</p> <p>This Regulatory Guide is not applicable to the AP1000 certified design.</p> <p>Regulatory Guide 1.212, Rev. 0, 11/08 – Sizing of Large Lead-Acid Storage Batteries</p> <p>General IEEE Std 485-1997 Conforms TS Bases 3.8.1 states that criteria defined in IEEE-485 are used.</p> <p>Regulatory Guide 1.221, Rev. 0, 10/11 – Design-Basis Hurricane and Hurricane Missiles for Nuclear Power Plants</p> <p>This Regulatory Guide is not applicable to the AP1000 certified design.</p>		
STD COL 1.9-1	<p>DIVISION 4 – Environmental and Siting</p> <p>Regulatory Guide 4.7 Rev. 2, 4/98 – General Site Suitability Criteria for Nuclear Power Stations</p> <p>General Conforms</p>		
PTN COL 1.9-1	<p>Regulatory Guide 4.15, Rev. 2, 7/07 – Quality Assurance for Radiological Monitoring Programs (Inception through Normal Operations to License Termination) – Effluent Streams and the Environment</p> <p>General Conforms</p> <p>Regulatory Guide 4.21, Rev. 0, 6/08 – Minimization of Contamination and Radioactive Waste Generation: Life-Cycle Planning</p> <p>General Conforms</p>		
STD COL 1.9-1	<p>DIVISION 5 – Materials and Plant Protection</p> <p>The plant-specific physical security plans include no substantive deviations from the NRC-endorsed template in NEI 03-12, Rev. 6. Therefore, the degree of conformance with Division 5 regulatory guides for the Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan is consistent with the degree of conformance of NEI 03-12, Rev. 6.</p> <p>Regulatory Guide 5.9, Rev. 2, 12/83 – Guidelines for Germanium Spectroscopy Systems for Measurement of Special Nuclear Material</p> <p>N/A This Regulatory Guide is outside the scope of the FSAR.</p> <p>Regulatory Guide 5.12, Rev. 0, 11/73 – General Use of Locks in the Protection and Control of Facilities and Special Nuclear Materials</p> <p>Conformance of the design aspects is as stated in the DCD.</p> <p>N/A This Regulatory Guide is outside the scope of the FSAR.</p>		

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Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
Regulatory Guide 5.65, Rev. 0, 9/86 – Vital Area Access Controls, Protection of Physical Security Equipment, and Key and Lock Controls			
Conformance of the design aspects is as stated in the DCD.			
		N/A	This Regulatory Guide is outside the scope of the FSAR.
Regulatory Guide 5.71, Rev. 0, 1/10 – Cyber Security Programs for Nuclear Facilities			
Conformance with regulatory positions C.1 through C.5 of Regulatory Guide 5.71, Rev. 0, is as stated in the Cyber Security Plan (CSP), with exceptions to the guidance as noted in Attachment A of the CSP.			
DIVISION 8 – Occupational Health			
Regulatory Guide 8.2, Rev. 0, 2/73 – Guide for Administrative Practices in Radiation Monitoring			
General	10 CFR Part 20; ANSI 13.2-1969	Exception	The reference to 10 CFR 20.401 is no longer valid in the current version of 10 CFR Part 20. ANSI N13.2-1969 was reaffirmed in 1988.
Regulatory Guide 8.4, Rev. 0, 2/73 - Direct-Reading and Indirect-Reading Pocket Dosimeters			
General	10 CFR Part 20 ANSI N13.5-1972	Exception	The reference to 10 CFR 20.202 (a) and 20.401 is no longer valid in the current version of 10 CFR Part 20. ANSI N13.5-1972 was reaffirmed in 1989. The two performance criteria specified in Regulatory Guide 8.4 (accuracy and leakage) for these devices are met using acceptance standards in ANSI N322-1997 "American National Standard Inspection, Test, Construction, and Performance Requirements for Direct Reading Electrostatic/Electroscope Type Dosimeters".
Regulatory Guide 8.5, Rev. 1, 3/81 - Criticality and Other Interior Evacuation Signals			
General		Conforms	
Regulatory Guide 8.6, Rev. 0, 5/73 - Standard Test Procedure for Geiger-Muller Counters			
General		Exception	Instrument calibration program is based upon criteria in ANSI N323A-1997 (with 2004 Correction Sheet) "Radiation Protection Instrumentation Test and Calibration, Portable Survey Instruments." The ANSI 42.3-1969 Standard is no longer recognized as sufficient for calibration of modern instruments.

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Criteria Selection	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
Regulatory Guide 8.7, Rev. 2, 11/05 - Instructions for Recording and Reporting Occupational Radiation Dose Data			
General		Conforms	
Regulatory Guide 8.8, Rev. 3, 6/78 – Information Relevant to Ensuring That Occupational Radiation Exposures at Nuclear Power Stations Will Be As Low As Is Reasonably Achievable			
Conformance of the design aspects is as stated in the DCD. Conformance with Revision 3 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
C.1		Conforms	
C.3.a		Conforms	
C.3.b		Exception	Regulatory Guide 1.16 C.1.b.(3) data is no longer reported. Reporting per C.1.b(2) is also no longer required.
C.3.c		Conforms	
C.4.b-C.4.d	ANSI Z-88.2, Regulatory Guide 8.15, NUREG-0041	Conforms	Conformance is with the latest revision of NUREG-0041.
Regulatory Guide 8.9, Rev. 1, 7/93 – Acceptable Concepts, Models, Equations, and Assumptions for a Bioassay Program			
General		Conforms	
Regulatory Guide 8.10, Rev. 1-R, 5/77 – Operating Philosophy For Maintaining Occupational Radiation Exposures as Low as is Reasonably Achievable			
General		Conforms	
Regulatory Guide 8.13, Rev. 3, 6/99 – Instruction Concerning Prenatal Radiation Exposure			
General		Conforms	
Regulatory Guide 8.15, Rev. 1, 10/99 – Acceptable Programs for Respiratory Protection			
General		Conforms	
Regulatory Guide 8.27, Rev. 0, 3/81 – Radiation Protection Training for Personnel at Light-Water-Cooled Nuclear Power Plants			
General		Conforms	
Regulatory Guide 8.28, Rev. 0, 8/81 – Audible-Alarm Dosimeters			
General	ANSI N13.27- 1981	Conforms	
Regulatory Guide 8.29, Rev. 1, 2/96 – Instruction Concerning Risks from Occupational Radiation Exposure			
General		Conforms	
Regulatory Guide 8.34, Rev. 0, 7/92 – Monitoring Criteria and Methods To Calculate Occupational Radiation Doses			
General		Conforms	
Regulatory Guide 8.35, Rev. 0, 6/92 – Planned Special Exposures			
General		Conforms	
Regulatory Guide 8.36, Rev. 0, 7/92 – Radiation Dose to the Embryo/Fetus			
General		Conforms	
Regulatory Guide 8.38, Rev. 1, 5/06 – Control of Access to High and Very High Radiation Areas in Nuclear Power Plants			
Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
General		Conforms	

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Notes:

(1) - Above stated general alternatives regarding the use of previous revisions of the Regulatory Guide for design aspects as stated in the DCD is provided to preserve the finality of the certified design. Further, each stated conformance with the programmatic and/or operational aspects is only to the extent that a design change or departure from the approved DCD is not required to implement those programmatic and/or operational aspects. As the operational and programmatic aspects become more fully defined (for example, during the preparation, approval, or initial implementation of plant procedures), there exists a potential that a conflict could be identified between the design as certified in the DCD and the programmatic and/or operational aspects of the guidance. In such cases, the design certification (rule) becomes the controlling factor, and the design conformance to the Regulatory Guide is per the revision stated in the DCD.

(2) - A "Criteria Section" entry of "General" indicates a scope for the conformance statement of "all regulatory guide positions related to programmatic and/or operational aspects." Thus, an associated conformance statement of "Conforms" indicates that the applicant "complies with all regulatory guide positions related to programmatic and/or operational aspects."

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APPENDIX 1AA CONFORMANCE WITH REGULATORY GUIDES

Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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STD COL 1.9-1

DIVISION 1- Power Reactors

Regulatory Guide 1.7, Rev. 3, 03/07 – Control of Combustible Gas Concentrations in Containment

Conformance of the design aspects with Revision 2 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 3 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

C.2 Conforms

C.4 Conforms

Regulatory Guide 1.8, Rev. 3, 5/00 – Qualification and Training of Personnel for Nuclear Power Plants

C.1 Conforms

C.2	Section 4 of ANSI/ANS-3.1-1993	Exception	Not able to meet Regulatory Guide 1.8, Rev. 3 qualification requirements for licensed personnel prior to operations.
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Regulatory Guide 1.11, Rev. 1, 3/10 – Instrument Lines Penetrating the Primary Reactor Containment

Conformance with the design aspects is as stated in the DCD. This guidance is completely within the scope of the DCD.

Regulatory Guide 1.12, Rev. 2, 3/97 – Nuclear Power Plant Instrumentation for Earthquakes

Conformance of the design aspects is as stated in the DCD. Conformance for programmatic and/or operational aspects is documented below.

C.3 Conforms

C.8 Conforms

Regulatory Guide 1.13, Rev. 2, 03/07 - Spent Fuel Storage Facility Design Basis

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
STD COL 1.9-1			<p>Conformance of the design aspects with Revision 1 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 2 of this Regulatory Guide for programmatic and/or operational aspects is documented below.</p> <p>C.7 Conforms</p> <p>Regulatory Guide 1.20, Rev. 3, 3/07 – Comprehensive Vibration Assessment Program For Reactor Internals During Preoperational and Initial Startup Testing</p> <p>Conformance with Revision 2 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.</p> <p>Regulatory Guide 1.21, Rev. 1, 6/74 – Measuring Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents From Light-Water-Cooled Nuclear Power Plants</p> <p>Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.</p> <p>C.1 Conforms</p> <p>C.3-C.5 Conforms</p> <p>C.6 Conforms</p> <p>C.7-C.14 Conforms</p>
LNP COL 1.9-1			<p>Regulatory Guide 1.23, Rev. 1, 3/07 –Meteorological Monitoring Programs for Nuclear Power Plants</p> <p>C.1-C.5 Conforms</p>

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
LNP COL 1.9-1	C.6	Exception	The lowest wind speed Category (≤ 5 m/s) in Table 3 was revised from the RG 1.23 guidance to reflect two categories (i.e., ≤ 4 m/s to represent the manufacturer's stated instrument threshold, and 0.4 to 5.0 m/s). The additional lowest wind speed category was included because of the high frequency of observed light, but non-calm winds at the LNP site and the low starting speed of the instrumentation. Approximately 19 percent of all observed winds were assigned to the lowest wind speed category after a detailed review of the meteorological data.
	C.7-C.9	Conforms	
STD COL 1.9-1	<p>Regulatory Guide 1.26, Rev. 4, 3/07 – Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants</p> <p>Conformance with Revision 3 of the Regulatory Guide for DCD scope of work is as stated in the DCD. Conformance with Revision 4 of this Regulatory Guide for remaining scope is documented below.</p> <p>General Conforms</p> <p>Regulatory Guide 1.28, Rev. 3, 8/85 – Quality Assurance Program Requirements (Design and Construction)</p> <p>Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.</p> <p>General Exception Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.</p> <p>Regulatory Guide 1.29, Rev. 4, 3/07 – Seismic Design Classification</p> <p>Conformance with Revision 3 of the Regulatory Guide for DCD scope of work is as stated in the DCD. Conformance with Revision 4 of this Regulatory Guide for remaining scope is documented below.</p>		

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
STD COL 1.9-1	C.4	Conforms	
			<p>Regulatory Guide 1.30, Rev. 0, 8/72 – Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment</p> <p>Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.</p> <p>General Exception Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.</p> <p>Regulatory Guide 1.32, Rev. 3, 03/04 – Criteria for Power Systems for Nuclear Power Plants</p> <p>Conformance of the design aspects with Revision 2 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 3 of this Regulatory Guide for programmatic and/or operational aspects is documented below.</p> <p>General Conforms</p>
LNP COL 1.9-1			<p>Regulatory Guide 1.33, Rev. 2, 2/78 – Quality Assurance Program Requirements (Operation)</p> <p>General Exception The QAPD identified in Section 17.5 follows NQA-1 and NEI 06-14A, August 2010, rather than the older standards referenced in Regulatory Guide 1.33.</p>
STD COL 1.9-1			<p>Regulatory Guide 1.37, Rev. 1, 3/07 – Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water Cooled Nuclear Power Plants</p> <p>Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.</p> <p>General Conforms</p> <p>Regulatory Guide 1.38, Rev. 2, 5/77 – Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants</p>

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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STD COL 1.9-1

Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.

General	Exception	Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.
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Regulatory Guide 1.39, Rev. 2, 9/77 – Housekeeping Requirements for Water-Cooled Nuclear Power Plants

Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.

General	Exception	Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.
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Regulatory Guide 1.45, Rev. 0, 5/73 – Reactor Coolant Pressure Boundary Leakage Detection Systems

Conformance of the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.

C.7	Conforms
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LNP DEP 6.4-1

Regulatory Guide 1.52, Rev. 3, 6/01 – Design, Inspection and Testing Criteria for Air Filtration and Adsorption Units of Post-Accident Engineered-Safety-Feature Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants

Conformance with the design and operational aspects is as stated in the DCD, with the exception of Criteria Section C.4.9 and Table 1. Conformance with Section C.4.9 and Table 1 is documented below.

C.4.9	Conforms
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Table 1	Conforms
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STD COL 1.9-1

Regulatory Guide 1.53, Rev. 2, 11/03 – Application of the Single-Failure Criterion to Safety Systems

Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Regulatory Guide 1.54, Rev. 1, 7/00 – Service Level I, II, And III Protective Coatings Applied To Nuclear Power Plants

Conformance of the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.

General	Conforms
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Regulatory Guide 1.57, Rev. 1, 3/07 – Design Limits and Loading Combinations for Metal Primary Reactor Containment System Components

Conformance with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

Regulatory Guide 1.59, Rev. 2, 8/77 – Design Basis Floods for Nuclear Power Plants

General	Exception	<p>Regulatory Guide 1.59, Appendix A indicates use of ANSI N170-1976 “Standards for Determining Design Basis Flooding at Power Reactor Sites.” In place of this standard, ANSI/ANS 2.8-1992 “Determining Design Basis Flooding at Power Reactor Sites” was used.</p> <p>ANSI/ANS 2.8-1992 was withdrawn on July 26, 2002. However, a replacement standard has not been issued.</p> <p>NUREG-0800 2.4.3 Revision 4, March 2007 and 2.4.4 Revision 3, March 2007 include ANSI/ANS 2.8-1992 as a reference. ANSI/ANS 2.8-1992 is also specifically identified in the review procedures subsection of NUREG-0800 2.4.4.</p>
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STD COL 1.9-1

Regulatory Guide 1.61, Rev. 1, 3/07 – Damping Values for Seismic Design of Nuclear Power Plants

Conformance with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Regulatory Guide 1.65, Rev. 0, 10/73 – Materials and Inspections for Reactor Vessel Closure Studs

Conformance of the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.

C.3		Conforms	
C.4		Exception	ASME XI ISI criteria for reactor vessel closure stud examinations are applied in lieu of the ASME III NB 2545 and NB 2546 surface examinations. The volumetric examinations currently required by ASME XI provide improved (since 1973) detection of bolting degradation.

Regulatory Guide 1.68, Rev. 3, 3/07 – Initial Test Program for Water-Cooled Nuclear Power Plants

Conformance with Revision 2 of the Regulatory Guide is documented in the DCD. Conformance of the design aspects is as stated in the DCD. Conformance with Revision 3 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

C.2-C.9 Appendix B Appendix C		Conforms	
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STD COL 1.9-1

Regulatory Guide 1.70, Rev. 3, 11/78, Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants (LWR Edition)

General		Exception	The format and content of the FSAR follow Regulatory Guide 1.206 and the AP1000 Design Control Document as required by Appendix D of 10 CFR Part 52.
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Regulatory Guide 1.71, Rev. 1, 3/07 – Welder Qualification for Areas of Limited Accessibility

Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of the Regulatory Guide during the operational phase (i.e., after the construction phase is completed per the DCD) is documented below.

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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General		Conforms	
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Regulatory Guide 1.75, Rev. 3, 2/05 – Criteria for Independence of Electrical Safety Systems

Conformance with Revision 2 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

Regulatory Guide 1.76, Rev. 1, 3/07 – Design-Basis Tornado and Tornado Missiles for Nuclear Power Plants

Conformance with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

Regulatory Guide 1.78, Rev. 1, 12/01 – Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release

Conformance with the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.

General		Conforms	
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Regulatory Guide 1.82, Rev. 3, 11/03 – Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident

Conformance with the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.

STD COL 1.9-1	C.1.1.2	Conforms	
	C.1.1.5	Conforms	

Regulatory Guide 1.83, Rev. 1, 7/75 – Inservice Inspection of Pressurized Water Reactor Steam Generator Tubes

Conformance of the design aspects is as stated in the DCD. The programmatic and/or operational aspects are not applicable since this guidance was withdrawn by NRC (74 FR 58324, 11/12/2009).

Regulatory Guide 1.84, Rev. 33, 8/05 – Design, Fabrication, and Materials Code Case Acceptability, ASME Section III

Conformance with Revision 32 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Regulatory Guide 1.86, Rev. 0, 6/74 - Termination of Operating Licenses for Nuclear Reactors

This Regulatory Guide is outside the scope of the FSAR.

Regulatory Guide 1.91, Rev. 1, 2/78 – Evaluations of Explosions Postulated to Occur on Transportation Routes Near Nuclear Power Plants

Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General	Conforms
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Regulatory Guide 1.92, Rev. 2, 07/06 – Combining Modal Responses and Spatial Components in Seismic Response Analysis

Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

Regulatory Guide 1.94, Rev. 1, 4/76 – Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants

Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.

STD COL 1.9-1	General	Exception	Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.
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Regulatory Guide 1.97, Rev. 4, 6/06 – Criteria For Accident Monitoring Instrumentation For Nuclear Power Plants

Conformance with Revision 3 of the Regulatory Guide is as stated in the DCD. Conformance with this Regulatory Guide for programmatic and/or operational aspects is documented below.

General	Exception	Portable equipment outside the DCD scope conforms to Revision 3 of this Regulatory Guide for consistency with DCD scope since Revision 4 indicates that partial implementation is not advised.
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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Regulatory Guide 1.101, Rev. 5, 6/05 – Emergency Response Planning and Preparedness for Nuclear Power Reactors

General		Exception	Rev. 5 is not applicable for this site. Rev. 3 and 4 are essentially the same except for endorsement of NEI 99-01 which is not directly applicable to the AP1000 passive design. The EP conforms to Rev. 3 and 4 with the exception that the EALs are written with necessary modifications to address the passive plant design.
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Regulatory Guide 1.109, Rev. 1, 10/77 – Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I

Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General		Conforms	
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Regulatory Guide 1.110, Rev. 0, 3/76 – Cost-Benefit Analysis for Radwaste Systems for Light-Water-Cooled Nuclear Power Reactors

STD COL 1.9-1

Conformance of the design aspects is as stated in the DCD. Conformance with Revision 0 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General		Conforms	
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Regulatory Guide 1.111, Rev. 1, 7/77 – Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors

General		Conforms	
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Regulatory Guide 1.112, Rev. 1, 3/07 – Calculation of Releases of Radioactive Materials in Gaseous and Liquid Effluents from Light-Water-Cooled Nuclear Power Reactors

Conformance of the design aspects with Revision 0-R of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

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General	ANSI 18.1-1999	Conforms	
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Regulatory Guide 1.113, Rev. 1, 4/77 – Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I

General		Conforms	
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Regulatory Guide 1.114, Rev. 2, 5/89 – Guidance to Operators at the Controls and to Senior Operators in the Control Room of a Nuclear Power Unit

General		Conforms	
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Regulatory Guide 1.115, Rev. 1, 7/77 – Protection Against Low-Trajectory Turbine Missiles

Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General		Conforms	
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Regulatory Guide 1.116, Rev. 0-R, 5/77 – Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems

STD COL 1.9-1 Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.

General	Exception	Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.
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Regulatory Guide 1.124, Rev. 2, 02/07 – Service Limits and Loading Combinations for Class 1 Linear-Type Supports

Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

Regulatory Guide 1.128, Rev. 2, 2/07 – Installation Design and Installation of Vented Lead-Acid Storage Batteries for Nuclear Power Plants

Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Regulatory Guide 1.129, Rev. 2, 2/07 – Maintenance, Testing, and Replacement of Vented Lead-Acid Storage Batteries for Nuclear Power Plants

General	IEEE Std. 450-2002	Exception	Approved Generic Technical Specifications are based on IEEE Std 450-1995.
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Regulatory Guide 1.130, Rev. 2, 3/07 - Service Limits and Loading Combinations for Class 1 Plate-And-Shell-Type Supports

Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

Regulatory Guide 1.132, Rev. 2, 10/03 – Site Investigations for Foundations of Nuclear Power Plants

General	Conforms
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Regulatory Guide 1.133, Rev. 1, 5/81 – Loose-Part Detection Program for the Primary System of Light-Water-Cooled Reactors

Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

STD COL 1.9-1	C.2b	Conforms	Procedures are addressed in Section 13.5
	C.3a	Conforms	Procedures are addressed in Section 13.5
	C.4g	Conforms	Procedures are addressed in Section 13.5
	C.4h	Conforms	Procedures are addressed in Section 13.5
	C.4i	Conforms	ALARA is addressed in Chapter 12 and Section 13.5
	C.4j	Conforms	Training is addressed in Section 13.2

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
C.6		Exception	Regulatory Guide 1.16 has been withdrawn. Event reporting is performed in accordance with 10 CFR 50.72 and 50.73 utilizing the guidance of NUREG-1022.

Regulatory Guide 1.134, Rev. 3, 3/98 – Medical Evaluation of Licensed Personnel at Nuclear Power Plants

General Conforms

Regulatory Guide 1.135, Rev. 0, 9/77 – Normal Water Level and Discharge at Nuclear Power Plants

Conformance of the design aspects is as stated in the DCD. The programmatic and/or operational aspects are not applicable since this guidance was withdrawn by NRC (74 FR 39349, 08/06/2009).

Regulatory Guide 1.138, Rev. 2, 12/03 – Laboratory Investigations of Soils and Rocks for Engineering Analysis and Design of Nuclear Power Plants

General Conforms

Regulatory Guide 1.139, Rev. 0, 5/78 – Guidance for Residual Heat Removal

Conformance with the design aspects is as stated in the DCD. The programmatic and/or operational aspects are not applicable since this guidance was withdrawn by NRC (73 FR 32750, 06/10/2008).

STD COL 1.9-1

Regulatory Guide 1.143, Rev. 2, 11/01 – Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants

Conformance of the design aspects is as stated in the DCD. Conformance with Revision 2 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General Conforms

Regulatory Guide 1.145, Rev. 1, 11/82 (Revised 2/83 to correct page 1.145-7) – Atmospheric Dispersion Models for Potential Accident Consequence Assessments at Nuclear Power Plants

General Conforms

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Regulatory Guide 1.147, Rev. 15, 10/07 – Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1

Conformance with Revision 12 of the Regulatory Guide is documented in the DCD. Conformance of the design aspects is as stated in the DCD. Conformance with Revision 15 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General Conforms

Regulatory Guide 1.149, Rev. 3, 10/01 – Nuclear Power Plant Simulation Facilities for Use in Operator Training and License Examinations

C.1	Conforms	During cold licensing, training is conducted using a simulator with limited scope in accordance with Appendix D of ANSI/ANS-3.5-1998. Operator Licensing examinations are conducted on a simulator meeting the applicable requirements of ANSI/ANS-3.5-1998.
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Regulatory Guide 1.150, Rev. 1, 2/83 – Ultrasonic Testing of Reactor Vessel Welds During Preservice and Inservice Examinations

Conformance with the design aspects is as stated in the DCD. The programmatic and/or operational aspects are not applicable since this guidance was withdrawn by NRC (73 FR 7766, 2/11/2008).

STD COL 1.9-1

Regulatory Guide 1.152, Rev. 2, 1/06 – Criteria for Use of Computer Systems in Safety Systems of Nuclear Power Plants

Conformance of the design aspects with Revision 1 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 2 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General	Exception	The Cyber Security Program is based on March 2009 revisions of the 10 CFR 73.54 regulations in lieu of Revision 2 of this Regulatory Guide.
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Regulatory Guide 1.154, Rev. 0, 1/87 – Format and Content of Plant-Specific Pressurized Thermal Shock Safety Analysis Reports for Pressurized Water Reactors

General Conforms

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Regulatory Guide 1.159, Rev. 1, 10/03 – Assuring the Availability of Funds for Decommissioning Nuclear Reactors

General		N/A	This Regulatory Guide is outside the scope of the FSAR.
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Regulatory Guide 1.160, Rev. 2, 3/97 – Monitoring the Effectiveness of Maintenance at Nuclear Power Plants

General		Conforms	
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Regulatory Guide 1.162, Rev. 0, 2/96 – Format and Content of Report for Thermal Annealing of Reactor Pressure Vessels

		N/A	This Regulatory Guide is outside the scope of the FSAR.
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Regulatory Guide 1.163, Rev. 0, 9/95 – Performance-Based Containment Leak-Test Program

Conformance of the design aspects is as stated in the DCD. Conformance with Revision 0 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General		Conforms	
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STD COL 1.9-1

Regulatory Guide 1.165, Rev. 0, 3/97 – Identification and Characterization of Seismic Sources and Determination of Safe Shutdown Earthquake Ground Motion

General		N/A	Seismic analysis performed in accordance with Regulatory Guide 1.208.
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Regulatory Guide 1.166, Rev. 0, 3/97 – Pre-Earthquake Planning and Immediate Nuclear Power Plant Operator Postearthquake Actions

General		Conforms	
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Regulatory Guide 1.167, Rev. 0, 3/97 – Restart of a Nuclear Power Plant Shut Down by a Seismic Event

General		Conforms	
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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Regulatory Guide 1.168, Rev. 1, 2/04 – Verification, Validation, Reviews, and Audits for Digital Computer Software Used in Safety Systems of Nuclear Power Plants

Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General Conforms

Regulatory Guide 1.174, Rev. 1, 11/02 – An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis

This Regulatory Guide is outside the scope of the FSAR.

Regulatory Guide 1.175, Rev. 0, 8/98 – An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing

Risk-informed inservice testing is not being utilized for this plant.

Regulatory Guide 1.177, Rev. 0, 8/98 – An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications

General Conforms

Regulatory Guide 1.178, Rev. 1, 9/03 – An Approach for Plant-Specific Risk-Informed Decisionmaking for Inservice Inspection of Piping

STD COL 1.9-1

Risk-informed inservice inspection is not being utilized for this plant.

Regulatory Guide 1.179, Rev. 0, 1/99 – Standard Format and Content of License Termination Plans for Nuclear Power Reactors

N/A This Regulatory Guide is outside the scope of the FSAR.

Regulatory Guide 1.180, Rev. 1, 10/03 – Guidelines for Evaluating Electromagnetic and Radio-Frequency Interference in Safety-Related Instrumentation and Control Systems

Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
General		Conforms	Exclusion zones are established through administrative controls to prohibit the activation of portable EMI/RFI emitters (e.g., welders and transceivers) in areas where safety-related I&C systems are installed.
	Regulatory Guide 1.181, Rev. 0, 9/99 – Content of the Updated Final Safety Analysis Report in Accordance with 10 CFR 50.71(e)		
General		Conforms	
	Regulatory Guide 1.182, Rev. 0, 5/00 – Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants		
General		Conforms	
	Regulatory Guide 1.184, Rev. 0, 7/00 – Decommissioning of Nuclear Power Reactors		
		N/A	This Regulatory Guide is outside the scope of the FSAR.
	Regulatory Guide 1.185, Rev. 0, 7/00 – Standard Format and Content for Post-shutdown Decommissioning Activities Report		
		N/A	This Regulatory Guide is outside the scope of the FSAR.
STD COL 1.9-1	Regulatory Guide 1.186, Rev. 0, 12/00 – Guidance and Examples for Identifying 10 CFR 50.2 Design Bases		
		N/A	This Regulatory Guide is outside the scope of the FSAR.
	Regulatory Guide 1.187, Rev. 0, 11/00 – Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments		
General		Conforms	
	Regulatory Guide 1.188, Rev. 1, 9/05 – Standard Format and Content for Applications To Renew Nuclear Power Plant Operating Licenses		
		N/A	This Regulatory Guide is outside the scope of the FSAR.

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Regulatory Guide 1.189, Rev. 1, 3/07 – Fire Protection for Nuclear Power Plants

Conformance with Revision 0 of the Regulatory Guide is documented in the DCD. Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General Conforms

Regulatory Guide 1.191, Rev. 0, 5/01 – Fire Protection Program for Nuclear Power Plants During Decommissioning and Permanent Shutdown

N/A This Regulatory Guide is outside the scope of the FSAR.

Regulatory Guide 1.192, Rev. 0, 6/03 – Operation and Maintenance Code Case Acceptability, ASME OM Code

General Conforms

LNP COL 1.9-1 **Regulatory Guide 1.193, Rev. 2, 10/07 – ASME Code Cases Not Approved for Use**

General Conforms

STD COL 1.9-1 **Regulatory Guide 1.194, Rev. 0, 6/03 – Atmospheric Relative Concentrations for Control Room Radiological Habitability Assessments at Nuclear Power Plants**

General Conforms

Regulatory Guide 1.195, Rev. 0, 5/03 – Methods and Assumptions for Evaluating Radiological Consequences of Design Basis Accidents at Light-Water Nuclear Power Reactors

This Regulatory Guide is not applicable to the AP1000 certified design.

Regulatory Guide 1.196, Rev. 1, 1/07 – Control Room Habitability at Light-Water Nuclear Power Reactors

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below. This Regulatory Guide is not applicable to the AP1000 certified design.

General Conforms

Regulatory Guide 1.197, Rev. 0, 5/03 – Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors

Conformance with the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.

General Conforms

Regulatory Guide 1.198, Rev. 0, 11/03 – Procedures and Criteria for Assessing Seismic Soil Liquefaction at Nuclear Power Plant Sites

General Conforms

Regulatory Guide 1.199, Rev. 0, 11/03 – Anchoring Components and Structural Supports in Concrete

Conformance with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

Regulatory Guide 1.200, Rev. 1, 1/07 – An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities

General Conforms

STD COL 1.9-1

Regulatory Guide 1.201, Rev. 1, 5/06 – Guidelines for Categorizing Structures, Systems, and Components in Nuclear Power Plants According to Their Safety Significance

This Regulatory Guide is not applicable to the AP1000 certified design.

Regulatory Guide 1.202, Rev. 0, 2/05 – Standard Format and Content of Decommissioning Cost Estimates for Nuclear Power Reactors

This Regulatory Guide is outside the scope of the FSAR.

Regulatory Guide 1.203, Rev. 0, 12/05 – Transient and Accident Analysis Methods

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This Regulatory Guide is not applicable to the AP1000 certified design.

Regulatory Guide 1.204, Rev. 0, 11/05 – Guidelines for Lightning Protection of Nuclear Power Plants

General Conforms

Regulatory Guide 1.205, Rev. 0, 5/06 – Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants

This Regulatory Guide is not applicable to the AP1000 certified design.

Regulatory Guide 1.206, Rev. 0, 6/07 – Combined License Applications for Nuclear Power Plants (LWR Edition)

General Format Conforms

General Content Exception Exceptions to content are identified in [Table 1.9-202](#).

Regulatory Guide 1.207, Rev. 0, 3/07 – Guidelines for Evaluating Fatigue Analyses Incorporating the Life Reduction of Metal Components Due to the Effects of the Light-Water Reactor Environment for New Reactors

This Regulatory Guide is not applicable to the AP1000 certified design.

Regulatory Guide 1.208, Rev. 0, 3/07 – A Performance-Based Approach to Define the Site-Specific Earthquake Ground Motion

General Conforms

STD COL 1.9-1	Appendix C, Section C.3	Exception 3.4	Exception is taken to requirement that 0.05 and 0.95 fractile hazard curves be provided. These were not run. Hazard curves were run at 0.15 and 0.85th percentile instead of 0.16 and 84th as they are very close approximations (+/- 1 sigma).
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Regulatory Guide 1.209, Rev. 0, 3/07 – Guidelines for Environmental Qualification of Safety-Related Computer-Based Instrumentation and Control Systems in Nuclear Power Plants

This Regulatory Guide is not applicable to the AP1000 certified design.

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
LNP COL 1.9-1	Regulatory Guide 1.221, Rev. 0, 10/11 - Design-Basis Hurricane and Hurricane Missiles for Nuclear Power Plants		
	General	Conforms	
STD COL 1.9-1	DIVISION 4 – Environmental and Siting		
	Regulatory Guide 4.7 Rev. 2, 4/98 – General Site Suitability Criteria for Nuclear Power Stations		
	General	Conforms	
	Regulatory Guide 4.15 Rev. 2, 7/07 – Quality Assurance for Radiological Monitoring Programs (Inception through Normal Operations to License Termination) – Effluent Streams and the Environment		
		Exception	The Guidance of Rev. 1, February 1979 will be followed as per the justification provided in FSAR Subsection 11.5.3.
	DIVISION 5 – Materials and Plant Protection		
	The plant-specific physical security plans include no substantive deviations from the NRC-endorsed template in NEI 03-12, Rev. 6. Therefore, the degree of conformance with Division 5 regulatory guides for the Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan is consistent with the degree of conformance of NEI 03-12, Rev. 6.		
STD COL 1.9-1	Regulatory Guide 5.9 Rev. 2, 12/83 – Guidelines for Germanium Spectroscopy Systems for Measurement of Special Nuclear Material		
		N/A	This Regulatory Guide is outside the scope of the FSAR.
	Regulatory Guide 5.12, Rev. 0, 11/73 – General Use of Locks in the Protection and Control of Facilities and Special Nuclear Materials		
	Conformance of the design aspects is as stated in the DCD.		
		N/A	This Regulatory Guide is outside the scope of the FSAR.

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Regulatory Guide 5.65, Rev. 0, 9/86 – Vital Area Access Controls, Protection of Physical Security Equipment, and Key and Lock Controls

Conformance of the design aspects is as stated in the DCD.

N/A	This Regulatory Guide is outside the scope of the FSAR.
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Regulatory Guide 5.71, Rev. 0, 1/10 – Cyber Security Programs for Nuclear Facilities

Conformance with regulatory positions C.1 through C.5 of Regulatory Guide 5.71, Rev. 0, is as stated in the Cyber Security Plan (CSP), with exceptions to the guidance as noted in Attachment A of the CSP.

DIVISION 8 – Occupational Health

Regulatory Guide 8.2, Rev. 0, 2/73 – Guide for Administrative Practices in Radiation Monitoring

General	10 CFR Part 20; ANSI 13.2-1969	Exception	The reference to 10 CFR 20.401 is no longer valid in the current version of 10 CFR Part 20.
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ANSI N13.2-1969 was reaffirmed in 1988.

Regulatory Guide 8.4, Rev. 0, 2/73 - Direct-Reading and Indirect-Reading Pocket Dosimeters

General	10 CFR Part 20	Exception	The reference to 10 CFR 20.202 (a) and 20.401 is no longer valid in the current version of 10 CFR Part 20.
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	ANSI N13.5-1972		ANSI N13.5-1972 was reaffirmed in 1989.
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The two performance criteria specified in Regulatory Guide 8.4 (accuracy and leakage) for these devices are met using acceptance standards in ANSI N322-1997 "American National Standard Inspection, Test, Construction, and Performance Requirements for Direct Reading

STD COL 1.9-1

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
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Electrostatic/Electroscope Type Dosimeters".

Regulatory Guide 8.5, Rev. 1, 3/81 - Criticality and Other Interior Evacuation Signals

General Conforms

Regulatory Guide 8.6, Rev. 0, 5/73 - Standard Test Procedure for Geiger-Muller Counters

General Exception Instrument calibration program is based upon criteria in ANSI N323A-1997 (with 2004 Correction Sheet) "Radiation Protection Instrumentation Test and Calibration, Portable Survey Instruments." The ANSI 42.3-1969 Standard is no longer recognized as sufficient for calibration of modern instruments.

Regulatory Guide 8.7, Rev. 2, 11/05 - Instructions for Recording and Reporting Occupational Radiation Dose Data

General Conforms

Regulatory Guide 8.8, Rev. 3, 6/78 – Information Relevant to Ensuring That Occupational Radiation Exposures at Nuclear Power Stations Will Be As Low As Is Reasonably Achievable

STD COL 1.9-1 Conformance of the design aspects is as stated in the DCD. Conformance with Revision 3 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

C.1 Conforms

C.3.a Conforms

C.3.b Exception Regulatory Guide 1.16 C.1.b.(3) data is no longer reported. Reporting per C.1.b(2) is also no longer required.

C.3.c Conforms

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
C.4.b- C.4.d	ANSI Z-88.2, Regulatory Guide 8.15, NUREG-0041	Conforms	Conformance is with the latest revision of NUREG-0041.

Regulatory Guide 8.9, Rev. 1, 7/93 – Acceptable Concepts, Models, Equations, and Assumptions for a Bioassay Program

General Conforms

Regulatory Guide 8.10, Rev. 1-R, 5/77 – Operating Philosophy For Maintaining Occupational Radiation Exposures as Low as is Reasonably Achievable

General Conforms

Regulatory Guide 8.13, Rev. 3, 6/99 – Instruction Concerning Prenatal Radiation Exposure

General Conforms

Regulatory Guide 8.15, Rev. 1, 10/99 – Acceptable Programs for Respiratory Protection

General Conforms

Regulatory Guide 8.27, Rev. 0, 3/81 – Radiation Protection Training for Personnel at Light-Water-Cooled Nuclear Power Plants

General Conforms

Regulatory Guide 8.28, Rev. 0, 8/81 – Audible-Alarm Dosimeters

STD COL 1.9-1

General ANSI
N13.27-1981 Conforms

Regulatory Guide 8.29, Rev. 1, 2/96 – Instruction Concerning Risks from Occupational Radiation Exposure

General Conforms

Regulatory Guide 8.34, Rev. 0, 7/92 – Monitoring Criteria and Methods To Calculate Occupational Radiation Doses

General Conforms

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Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
Regulatory Guide 8.35, Rev. 0, 6/92 – Planned Special Exposures			
General		Conforms	
Regulatory Guide 8.36, Rev. 0, 7/92 – Radiation Dose to the Embryo/Fetus			
General		Conforms	
Regulatory Guide 8.38, Rev. 1, 5/06 – Control of Access to High and Very High Radiation Areas in Nuclear Power Plants			
Conformance of the design aspects is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.			
General		Conforms	

Note a. Above stated general alternatives regarding the use of previous revisions of the Regulatory Guide for design aspects as stated in the DCD is provided to preserve the finality of the certified design. Further, each stated conformance with the programmatic and/or operational aspects is only to the extent that a design change or departure from the approved DCD is not required to implement those programmatic and/or operational aspects. As the operational and programmatic aspects become more fully defined (for example, during preparation, approval, or initial implementation of plant procedures), there exists a potential that a conflict could be identified between the design as certified in the DCD and the programmatic and/or operational aspects of the guidance. In such cases, the design certification (rule) becomes the controlling factor, and the design conformance to the Regulatory Guide is per the revision stated in the DCD.

Note b. A “Criteria Section” entry of “General” indicates a scope for the conformance statement of “all regulatory guide positions related to programmatic and/or operational aspects.” Thus, an associated conformance statement of “Conforms” indicates that the applicant “complies with all regulatory guide positions related to programmatic and/or operational aspects.”