

## **NRR-PMDAPem Resource**

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**From:** Van Der Kamp, David W. <dwvande@nppd.com>  
**Sent:** Monday, June 06, 2016 2:03 PM  
**To:** Wang, Alan  
**Cc:** Shaw, Jim D.; Olberding, Jodie Y.  
**Subject:** [External\_Sender] RE: RE: 1967 Proposed GDC vs 1971 GDC 26 and 27.docx

Alan, reactor engineering has reviewed the GDC comparison chart that you provided and concur with the equivalencies that are cross-referenced. Based on the July 4, 2012 letter from the TSTF to the NRC, I am providing you the following concurrence and conclusion.

"The Traveler and model Safety Evaluation discuss the applicable regulatory requirements and guidance, including the 10 CFR 50, Appendix A, General Design Criteria (GDC). Cooper Nuclear Station (CNS) was not licensed to the 10 CFR 50, Appendix A, GDC. The CNS equivalent of the referenced GDCs are located in the Updated Safety Analysis Report, Appendix F. The pre-GDC equivalent of GDC 26 are Criterion 27, 28, 29, and 30. The pre-GDC equivalent of GDC 27 is Criterion 29. A review has determined that the plant-specific requirements are sufficiently similar to the Appendix A GDC as related to the proposed change. In addition, the AEC conducted their technical review of the CNS design against the 1971 GDC, and concluded that the CNS design conforms to the intent of the 1971 GDCs. This difference does not alter the conclusion that the proposed change is applicable to CNS."

Please let me know if there is anything else that is needed.

David Van Der Kamp  
Licensing Technical Specialist  
Cooper Nuclear Station

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**From:** Wang, Alan [mailto:Alan.Wang@nrc.gov]  
**Sent:** Friday, June 03, 2016 8:36 AM  
**To:** Van Der Kamp, David W.  
**Subject:** RE: RE: 1967 Proposed GDC vs 1971 GDC 26 and 27.docx

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Dave, I do not think I sent you the entire letter regarding pre-GDC plants. I thought this might help you in your discussions with the Reactor Engineering.

1. Future Travelers will continue to discuss the 10 CFR 50 Appendix A GDC, as needed.
2. Future Traveler model applications for Travelers that discuss the GDC will instruct licensees that are not licensed to the 10 CFR 50, Appendix A GDC to discuss in the LAR their plant specific licensing basis that is equivalent to the GDC referenced in the Traveler. For example, the model application will contain text similar to the following:

"The Traveler and model Safety Evaluation discuss the applicable regulatory requirements and guidance, including the 10 CFR 50, Appendix A, General Design Criteria (GDC). [PLANT] was not licensed to the 10 CFR 50, Appendix A, GDC. The

[PLANT] equivalent of the referenced GDC are [REFERENCE INCLUDING UFSAR LOCATION, IF APPLICABLE]. [DISCUSS THE EQUIVALENCE OF THE REFERENCED PLANT-SPECIFIC REQUIREMENTS TO THE APPENDIX A GDC AS RELATED TO THE PROPOSED CHANGE.] This difference does not alter the conclusion that the proposed change is applicable to [PLANT]."

3. In future model SEs, the NRC should provide guidance to reviewers to utilize the discussion of the 10 CFR 50, Appendix A GDC in the model SE or the licensee-provided discussion of plant-specific requirements, as applicable.

4. The TSTF will recommend that licensees adopting previously-approved Travelers do the following:

- a. If the Traveler or model SE reference the 10 CFR 50, Appendix A GDC and that is consistent with the plant's licensing basis, the model application should be used as written.
- b. If the Traveler or model SE reference the 10 CFR 50, Appendix A GDC and that is not consistent with the plant's licensing basis, a discussion similar to the example in Item 2 should be included in the model application, Section 2.1, "Applicability of the Published Safety Evaluation." We do not expect that this variation will result in a Traveler being removed from Consolidated Line Item Improvement Process (CLIIP), if applicable.

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**From:** Van Der Kamp, David W. [<mailto:dvwande@nppd.com>]  
**Sent:** Thursday, June 02, 2016 7:07 AM  
**To:** Wang, Alan <[Alan.Wang@nrc.gov](mailto:Alan.Wang@nrc.gov)>  
**Subject:** [External\_Sender] RE: 1967 Proposed GDC vs 1971 GDC 26 and 27.docx

The Reactor Engineers are not available until Monday, so it will be a few days before I can get the response back to you. I was planning on using the pre-GDC paragraph that was added in the second SE if that works for you.. I'll fill in the plant specific information in the bracketed sections.

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**From:** Wang, Alan [<mailto:Alan.Wang@nrc.gov>]  
**Sent:** Wednesday, June 01, 2016 11:56 AM  
**To:** Van Der Kamp, David W.  
**Subject:** RE: 1967 Proposed GDC vs 1971 GDC 26 and 27.docx

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Dave, from the TSTF-535 lead reviewer:

You initially mentioned having found 2 SEs, one of which discussed GDC 26 only, and the other that discussed GDC 26 and 27. If the SE you found has an ML# of ML112200436, that was the original TSTF-535 Submittal that we were requested to review. It only discusses GDC 26. Admittedly, GDC 26 is the *primary* GDC with which we need to be concerned, but the Tech staff felt that GDC 27 was tangentially related since it concerns itself with maintaining appropriate margin in the event there is a stuck rod. A bounding margin can be determined if one assesses the potential reactivity of the core under the conditions specified during BOL at 68F. This is why we see GDC 27 discussed in the Staff's model SE for TSTF-535 as found in ML12355A772.

Alan

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**From:** Van Der Kamp, David W. [<mailto:dvwande@nppd.com>]  
**Sent:** Thursday, May 26, 2016 10:31 AM  
**To:** Wang, Alan <[Alan.Wang@nrc.gov](mailto:Alan.Wang@nrc.gov)>  
**Cc:** Shaw, Jim D. <[jdshaw@nppd.com](mailto:jdshaw@nppd.com)>; Olberding, Jodie Y. <[jyolber@nppd.com](mailto:jyolber@nppd.com)>  
**Subject:** [External\_Sender] 1967 Proposed GDC vs 1971 GDC 26 and 27.docx

Alan, attached is a Word document that lays out the equivalent proposed GDCs vs the 1971 final GDCs 26 and 27. I question why the SE would include GDC 27 when the TSTF does not reference it.

David Van Der Kamp  
Licensing Technical Specialist  
Cooper Nuclear Station

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Tracking Status: None  
"Wang, Alan" <Alan.Wang@nrc.gov>  
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