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## RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

### APR1400 Design Certification

Korea Electric Power Corporation / Korea Hydro & Nuclear Power Co., LTD

Docket No. 52-046

RAI No.: 509-8591  
SRP Section: 16 - Technical Specifications  
Application Section: TS Section 3.6  
Date of RAI Issue: 08/01/2016

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### **Question No. 16-211**

Paragraph (a)(11) of 10 CFR 52.47 states that a design certification (DC) applicant is to propose Technical Specifications (TS) prepared in accordance with 10 CFR 50.36 and 50.36a. NUREG-1432, "Standard Technical Specifications (STS)-Combustion Engineering Plants," Rev. 4, provides NRC guidance on format and content of technical specifications as one acceptable means to meet 10 CFR 50.36 requirements. Staff needs to evaluate all technical differences from standard TS (STS) NUREG-1432, STS Combustion Engineering Plants, Rev. 4, which is referenced by the DC applicant in DCD Tier 2 Section 16.1, and the docketed rationale for each difference because conformance to STS provisions is used in the safety review as the initial point of guidance for evaluating the adequacy of the generic TS to ensure adequate protection of public health and safety, and the completeness and accuracy of the generic TS Bases.

The Writer's Guide for Plant-Specific Improved Technical Specifications (TSTF-GG-05-01) also provides guidance for the format and content of the TS. There are format and content differences between the DCD and the Writer's Guide. These following corrections are necessary to ensure the completeness and accuracy of the TS and Bases.

The applicant is requested to correct the following editorial errors within Technical Specification (TS) 3.6.3:

- On page 3.6.3-1, the Logical Connector "AND" is not formatted correctly. It should appear flush left directly below the text in Required Action A.1, separated by a line break.
- On page 3.6.3-2, insert a line break between the bottom single line of the NOTE and the text of Required Action A.2. Ensure the corresponding text in the Completion Time column is lowered to align with the text in the Required Action column.

- On page 3.6.3-3, insert a line break between the bottom single line of the NOTE and the text of Required Action D.2. Ensure the corresponding text in the Completion Time column is lowered to align with the text in the Required Action column.

These corrections are required to ensure the correct formatting in the TS.

### **Response**

The editorial items described for Technical Specification S 3.6.3 will be replaced as indicated in Attachment.

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### **Impact on DCD**

Same as changes described in the Impact on Technical Specifications section.

### **Impact on PRA**

There is no impact on the PRA.

### **Impact on Technical Specifications**

Technical Specification Subsection 3.6.3, pages 3.6.3-1, 3.6.3-2 and 3.6.3-3, will be revised as indicated in Attachment.

### **Impact on Technical/Topical/Environmental Reports**

There is no impact on any Technical, Topical, or Environmental Report.

3.6 CONTAINMENT SYSTEMS

3.6.3 Containment Isolation Valves

LCO 3.6.3 Each containment isolation valve shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

NOTE

1. Penetration flow paths (except for 1219.2 mm (48 in) purge valve penetration flow paths) may be unisolated intermittently under administrative controls.
2. Separate Condition entry is allowed for each penetration flow path.
3. Enter applicable Conditions and Required Actions for system(s) made inoperable by containment isolation valves.
4. Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when leakage results in exceeding the overall containment leakage rate acceptance criteria.

| CONDITION  | REQUIRED ACTION  | COMPLETION TIME |
|--|--|-----------------|
| <p>A. ----- NOTE -----<br/>Only applicable to penetration flow paths with two or more containment isolation valves.</p> <hr/> <p>One or more penetration flow paths with one containment isolation valve inoperable (except for purge valve leakage not within limit).</p> | <p>A.1 Isolate affected penetration flow path by use of at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.</p> <p>AND</p> | <p>4 hours</p>  |

ACTIONS (continued)

| CONDITION   | REQUIRED ACTION   | COMPLETION TIME   |
|---|---|---|
| <p>A. (continued)</p> <div data-bbox="407 667 545 741" style="border: 1px solid red; padding: 2px; display: inline-block; margin-left: 100px;">                     Insert a<br/>linebreak                 </div>   | <p>A.2 ----- NOTE -----</p> <ol style="list-style-type: none"> <li>1. Isolation devices in high radiation areas may be verified by use of administrative means.</li> <li>2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means.</li> </ol> <hr style="border: 0.5px solid black;"/> <p>Verify affected penetration flow path is isolated.</p> | <p>Once per 31 days for isolation device outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation device inside containment</p> |
| <p>B. ----- NOTE -----</p> <p>Only applicable to those penetration flow paths with two or more containment isolation valves.</p> <hr style="border: 0.5px solid black;"/> <p>One or more penetration flow paths with two containment isolation valves inoperable (except for purge valve leakage not within limit).</p> | <p>B.1 Isolate affected penetration flow path by use of at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.</p>   | <p>1 hour</p>   |

