

June 30, 2017

Docket No. 52-048

U.S. Nuclear Regulatory Commission  
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Rockville, MD 20852-2738

**SUBJECT:** NuScale Power, LLC Supplemental Response to NRC Request for Additional Information No. 01 (eRAI No. 8738) on the NuScale Design Certification Application

**REFERENCE:** U.S. Nuclear Regulatory Commission, "Request for Additional Information No. 01 (eRAI No. 8738)," dated April 11, 2017

The purpose of this letter is to provide the NuScale Power, LLC (NuScale) supplemental response to the referenced NRC Request for Additional Information (RAI).

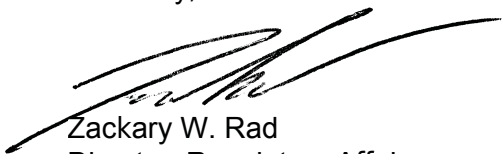
The Enclosure to this letter contains NuScale's supplemental response to the following RAI Question from NRC eRAI No. 8738:

- 13.05.02.01-1

This letter and the enclosed response make no new regulatory commitments and no revisions to any existing regulatory commitments.

If you have any questions on this response, please contact Steven Mirsky at 240-833-3001 or at [smirsky@nuscalepower.com](mailto:smirsky@nuscalepower.com).

Sincerely,



Zackary W. Rad  
Director, Regulatory Affairs  
NuScale Power, LLC

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Enclosure 1: NuScale Supplemental Response to NRC Request for Additional Information eRAI No. 8738

**Enclosure 1:**

NuScale Supplemental Response to NRC Request for Additional Information eRAI No. 8738

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## Supplemental Response to Request for Additional Information Docket No. 52-048

**eRAI No.:** 8738

**Date of RAI Issue:**

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**NRC Question No.:** 13.05.02.01-1

### REGULATORY BASIS REQUIREMENTS

TMI Action Plan Item I.C.1, a Post-TMI requirement approved by the Commission for implementation, requires the preparation of emergency procedure technical guidelines for development of the Emergency Operating Procedures (EOPs). Preparation of the technical guidelines is conducted in accordance with NUREG-0737, "Clarification of TMI Action Plan Requirements," and NUREG-0737, Supplement 1, "Requirements for Emergency Response Capability," which also specify submittal of the technical guidelines to the NRC for review and approval.

Meeting the requirements of TMI Action Plan Item I.C.1 as prescribed in NUREG-0737, Section I.C.1, and Supplement 1 to NUREG-0737, Section 7, is acceptance criteria in SRP 13.5.2.1, "Operating and Emergency Operating Procedures." Design-specific Generic Technical Guidelines (GTGs), otherwise referred to as the Emergency Operating Guidelines (EOGs), will be used by COL applicants to develop their Plant-Specific Technical Guidelines (P-STGs), from which their EOPs will be developed, and are the responsibility of the DC applicant.

The P-STGs may be based on either of the following GTG options:

- a. ***NuScale design-specific GTGs, the development of which has no basis in any of the previously reviewed and approved owners group GTGs.*** NuScale would provide the supporting analyses used in the developmental process (e.g., best estimate analyses for the operational transients and accidents that were used for the NuScale GTGs; analyses that identify operator tasks, and information and control needs; engineering evaluations; etc.).
- b. ***NuScale design-specific GTGs that are derived from one of the previously reviewed and approved owners group GTGs (i.e., Westinghouse, Combustion Engineering, Babcock and Wilcox, General Electric).*** NuScale would identify significant safety deviations from the approved owner's group GTGs (including identification of additional equipment beyond that identified in the GTGs), and provide the supporting analyses (e.g., best estimate analyses for the operational transients and



accidents that were used for the NuScale GTGs; analyses that identify operator tasks, and information and control needs; engineering evaluations; etc.) necessary to technically justify the adequacy of each deviation.

## **ISSUE**

NuScale DCD Section 13.5 does not include NuScale design-specific GTGs.

## **INFORMATION NEEDED**

Provide NuScale design-specific GTGs prepared in accordance with the prescribed guidance in NUREG-0737, Section I.C.1, and Supplement 1 to NUREG-0737, Section 7, along with the necessary supporting analyses.

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## **NuScale Response:**

This response supplements and revises the original RAI 13.05.02.01-1 (eRAI No. 8738) response as a result of telephone conversations with the NRC on June 20 and June 26, 2017. In lieu of making its NuScale Generic Technical Guidelines (GTG) document available on the NuScale electronic reading room, NuScale will submit its GTG document, Technical Report RP-0417-53663, on the docket by November 30, 2017.

## **Impact on DCA:**

There are no impacts to the DCA as a result of this response.