

HCVS FIP Template – 07/26/2017 Draft Comment Resolution Table

#	FIP Section	NRC Staff Comment	Industry Resolution
LB1	Section I.A.1: Summary of Phase 1 Compliance:	Include an author’s note: State clearly whether this is the flow path that is being/has been reviewed for EA-12-049, or whether the SAWA/SAWM use a different or modified flow path.	A red text instructional note has been added to indicate that it should be clearly stated if the SAWA flow path is the same as that assumed and reviewed for EA-12-049 or to explain the differences in the SAWA flow path. If different, point to the calculation or analysis that determined the changes are acceptable. Related green text has been added for the pilot plant to provide an example of statement to be made.
LB2		Similar here – need to point out whether these loads were included in FLEX electrical analyses. Add comment similar to above.	A red text instructional note has been added to indicate that it should be clearly stated if the SAWA electrical loads are the same as that assumed and reviewed for EA-12-049 or to explain the differences in the FLEX loading calculation. If different, point to the calculation or analysis that determined the changes are acceptable. Related green text has been added for the pilot plant to provide an example of statement to be made.
LB3	Section II: List of Acronyms	Please confirm that all acronyms used throughout the document are listed here. (ex. ERO, SA, SAWA, SAWM, etc.)	A final review of the FIP template will be done to confirm that all acronyms used in the document are listed and defined in this section.
LB4	Section III.A: HCVS Phase 1 Compliance Overview	Is there any input going to be included for these sections. If not, consider reformatting.	A brief overview discussion of HCVS Phase 1 has been added to this section.
LB5	Section III.B.2: EA- 13-109 Hardened Containment Vent System (HCVS)	Add a statement that points to the I&C table (Table 1), such as “Table 1 contains a complete list of sensors, transmitters, and displays available at the MCR, ROS, and equipment locations.”	A reference to Table 1 has been added in this section.
Comments LB6 through LB9 Apply to Section III.C: HCVS Phase 1 Evaluation Against Requirements			
LB6	1.1.1	Please include an author note that captures the disconnect, if any, between existing SAMGs guidance	A note has been added to capture any differences between existing EOP and SAMG guidance for the

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		or site-specific guidance for lifting leads and/or installing jumpers for interlocks and those actions exclusive for HCVS operator actions.	installation of lifted leads and/or installed jumpers for interlocks and those actions exclusive for HCVS operator actions. This is a red text instructional note since it will be site specific information and is not required for the Brunswick HCVS.
LB7	1.1.2	Recommend note: “This is rarely if ever credited for EA-12-049 for MCR temperature control. This should be plant-specific (green text). This also may result in FLEX DG loads beyond those that were evaluated for FLEX. Include an authors’ note as follows: “Specify whether these were included in the FLEX DG loading analyses and room heatup analyses, and update relevant sections to discuss the additional loads, as necessary.”	This has been made green text. A red text instructional note has been added to indicate that it should be clearly stated if the SAWA electrical loads are the same as that assumed and reviewed for EA-12-049 or to explain the differences in the FLEX loading calculation. If different, point to the calculation or analysis that determined the changes are acceptable. Related green text has been added for the pilot plant to provide an example of statement to be made.
Edit	1.1.3	Delete text “per GDC 19 in 10CFR50 Appendix A”	Deleted
Edit	1.1.4	Delete text “per GDC 19 in 10CFR50 Appendix A”	Deleted
LB8	1.2.1	Add author note that points to the analyses, which closes out the related open item.	A red text instructional note has been added to point to the analysis that closes out the associated open item.
LB9	1.2.10	The assumption here is that they have been shown to perform their function under the postulated conditions. Should probably say that. Industry: Updated (8/9) Staff edits	Change accepted as indicated. HCVS piping and components have been analyzed and shown to perform under severe accident conditions using the guidance provided in HCVS-FAQ-08 and HCVS-WP-02.
LB10	Section IV.C: HCVS Phase 2 SAWA	Edited to clarify that we’re not talking about airborne or plume.	Change accepted as indicated. These radiological impacts, including dose from containment and HCVS vent line shine are evaluated....
LB11	System and SAWM Strategy	Guidance vs. requirement?	Changed the term requirement to guidance.
LB12	Section IV.C.1:	Include an author’s note: State clearly whether this is the flow path that is being/has been reviewed for EA-	A red text instructional note has been added to indicate that it should be clearly stated if the flow

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	Detailed SAWA Flow Path Description	12-049, or whether the SAWA/SAWM use a different or modified flow path.	path is the same as that reviewed for EA-120049 or to define the differences in the modified flow path. Related green text has been added for the pilot plant to provide an example of statement to be made.
LB13	Section IV.C.2: Severe Accident Assessment of Flow Path	Add author note to verify that the deployment time for the FLEX pump for HCVS is enveloped for the deployment time for FLEX.	A red text instructional note has been added to indicate that it should be clearly stated if the FLEX (SAWA) pump deployment time is enveloped by the deployment time for FLEX or to explain the differences in expected deployment time. Related green text has been added for the pilot plant to provide an example of statement to be made.
LB14	Section IV.C.7: Strategy time line	Make green for plant-specific.	"100" has been changed to green text.
15	Section IV.C.9.2: Describe SAWA instruments and guidance	Include an author's note: State clearly whether the instruments were included in the analysis that is being/has been reviewed for EA-12-049, or whether the instruments additional loads.	A red text instructional note has been added to indicate that it should be clearly stated if the SAWA instrument loads are the same as that assumed and reviewed for EA-12-049 or to explain the differences in the FLEX loading calculation. Related green text has been added for the pilot plant to provide an example of statement to be made.
16	Section V.B: HCVS Training Requirements	Edit - Systematic	<p>From 10 CFR 55.4: Systems Approach to Training means a training program that includes the following five elements: (1) Systematic analysis of the jobs to be performed.</p> <p><u>Changed from:</u> The personnel trained and the frequency of training was determined using the Systems Approach to Training (SAT)</p> <p><u>To:</u> The personnel trained and the frequency of training was determined using a systematic analysis</p>

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			of the tasks to be performed using the Systems Approach to Training (SAT) process.
17	Table 1	Table doesn't appear to include all sub-components of channels (i.e. detector, transmitter, monitor)	Table 1 has been revised to include appropriate instrument loop components (e.g., detector, transmitter, monitor)