



June 07, 2018

Docket No. 52-048

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

**SUBJECT:** NuScale Power, LLC Supplemental Response to NRC Request for Additional Information No. 197 (eRAI No. 9051) on the NuScale Design Certification Application

**REFERENCES:** 1. U.S. Nuclear Regulatory Commission, "Request for Additional Information No. 197 (eRAI No. 9051)," dated August 25, 2017  
2. NuScale Power, LLC Response to NRC "Request for Additional Information No. 197 (eRAI No.9051)," dated October 18, 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. 9051:

- 16-27

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,

A handwritten signature in black ink, appearing to read "Zackary W. Rad".

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

Distribution: Gregory Cranston, NRC, OWFN-8G9A  
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Enclosure 1: NuScale Supplemental Response to NRC Request for Additional Information eRAI No. 9051



RAIO-0618-60347

**Enclosure 1:**

NuScale Supplemental Response to NRC Request for Additional Information eRAI No. 9051

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

**eRAI No.:** 9051

**Date of RAI Issue:** 08/25/2017

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### **NRC Question No.:** 16-27

Paragraph (a)(11) of 10 CFR 52.47 and paragraph (a)(30) of 10 CFR 52.79 state that a design certification (DC) applicant and a combined license (COL) applicant, respectively, are to propose technical specifications (TS) prepared in accordance with 10 CFR 50.36 and 50.36a. 10 CFR 50.36 sets forth requirements for TS to be included as part of the operating license for a nuclear power facility. The model standard technical specifications (STS) in the following documents provide NRC guidance on format and content of TS as acceptable means to meet 10 CFR 50.36 requirements. These documents may be accessed using the Agencywide Documents Access and Management Systems (ADAMS) by their accession numbers.

- NUREG-1431, “STS Westinghouse Plants,” Revision 4 (ADAMS Accession Nos. ML12100A222 and ML12100A228)
- NUREG-1432, “STS Combustion Engineering Plants,” Revision 4 (ADAMS Accession Nos. ML12102A165 and ML12102A169)
- NUREG-2194, “STS Westinghouse Advanced Passive 1000 (AP1000) Plants,” Revision 0 (ADAMS Accession No. ML16111A132)

The NRC staff needs to evaluate technical differences in the proposed generic TS (GTS) from applicable provisions in these documents, which are referenced by the DC applicant in Design Control Document (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 GTS to ensure adequate protection of public health and safety, and the completeness and accuracy of the GTS Bases.

The staff reviewed the applicant’s evaluation of the NuScale design and safety analyses against the four LCO selection criteria of 10 CFR 50.36(c)(2)(ii) as documented in the Technical Specifications Regulatory Conformance and Development (TSRCD), TR-1116-52011-NP, dated December 16, 2016 (ADAMS Accession No. ML17005A136). For NuScale SSCs determined to meet none of the criteria, the applicant is requested to augment that report by stating how the availability and testing of such SSCs are intended to be controlled by a NuScale Nuclear Power

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Plant COL holder. The response should cite the regulatory basis for the controls.

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**NuScale Response:**

During a public teleconference on February 21, 2018 the NRC staff clarified that the issue of concern was with the administrative controls applicable to the availability and reliability controls over non-Technical Specification requirements for structures, systems, components, and functions that were identified in the owner-controlled requirements manual previously referred to in various RAI responses.

NuScale indicated that the procedures used to implement the availability and reliability controls applicable scope would be added to Technical Specification 5.4, "Procedures." The staff also identified a discrepancy between FSAR Chapter 13, "Conduct of Operations," and the technical specifications identifying the applicable version of Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)." NuScale stated that Technical Specifications 5.4 would be modified to refer to Regulatory Guide 1.33 Revision 3, June 2013 consistent with the FSAR.

**Impact on DCA:**

The Technical Specifications have been revised as described in the response above and as shown in the markup provided in this response.

## 5.0 ADMINISTRATIVE CONTROLS

### 5.4 Procedures

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5.4.1 Written procedures shall be established, implemented, and maintained covering the following activities:

- a. The applicable procedures recommended in Regulatory Guide 1.33, Revision ~~32, Appendix A, February 1978~~ June 2013;
  - b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1;
  - c. Quality assurance for effluent and environmental monitoring;
  - d. Fire Protection Program implementation; ~~and~~
  - e. All programs specified in Specification 5.5; ~~and~~.
  - f. Procedures that implement the availability and reliability controls applicable to structures, systems, or components as described in the owner-controlled requirements manual.
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