

D.3 Hardware System Equipment Qualification

D.3.1 Information to be Provided

The NRC staff should verify that the licensee has demonstrated that the system will perform its safety functions under the design-basis conditions at the location in which the equipment will be installed. This information should be ~~found~~ documented in the referenced equipment qualification methodologies, and demonstrate the qualification in the documented analyses, test plans, and test reports. The NRC should verify that the sources for the test or analysis methodologies used are documented (e.g., EPRI TR-107330, RG 1.180 Rev. 1, plant seismic analysis at the installed location, etc.). The NRC should verify that the test or analysis qualification levels and methods used are documented, and any discrepancies where the achieved qualification levels do not envelope the required test or analysis levels are justified. The NRC staff should verify that the licensee has included a summary of documents referencing detailed test reports to support this conclusion (e.g., seismic test reports or analysis, electromagnetic compatibility reports, environmental test reports). For a topical report, the summary should document the methods, levels, and results of the qualification testing. For a LAR, the summary should ~~compare define the standards and test~~ limits to which the equipment has been qualified and should compare the equipment qualification ~~test~~ limits to the licensee-established or standard generic (e.g., EMC) plant environmental conditions. The LAR should describe and justify any discrepancies between equipment qualification test limits and expected plant environmental conditions (or generic limits for a topical report).

PUBLIC SUBMISSION

As of: 8/31/18 11:19 AM Received: August 29, 2018 Status: Pending_Post Tracking No. 1k2-954h-ujr7 Comments Due: September 06, 2018 Submission Type: Web
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Docket: NRC-2018-0139

Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving Proposed No Significant Hazards Considerations and Containing Sensitive Unclassified Non-Safeguards Information and Order Imposing Procedures for Access to Sensitive Unclassified Non-Safeguards Information

Comment On: NRC-2018-0139-0001

Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving Proposed No Significant Hazards Considerations and Containing Sensitive Unclassified Non-Safeguards Information and Order Imposing Procedures for Access to Sensitive Unclassified Non-Safeguards Information

Document: NRC-2018-0139-DRAFT-0001

Comment on FR Doc # 2018-14915

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SUNSI Review Complete
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 E-RIDS=ADM-03
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COMMENT (1)
 PUBLICATION DATE: 8/7/2018
 CITATION 83 FR 38732

General Comment

DI&C ISG-06 Rev. 2 no longer appears to require the definition of the limits and methods used for EQ tests or analyses, including methods and limits, which were defined in DI&C ISG-06 Rev. 1. Section D.3 appears to mix the topical report data evaluation of the initial equipment qualification evaluation against pre-defined limits and methodology, with the comparison of the equipment pre-approved qualification limits to plant requirements in a LAR. With the post-ACRS elimination of duplicate text, and the re-write of this section specifically to checking the EQ against the plant requirements, the document does not reference the requirements to document the EQ bases. The topical report needs to define the source for the methodology to be used and the test/analysis limits, as well as justifying any place the equipment did not meet the test levels. The LAR then provides a reference to the topical report and SE and the comparison between the pre-qualified and pre-approved platforms equipment qualification limits and the required plant conditions. The attached Word file provides recommended additions and edits to consider in red text and strikeout.

Attachments

20180828 One MPR comment on ISG-06