

Limitations and Conditions Related to the Review of
Vogtle Systematic Risk-Informed Assessment of Debris Technical Report

Licensees referencing the methodologies (incl., assumptions and inputs) described in the enclosures attached to SNC's letter dated July 10, 2018 in plant-specific, risk-informed request for licensing action must address the following conditions and limitations.

1. The applicability of the NRC approval is limited to the structures, systems, components, plant configurations, and operations described in Enclosures 2, 3, and 4 of SNC's letter dated July 10, 2018, especially the strainer design described in the Section titled "16-Disk ECCS Suction Strainer Summary" of Enclosure 2.
2. The applicability of the NRC approval is limited to the Vogtle assessment of risk attributable to debris described in Enclosures 1 and 3 of SNC's letter dated July 10, 2018.
3. The licensee must describe in-vessel analysis, establish in-vessel acceptance criteria, and demonstrate the in-vessel acceptance criteria are met.
4. The licensee must address Principles 1 and 5 of RG 1.174, Revision 3.
5. The licensee must identify key elements of the risk-informed analysis (e.g., methods, approaches, and data) that will be described in the Vogtle UFSAR.
6. The licensee must identify key elements of the risk-informed analysis and the corresponding methods, approaches, and data that if changed would constitute a departure from the method used in the safety analysis as defined by 10 CFR 50.59.
7. The licensee should identify the relevant elements of the risk-informed assessment that may need to be periodically updated. The licensee must describe the program or controls that will be used to ensure relevant elements of the risk-informed assessment are periodically updated.
8. The licensee should describe a reporting and corrective action strategy for addressing situations in which an update to the risk-informed assessment reveals that the acceptance guidelines described in Section 2.4 of RG 1.174, Revision 3 have been exceeded.
9. The licensee must provide corrected coating debris volumes, and the licensee must describe how coating debris loads on the strainers are determined. In addition:
 - a. The licensee must verify that the use of the corrected coating debris volumes has a minor impact on strainer headloss and the head loss is acceptable. Also, the licensee must describe the method of verification.
 - b. The licensee must verify that the use of the corrected coating debris volumes has a minor impact on CDF and does not result in exceeding the acceptance guidelines for very small change in risk as described in Section 2.4 of RG 1.174, Revision 3. Also, the licensee must describe the method of verification.