

ATTACHMENT TO LICENSE AMENDMENT NO. 157

TO FACILITY COMBINED LICENSE NO. NPF-91

DOCKET NO. 52-025

Replace the following pages of the Facility Combined License No. NPF-91 with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Facility Combined License No. NPF-91

REMOVE

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INSERT

7

Appendix C to Facility Combined License No. NPF-91

REMOVE

C-33

C-34

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(7) Reporting Requirements

- (a) Within 30 days of a change to the initial test program described in UFSAR Section 14, Initial Test Program, made in accordance with 10 CFR 50.59 or in accordance with 10 CFR Part 52, Appendix D, Section VIII, "Processes for Changes and Departures," SNC shall report the change to the Director of NRO, or the Director's designee, in accordance with 10 CFR 50.59(d).
- (b) SNC shall report any violation of a requirement in Section 2.D.(3), Section 2.D.(4), Section 2.D.(5), and Section 2.D.(6) of this license within 24 hours. Initial notification shall be made to the NRC Operations Center in accordance with 10 CFR 50.72, with written follow up in accordance with 10 CFR 50.73.

(8) Incorporation

The Technical Specifications, Environmental Protection Plan, and ITAAC in Appendices A, B, and C, respectively of this license, as revised through Amendment No. 157, are hereby incorporated into this license.

(9) Technical Specifications

The technical specifications in Appendix A to this license become effective upon a Commission finding that the acceptance criteria in this license (ITAAC) are met in accordance with 10 CFR 52.103(g).

(10) Operational Program Implementation

SNC shall implement the programs or portions of programs identified below, on or before the date SNC achieves the following milestones:

- (a) Environmental Qualification Program implemented before initial fuel load;
- (b) Reactor Vessel Material Surveillance Program implemented before initial criticality;
- (c) Preservice Testing Program implemented before initial fuel load;
- (d) Containment Leakage Rate Testing Program implemented before initial fuel load;
- (e) Fire Protection Program
 - 1. The fire protection measures in accordance with Regulatory Guide (RG) 1.189 for designated storage building areas (including adjacent fire areas that could affect the storage area) implemented before initial receipt

number identified in the ITAACs does not include the type of instrument (for example, the Containment Exhaust Fan A Flow Sensor, VFS-11A, does not include the designators FE [flow element] or FT [flow transmitter], which would appear on the actual hardware or in the associated software). This is because the designator VFS-11A and the equipment description are sufficient to uniquely identify the channel associated with the designated instrument function, and this method of identification eliminates the need to list every portion of the instrumentation channel required to perform the function. In most cases, the channel number includes physical hardware. There are, however, a few places where the channel number represents only a calculation in software. In those cases, the channel data can be displayed. In many instances, the word "sensor" is used in the equipment description to identify that the item is an instrument.

Test means the actuation, operation, or establishment of specified conditions to evaluate the performance or integrity of as-built structures, systems, or components or to evaluate the performance of a program.

Transfer Open (Closed) means to move from a closed (open) position to an open (closed) position.

Type Test means a test on one or more sample components of the same type and manufacturer to qualify other components of the same type and manufacturer. A type test is not necessarily a test of the as-built structures, systems, or components.

UA of a heat exchanger means the product of the heat transfer coefficient and the surface area.

1.2 General Provisions

The following general provisions are applicable to the design descriptions and associated ITAAC.

Treatment of Individual Items

The absence of any discussion or depiction of an item in the design description or accompanying figures shall not be construed as prohibiting a licensee from utilizing such an item, unless it would prevent an item from performing its safety functions as discussed or depicted in the design description or accompanying figures.

If an inspections, tests, or analyses (ITA) requirement does not specify the temperature or other conditions under which a test must be run, then the test conditions are not constrained.

When the term "operate," "operates," or "operation" is used with respect to an item discussed in the acceptance criteria, it refers to the actuation and running of the item. When the term "exist," "exists," or "existence" is used with respect to an item discussed in the acceptance criteria, it means that the item is present and meets the design commitment.

When the Design Commitment or ITAAC provides that an item or activity must comply with ASME Code Section III, this means compliance with the ASME Code Section III, as incorporated by reference in 10 CFR 50.55a with specific conditions, or in accordance with alternatives authorized by the NRC pursuant to 10 CFR 50.55a.

Implementation of ITAAC

The ITAAC are provided in tables with the following three-column format:

Design (or Program) Commitment	Inspections, Tests, Analyses	Acceptance Criteria
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Each design or program commitment in the left-hand column of the ITAAC tables has an associated ITA requirement specified in the middle column of the tables.

The identification of a separate ITA entry for each design or program commitment shall not be construed to require that separate inspections, tests, or analyses must be performed for each design or program commitment. Instead, the activities associated with more than one ITA entry may be combined, and a single inspection, test, or analysis may be sufficient to implement more than one ITA entry.

An ITA may be performed by the licensee of the plant or by its authorized vendors, contractors, or consultants. Furthermore, an ITA may be performed by more than a single individual or group, may be implemented through discrete activities separated by time, and may be performed at any time prior to fuel load (including before issuance of the combined license for those ITAACs that do not necessarily pertain to as-installed equipment). Additionally, an ITA may be performed as part of the activities that are required to be performed under 10 CFR Part 50 (including, for example, the quality assurance (QA) program required under Appendix B to Part 50); therefore, an ITA need not be performed as a separate or discrete activity.

Many of the acceptance criteria include the words “A report exists and concludes that...” When these words are used, it indicates that the ITAAC for that design commitment will be met when it is confirmed that appropriate documentation exists and the documentation shows that the design commitment is met. Appropriate documentation can be a single document or a collection of documents that show that the stated acceptance criteria are met. Examples of appropriate documentation include design reports, test reports, inspection reports, analysis reports, evaluation reports, design and manufacturing procedures, certified data sheets, commercial dedication procedures and records, quality assurance records, calculation notes, and equipment qualification data packages. For plants at sites which are qualified using the hard rock high frequency (HRHF) ground motion response spectra (GMRS), high frequency seismic screening and qualification testing required as a result of the evaluation of potential high frequency sensitive components is included in the equipment qualification data packages.

Many entries in the ITA column of the ITAAC tables include the words “Inspection will be performed for the existence of a report verifying...” When these words are used it indicates that the ITA is tests, type tests, analyses, or a combination of tests, type tests, and analyses and a report will be produced documenting the results. This report will be available to inspectors.

Many ITAAC are only a reference to another location, either a section, subsection, or ITAAC table entry (for example, “See ITAAC table entry...”). A reference to another ITAAC location is always in both the ITA and acceptance criteria columns for a design commitment. This reference is an indication that the ITA and acceptance criteria for that design commitment are satisfied when the referenced ITA are completed and the acceptance criteria for the referenced sections, subsections, or table entries are satisfied. If a complete section is referenced, this

indicates that all the ITA and acceptance criteria in that section must be met before the referencing design commitment is satisfied.

Discussion of Matters Related to Operations

In some cases, the design descriptions in this document refer to matters that relate to operation, such as normal valve or breaker alignment during normal operation modes. Such discussions are provided solely to place the design description provisions in context (for example, to explain automatic features for opening or closing valves or breakers upon off-normal conditions). Such discussions shall not be construed as requiring operators during operation to take any particular action (for example, to maintain valves or breakers in a particular position during normal operation).

Interpretation of Figures

In many but not all cases, the design descriptions in Section 2 include one or more figures. The figures may represent a functional diagram, general structural representation, or another general illustration. For instrumentation and control (I&C) systems, figures may also represent aspects of the relevant logic of the system or part of the system. Unless specified explicitly, the figures are not indicative of the scale, location, dimensions, shape, or spatial relationships of as-built structures, systems, and components. In particular, the as-built attributes of structures, systems, and components may vary from the attributes depicted on the figures, provided that those safety functions discussed in the design description pertaining to the figure are not adversely affected.