

Response to SDAA Audit Question

Question Number: A-16.1.1-1

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Question:

TR-101310-NP, US460 Standard Design Approval Technical Specifications Development, Revision 0, Section 3.0, "Changes to the Content of Standard NuScale Technical Specifications," Subsection 3.1, "Modifications to Chapter 1 Use and Application," describes the proposed change to the definition of Pressure Boundary LEAKAGE as consistent with NUREG-1431 Revision 5 (W-STs). However, when compared to NUREG-1431 Revision 5 (W-STs), the proposed GTS 1.1 definition for Pressure Boundary LEAKAGE contains the word "nonisolable" which does not conform to the language in the W-STs. Please provide information to justify this difference between the GTS and the W-STs.

Response:

NuScale revises SDAA Part 4 Technical Specification Section 1.1, removing the word "nonisolable" from the 1.1 definition for pressure boundary leakage.

Markups of the affected changes, as described in the response, are provided below:

1.1 Definitions

LEAKAGE

LEAKAGE shall be:

a. Identified LEAKAGE

1. LEAKAGE from sources that are both specifically located and known to not interfere with the operation of leakage detection systems; or
2. Reactor Coolant System (RCS) LEAKAGE through a steam generator (SG) to the Secondary System (primary to secondary LEAKAGE);

b. Unidentified LEAKAGE

All LEAKAGE that is not identified LEAKAGE; and

c. Pressure Boundary LEAKAGE

LEAKAGE (except primary to secondary LEAKAGE) through a ~~nonisolable~~ fault in an RCS component body, pipe wall, or vessel wall. LEAKAGE past seals, packing, and gaskets is not pressure boundary LEAKAGE.

MODE

A MODE shall correspond to any one inclusive combination of reactivity condition, indicated reactor coolant temperature, PASSIVE COOLING status, control rod assembly (CRA) withdrawal capability, Chemical and Volume Control System (CVCS) and Containment Flood and Drain System (CFDS) configuration, reactor vent valve electrical isolation, and reactor vessel flange bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel.

OPERABLE-OPERABILITY

A system, subsystem, separation group, channel, division, train, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, electrical power, cooling water, lubrication, and other auxiliary equipment that are required for the system, subsystem, separation group, channel, division, train, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).