

Response to SDAA Audit Question

Question Number: A-16.5.5.09-2

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Question:

When compared to NUREG-1431 Revision 5 (W-STS), GTS 5.5.9, “Containment Leakage Rate Testing (CLRT) Program,” Option B, proposed paragraph “b” should be treated as an exception to paragraph “a”. Please provide information to justify this difference between the GTS and the W-STS.

Response:

NuScale revises SDAA Part 4 Technical Specification Section 5.5.9, “Containment Leakage Rate Testing (CLRT) Program,” Option B, paragraph a.to include “as modified by the following exception:.”

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

5.5 Programs and Manuals

5.5.9 Containment Leakage Rate Testing Program

[OPTION A]

- a. A program shall implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option A, as modified by approved exemptions.
- b. The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.20% of containment air weight per day.
- c. Containment leakage rate acceptance criterion is ~~≤ 0.60~~ ≤ 1.0 L_a . During the first unit startup following testing in accordance with this program, the leakage rate acceptance criterion ~~is~~ ~~are~~ ≤ 0.60 L_a for the Type B and Type C tests.
- d. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.
- e. Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.

[OPTION B]

- a. A program shall establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Nuclear Energy Institute (NEI) Topical Report (TR) NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J," Revision 3-A, dated July 2012, as modified by the following exception:-
 1. The visual examination of the containment intended to fulfill the requirements of 10 CFR 50, Appendix J, Option B, will be performed in accordance with the requirements of and frequency specified by the ASME Section XI Code, Subsection IWE, except where alternative examination methods or relief has been authorized by the NRC.
- b. The calculated peak containment internal pressure for the design basis accident, P_a , is ~~[940] psia~~ ~~940~~. The containment design pressure is 1200 psia.

5.5 Programs and Manuals

5.5.9 Containment Leakage Rate Testing Program (continued)

- c. The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.20% of containment air weight per day.
- d. ~~Containment leakage rate acceptance criterion is $< 0.60 L_a$ for the combined Type B and C tests.~~ Containment leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criterion is $\leq 0.60 L_a$ for the Type B and Type C tests.
- e. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.
- f. Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.

5.5.10 Setpoint Program (SP)

- a. The Setpoint Program (SP) implements the regulatory requirement of 10 CFR 50.36(c)(1)(ii)(A) that technical specifications will include items in the category of limiting safety system settings (LSSS), which are settings for automatic protective devices related to those variables having significant safety functions.
- b. The Limiting Trip Setpoint (LTSP), Nominal Trip Setpoint (NTSP), As-Found Tolerance (AFT), and As-Left Tolerance (ALT) for each Technical Specification required automatic protection instrumentation function shall be calculated in conformance with [TR-122844-P, Rev. 0, "NuScale Instrument Setpoint Methodology."]
- c. For each Technical Specification required automatic protection instrumentation function, performance of a CHANNEL CALIBRATION surveillance "in accordance with the Setpoint Program (SP)" shall include the following: