

## NRC Staff Comments on NEI 99-01 Revision 7 Change Summary July 2024 [DRAFT J1]

Rev. 6 IC and EAL#	Rev. 6 Wording	Rev. 7 IC and EAL#	Rev. 7 Wording	Change Summary/Basis
FPB Table 9-F-2 RCS Barrier Loss 4.A	Primary containment radiation monitor reading greater than (site-specific value).	FPB Table F-2 RCS Barrier Loss 4.A	<p>A. 1. Containment radiation monitor reading greater than (site-specific value).</p> <p><b>AND</b></p> <p>2. Injection flow to address RCS leakage has resulted in CST level less than (site-specific).</p>	<p>The NRC staff disagrees on the need for a second threshold condition to be added that contains a CST level corresponding to that expected if all RCS mass was released into the containment. The NRC staff agrees that the containment radiation monitor threshold value assumes an instantaneous release and dispersal of the reactor coolant noble gas and iodine inventory, with RCS activity at Technical Specification allowable limits, into the containment atmosphere. The staff agrees a containment monitors could “see” radioactive shine from RCS piping sources and potentially display elevated readings in the absence of any RCS leakage, however, disagrees that the first indication of a loss of the RCS barrier would be a “CST level corresponding to that expected if all RCS mass was released into the containment.”</p>

Rev. 6 IC and EAL#	Rev. 6 Wording	Rev. 7 IC and EAL#	Rev. 7 Wording	Change Summary/Basis
FPB Table 9-F-3 RCS Barrier Loss 3.A	A. Containment radiation monitor reading greater than (site-specific value).	FPB Table F-3 RCS Barrier Loss 3.A	A. 1. Containment radiation monitor reading greater than (site-specific value).  <b>AND</b>  2. Injection flow to address RCS leakage has resulted in RWST level less than (site-specific).	The NRC staff disagrees on the need for a second threshold condition to be added that contains a CST level corresponding to that expected if all RCS mass was released into the containment. The NRC staff agrees that the containment radiation monitor threshold value assumes an instantaneous release and dispersal of the reactor coolant noble gas and iodine inventory, with RCS activity at Technical Specification allowable limits, into the containment atmosphere. The staff agrees a containment monitors could “see” radioactive shine from RCS piping sources and potentially display elevated readings in the absence of any RCS leakage, however, disagrees that the first indication of a loss of the RCS barrier would be a “CST level corresponding to that expected if all RCS mass was released into the containment.”
FPB Table 9-F-3 CNMT Barrier Potential Loss 4.C	B. Explosive mixture exists inside containment  <b>OR</b> C. 1. Containment pressure greater than (site-specific pressure setpoint)  <b>AND</b> 2. Less than one full train of (site-specific system or equipment) is operating per design for 15 minutes or longer.	FPB Table F-3 CNMT Barrier Potential Loss 4.C	B. Flammable mixture in containment atmosphere.  <b>OR</b> C. 1. Containment pressure greater than (site-specific pressure setpoint)  <b>AND</b> 2. Less than one full train of (site-specific system or equipment) is operating per design for 15 minutes or longer. [Ice condenser plants only]	<i>Missing the “OR” between B and C.</i>