U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

INSERVICE EXAMINATION DCD/RCOL LEVEL OF DETAIL

T.K. Steingass
NRO/DE/CIB2
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DCD SUBMITTAL

- The ISI program should be described at a level of detail sufficient to assess how the plant is designed and provided with access to meet ASME Code, Section XI ISI requirements
- Stating that the program will comply with ASME Section XI, or Generic Letter 88-05 is insufficient
- SRP 5.2.4 and 6.6 provide guidance necessary to assess the design aspects of the ISI program

DCD SUBMITTAL

- The staff reviews the DCD to assure that operational lessons learned are incorporated into the design
- The DCD/RCOLA submittals together should fully describe the ISI operational program and its implementation and provide for continuity of information

CONTINUITY OF INFORMATION

- The DCD should clarify that the design does not result in any Code ISI exemptions (relief requests) due to design, geometry and materials of construction
- COL applicant should ensure that it preserves the design and accessibility during construction
- DCD should identify the responsibility of the COL applicant to submit relief requests to later Code requirements, if needed
- COL applicant discusses need for relief requests

U.S. APWR DCD/RCOLA EXAMPLES

- DCD states that the COL applicant discusses relief requests – DCD did not state if there were design-related relief requests – RCOLA IBR
- DCD states that Code exemptions are submitted by COL applicant – RCOLA IBR
- DCD states that Code Cases referenced by COL applicant comply with RG 1.147 – RCOLA states it uses no Code Cases beyond those listed in the referenced DCD.
- Neither DCD/RCOLA discusses implementation of ASME CC N-729-1 as modified and required in 10 CFR 50.55a(g)(6)(ii)(D)

EXAMPLES CONTINUED

- DCD does not discuss how the design addresses GL 88-05 for Boric Acid Leak Detection Operational Program - RCOLA discusses the program in an insufficient level of detail for the staff to evaluate its implementation
- DCD uses ambiguous terminology that it will design to enable the performance of ISI examinations "to the extent practical" in various places – RCOLA IBR

CONCLUSIONS

- Level of detail provided in DCD is insufficient for staff to reach a reasonable assurance finding of acceptability of the design and access to enable ISI and provide for an adequate Boric Acid Leakage Operational Program
- Operational lessons learned that were incorporated into the design need more specificity
- Significant ISI operational issues addressed in Generic Letters and regulations (GL 88-05, N-729-1) should be discussed in more detail to assess implementation
- More collaboration between the DCD/RCOLA may be needed to address ISI program description and its implementation