## Karwoski, Kenneth

190

From:

Karwoski, Kenneth

Sent:

Monday, September 19, 2011 10:36 AM

To: Cc: Wilson, George Khanna, Meena

Subject:

Acceptance Criteria Revision 2

George,

Any better?

Ken

North Anna may use a variety of approaches for ensuring that no functional damage occurred as a result of the earthquake,

For example, the licensee may analyze and evaluate the actual earthquake to show that SSCs were not adversely affected. In lieu of analyses/evaluations or in combination with them, the licensee may inspect and/or test various SSCs to demonstrate that there was no functional damage.

The licensee's submittal should be reviewed to confirm that the licensee's analyses, evaluations, inspections, or tests, as appropriate, are adequate for demonstrating that no functional damage resulted from the earthquake.

The review should include systems, subsystems, trains, components and devices (systems, structures, or components [SSCs]) (1) that are required to be operable by TSs, (2) SSCs not explicitly required to be operable by TSs, but that perform required support functions to maintain a TS required system operable (e.g., SSCs inspected/tested per the ASME Code); and (3) SSCs that are not described in TSs but which warrant programmatic controls to ensure that SSC availability and reliability are maintained (e.g., non-safety related SSCs that are risk significant). Refer to NRC Inspection Manual Part 9900, "Operability Determinations and Functionality Assessments for Resolution of Degraded or NonConforming Conditions Adverse to Quality or Safety" for more detailed guidance for determinations of operability and resolution of degraded or nonconforming conditions.

Note: For ground motions less than 0.3 g, only a few SSCs at North Anna were identified during the IPEEE review that did not have a high confidence of low probability of failure. These SSCs probably warrant increased attention (they are identified in the licensee's submittal).

D/190