

March 7, 2002

ORGANIZATION: NUCLEAR ENERGY INSTITUTE

SUBJECT: SUMMARY OF MEETING WITH THE NUCLEAR ENERGY INSTITUTE (NEI) ON REVISED STAFF GUIDANCE ON SCOPING OF EQUIPMENT RELIED ON TO MEET THE REQUIREMENTS OF THE STATION BLACKOUT (SBO) RULE FOR LICENSE RENEWAL

On February 14, 2002, the U. S. Nuclear Regulatory Commission staff met with the NEI and other industry representatives to discuss NEI's latest response to the staff's proposed position on the subject, which was transmitted for their comments on January 28, 2002. During the January 15, 2002 meeting, the staff agreed to clarify its early proposed position that was provided to NEI and the Union of Concerned Scientists (UCS) in a letter dated November 14, 2001. In both of these letters, the staff took a position that the offsite power system should be included in the scope of license renewal to comply with the SBO rule. The purpose of this meeting was to understand the positions of all participants with regarding to the scoping of the offsite power system equipment for license renewal and to reach a common agreement. Attached are the meeting agenda (Attachment 1), a handout (Attachment 2) provided during the meeting by the NEI, and the list of meeting attendees (Attachment 3).

The meeting began with an NEI presentation on their understanding of the role of the offsite power source (i.e., switchyard) with regard to the SBO rule (10 CFR 50.63) and the license renewal rule (10 CFR 54.4) using excerpts from their latest response, and their basis why the offsite power system should be not included within the scope of license renewal. The presentation focused on scoping guidance under the license renewal rule, determination of acceptable coping duration based on the guidance document, development of and training on plant procedures to restore ac power, and the role of the alternate ac (AAC) power source under the SBO rule. The presentation concluded that the SBO rule does not exclusively specify or rely on restoration of offsite power as the means to recover from an SBO event. Rather, it is incumbent on each applicant to confirm for their plant the level of reliance placed on the restoration of offsite power to demonstrate compliance with the SBO rule.

After the presentation, more discussion ensued on the role of an offsite power source in complying with the SBO rule and the license renewal rule.

When the staff was evaluating a plant for compliance with the SBO rule, NEI stated that the evaluation did not identify any specific offsite power system components in the safety evaluation for recovering from an SBO event and the SBO rule only requires development of a training program on plant procedures to restore an ac power source. On this basis, NEI also stated that an emergency diesel is their preferred power source for recovery from an SBO event. However, the staff noted that the safety evaluation includes the offsite power system diagram; thus, there is no need to identify any offsite power system by its components.

The staff reiterated the fact that the recovery time of ac power from an offsite power source is generally shorter than that of an onsite power source based on the historical data collected over the years. Thus, coping times for SBO would be longer if recovery of offsite power was not considered for an SBO event. The staff concluded recovery from an SBO event must include the restoration of the offsite power source. The staff asked NEI for any data that would support recovery of an emergency diesel that is of shorter duration than that of the offsite power source.

Much conversation was held on the recovery of the power sources that should be considered for compliance with the SBO rule. In the recovery from an SBO event, it cannot be predicted which power source would be available to recover first. The staff stated that this inability to determine which one of the power sources would be recovered first during an SBO event is the basis for scoping in both power sources for license renewal. In addition, there were some discussions how far the offsite power system components in the switchyard should be extended from the plant for the scoping for license renewal.

Finally, the role of AAC power sources under the SBO rule was discussed. The staff maintained that AAC power sources in the SBO rule are only for coping with an SBO, but not to recover from an SBO event. Some discussion followed on how to scope in the excess capacity of AAC power sources that was used to satisfy the SBO rule for license renewal.

As a result of the discussion, both the staff and NEI continued their dialogue to achieve a better understanding of their respective positions. The staff agreed to re-state its position and forward it to NEI and UCS within 2 weeks.

/RA/

Peter J. Kang, Reactor Systems Engineer  
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Scoping of Equipment to meet SBO Rule  
February 14, 2002

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