

From: "BELL, Russ" <rjb@nei.org>
To: "Joe Colaccino" <JXC1@nrc.gov>
Date: 11/22/05 3:47PM
Subject: Dec. 1-2 COLA meeting

The attachments outline some topics we plan to discuss with the staff on 12/1 in the areas of training and severe accident change process.

In addition, to prepare for the discussion planned for 10AM, the staff should familiarize themselves with the new material in N0401E in section 4.3.9 related to addressing USI/GSI/TMI/RGs, and please consider what the staff's expectations are for this review. In this regard, can you point me to SRP or other reviewer guidance concerning compliance with such regulatory criteria?

We are looking forward to the meeting.

Have a great Thanksgiving Holiday!

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From: "BELL, Russ" <rjb@nei.org>

Created By: rjb@nei.org

Recipients

nrc.gov
owf4_po.OWFN_DO
JXC1 (Joseph Colaccino)

Post Office

owf4_po.OWFN_DO

Route

nrc.gov

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Training and Qualification of Staff for New Nuclear Power Plants
NEI Meeting with NRC
December 1, 2005

Discussion Topics

- Industry strategy to effectively train and qualify new NPP Personnel based on the existing training and accreditation process as recognized by NRC (10 CFR 55.31(a)(4) and 55.59(c)).
- Applying the normal National Academy for Nuclear Training process to achieve accreditation prior to fuel load
- Licensing basis for COL:
 - License condition(s) per SECY-05-0197
 - Appropriate FSAR description
- Related topics
 - Phased implementation of training programs
 - Use of existing qualified staff
 - Required requal program implementation timing
 - Nominal timeline

Special change process for severe accident issues – 11/22/05

Section VIII.B.5.c of the design certification rules:

A proposed departure from Tier 2 affecting resolution of a severe accident issue identified in the plant-specific DCD, requires a license amendment if:

- (1) There is a substantial increase in the probability of a severe accident such that a particular severe accident previously reviewed and determined to be not credible could become credible; or
- (2) There is a substantial increase in the consequences to the public of a particular severe accident previously reviewed.

Dec. 1 Discussion Topics

0. History of issue

1. Scope of applicability of Section VIII.B.5.c

AP1000 NOPR says the following:

The Commission believes that the resolution of severe accident issues should be preserved and maintained in the same fashion as all other safety issues that were resolved during the design certification review (refer to SRM on SECY-90-377). However, because of the increased uncertainty in severe accident issue resolutions, the Commission has proposed separate criteria in paragraph B.5.c for determining if a departure from information that resolves severe accident issues would require a license amendment. **For purposes of applying the special criteria in paragraph B.5.c, severe accident resolutions would be limited to design features when the intended function of the design feature is relied upon to resolve postulated accidents when the reactor core has melted and exited the reactor vessel, and the containment is being challenged.** These design features are identified in section 1.9.5 and appendix 19B of the DCD, with other issues, and are described in other sections of the DCD. Therefore, the location of design information in the DCD is not important to the application of this special procedure for severe accident issues. However, the special procedure in paragraph B.5.c would not apply to design features that resolve so-called "beyond design basis accidents" or other low probability events. The important aspect of this special procedure is that it would be limited to severe accident design features, as defined above. Some design features may have intended functions to meet "design basis" requirements and to resolve "severe accidents." If these design features are reviewed under paragraph VIII.B.5, then the appropriate criteria from either

paragraphs B.5.b or B.5.c would be selected depending upon the function being changed.

2. Compatibility of VIII.B.5.c criteria to the scope prescribed in the SOC

Section B.5.c suggests applicability to a broader scope of severe accident issues than defined in the Statements of Consideration

- “departure ... affecting resolution of a severe accident issue”
- Criterion B.5.c(1) focus on probability of a “severe accident”

3. Expectations regarding applicability of VIII.B.5.b to the beyond design basis issues, features and analyses described in the balance of Chapter 19 of the DCD

4. Related Discussion

- Scope of applicability (definition of “severe accident issue”)
- Screening & evaluation Process
- Definitions (e.g., “substantial increase;” “credible”)

Application of 50.59-Related Definitions from NEI 96-07, R1, (RG.1.187)

“Departure” from Tier 2 of the DCD

(“Change” in the facility as described in the FSAR)



i.e., affects “design function”



i.e. supports or impacts a “design basis function”



i.e., either (1) required to meet NRC requirements, or
(2) credited in “safety analyses”



i.e.,

- analyses in DCD/FSAR Chapters 6, 15
- supporting analyses
- analyses of turbine missiles, fires, floods, earthquakes, SBO, ATWS, etc.