

August 29, 2006

MEMORANDUM TO: Sher Bahadur, Chairman
Committee To Review Generic Requirements

FROM: Gary M. Holahan, Associate Director **/RA/**
for Risk Assessment and New Projects
Office of Nuclear Reactor Regulation

SUBJECT: TRANSMITTAL OF PROPOSED REVISION TO STANDARD
REVIEW PLAN NUREG-0800, SECTION 9.1.3, REVISION 2,
"SPENT FUEL POOL COOLING AND CLEANUP SYSTEM"

The purpose of this memorandum is to transmit the proposed revision to NUREG-0800, *Standard Review Plan* (SRP), Section 9.1.3, Revision 2, "Spent Fuel Pool Cooling and Cleanup System," to the Committee To Review Generic Requirements (CRGR) for its consideration.

In accordance with the staff requirements memorandum dated May 10, 2005, on the April 6, 2005, Commission meeting, the Office of Nuclear Reactor Regulation (NRR) has revised SRP Section 9.1.3 (Enclosure 1). To aid in identifying the areas of revision, a redline/strikeout version of this document is also included (Enclosure 2).

The proposed revision updates Revision 1, dated July 1981, and includes most of the changes introduced in the draft Revision 2 of April 1996. In general, changes consist mostly of assigning the review responsibilities by function, with the responsible organizations maintained separately from the SRP itself to minimize impacts of office reorganizations; making editorial and formatting changes as part of the SRP update effort; and updating some references. The revision removes the citation to General Design Criteria (GDC) 44, 45, and 46, since these criteria are embodied in GDC 61 for this system; as such, the overall acceptance criteria in the revised section did not change. In addition, technical rationale elaborating on the acceptance criteria was added to the SRP. The revision also adds standard paragraphs to extend application of the updated SRP section to prospective submittals by applicants pursuant to 10 CFR Part 52.

Several specific changes are worth noting:

The staff is introducing changes in the staff's position with regard to evaluation criteria for spent fuel pool cooling systems (SFPCSs). These changes are needed to provide comprehensive review standards that reflect current standard practices, and to allow consideration of more flexible measures to manage heat loads while maintaining adequate SFP cooling capacity during normal operations. These changes are consistent with the U.S. Nuclear Regulatory Commission's (NRC's) move to performance-based and risk-informed regulation.

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The revised SRP Section 9.1.3 does not impose any new or amended requirements in either the Commission's rules or the staff's regulatory positions interpreting those rules, and it does not require any modification for current operating reactor licensees. Rather, this revised SRP section modifies review criteria for spent fuel pool cooling and cleanup systems for future plants, while allowing licensees of current operating reactors to voluntarily convert to the methodology described therein. Consequently, a backfit analysis is not required for this revised SRP Section 9.1.3; therefore, we request a waiver of review by CRGR. If the CRGR determines that there is a need to review the proposed revision to the SRP, the staff requests that CRGR inform the technical contact and NRR will support a CRGR briefing in advance of issuance.

Most SRP sections will be issued as final versions without publishing them as drafts and requesting comment. The staff is revising the SRP in this manner to provide a more up-to-date SRP in light of the requirement in 10 CFR 50.34(h) for an applicant to evaluate its facility against the SRP revision in effect 6 months before the docket date of the application. The staff will nonetheless request comment on these final SRP sections, and will address comments received in a subsequent SRP revision. Prior to revision of individual sections, comment resolution may establish that alternatives to the NUREG-0800 acceptance criteria provide an acceptable method of complying with the NRC's regulations.

Future correspondence with the CRGR will be limited to those SRP revisions which contain new staff positions. Given the volume of SRP sections being revised, we will no longer provide the revised SRP sections that do not contain new staff positions to you for your information.

Separately, we have recommended that the Advisory Committee on Reactor Safeguards elect not to review the proposed revision to the SRP.

Enclosures:

1. Proposed Version of SRP 9.1.3, Rev. 2
2. Redline/Strikeout Version

The revised SRP Section 9.1.3 does not impose any new or amended requirements in either the Commission's rules or the staff's regulatory positions interpreting those rules, and it does not require any modification for current operating reactor licensees. Rather, this revised SRP section modifies review criteria for spent fuel pool cooling and cleanup systems for future plants, while allowing licensees of current operating reactors to voluntarily convert to the methodology described therein. Consequently, a backfit analysis is not required for this revised SRP Section 9.1.3; therefore, we request a waiver of review by CRGR. If the CRGR determines that there is a need to review the proposed revision to the SRP, the staff requests that CRGR inform the technical contact and NRR will support a CRGR briefing in advance of issuance.

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