

White, Bernard

From: Weaver, Doug
Sent: Tuesday, March 29, 2011 8:38 AM
To: Benner, Eric; Pearson, Jim
Cc: White, Bernard; Ordaz, Vonna
Subject: RE: NOT FOR PUBLIC DISCLOSURE - Re: Development of a TI to assess adequacies of NMSS Licensees/CoC Holders to cope in regard to recent Japanese events

Eric,

I spoke with Anne Boland this morning. We agreed that it would make sense to do a "TI light" at the decommissioned facilities with spent fuel pools.

Please stop by so we can discuss next steps.

Doug

From: Benner, Eric
Sent: Tuesday, March 29, 2011 8:29 AM
To: Pearson, Jim; Weaver, Doug
Cc: White, Bernard
Subject: RE: NOT FOR PUBLIC DISCLOSURE - Re: Development of a TI to assess adequacies of NMSS Licensees/CoC Holders to cope in regard to recent Japanese events

Sorry I'm late to the game, but the attached also discusses why SFPs at decommissioned reactors were not required to implement B.5.b (this logic was also used for why the TI did not include them).

From: Pearson, Jim
Sent: Tuesday, March 29, 2011 8:19 AM
To: Weaver, Doug
Cc: White, Bernard; Benner, Eric
Subject: NOT FOR PUBLIC DISCLOSURE - Re: Development of a TI to assess adequacies of NMSS Licensees/CoC Holders to cope in regard to recent Japanese events

NOT FOR PUBLIC DISCLOSURE

Doug,

We believe that such a TI is not needed for SFST. Reviews of NRR's TI, portions of the Holtec FSAR (attached) (example of analysis for cask flooding & vent blockage), and the Region III GE Morris input (attached) indicates, as we know, that the passive cask systems are much different than a reactor facility. Even GE Morris is passive to the extent that water is expected to remain in a 25' reservoir created by bedrock to protect stored fuel. As an example of a cask system analysis, The Holtec HI-STORM FSAR, Section 11.2.13 discusses 100% blockage of air vents, and 11.2.14, complete burial under debris. Both FSAR analysis show there is sufficient time (72 and 100 hrs respectively) to clear the vents and maintain actual fuel cladding temperatures well below short-term temperature limits. Consequently, the need for immediate and sustained cooling or power sources needed for a reactor core and spent fuel pool would not be as significant to support spent fuel storage beyond design based events.

The NRR TI focuses on four areas of concern as follows: (extracted from the TI itself)

03.01 Assess the licensee's capability to mitigate conditions that result from beyond design basis events, typically bounded by security threats, committed to as part of NRC Security Order Section B.5.b issued February 25, 2002, and severe accident

management guidelines and as required by Title 10 of the Code of Federal Regulations (10 CFR) 50.54(hh).

03.02 Assess the licensee's capability to mitigate station blackout (SBO) conditions, as required by 10 CFR 50.63, "Loss of All Alternating Current Power," and station design, is functional and valid.

03.03 Assess the licensee's capability to mitigate internal and external flooding events required by station design.

03.04 Assess the thoroughness of the licensee's walkdowns and inspections of important equipment needed to mitigate fire and flood events to identify the potential that the equipment's function could be lost during seismic events possible for the site.

It should be pointed out that all of these TI actions involve reviews against plant systems and how to mitigate or respond to beyond design basis events. With the exception of GE Morris (See attached), cask systems are passive and require no active components to maintain their cooling/safety function. Casks are not affected by SBO and they are designed to withstand significant fire exposure, explosions, and flood conditions. Basically, casks are very robust systems. All ISFSI sites are required to have cask contingency plans in place for such things as flooding, fires, tornado, etc... to verify that after an event the casks have maintained integrity, and that cooling vents have not been blocked (See Holtec FSAR-attached). The latter is a particular concern for post-flooding scenarios in ensuring that flood debris is not covering the vents. The issue of how cask systems would respond to beyond design basis seismic events would need to be evaluated on a site specific basis and we do not believe would be a suitable action for a TI at this time.

NOT FOR PUBLIC DISCLOSURE

From: Temps, Robert
Sent: Monday, March 28, 2011 8:32 AM
To: Weaver, Doug
Cc: Pearson, Jim
Subject: RE: New NRC Daily Notes for March 25, 2011

Doug,

Here's a link to the TI in question.

Rob

<http://pbadupws.nrc.gov/docs/ML1107/ML11077A007.pdf>

From: Weaver, Doug
Sent: Monday, March 28, 2011 7:43 AM
To: Temps, Robert
Cc: Benner, Eric; White, Bernard; Waters, Michael
Subject: FW: New NRC Daily Notes for March 25, 2011

Rob,

Please take for action. Stop by if you would like to discuss.

Doug

From: Ordaz, Vonna
Sent: Monday, March 28, 2011 7:22 AM
To: Weaver, Doug
Subject: Fw: New NRC Daily Notes for March 25, 2011

Please check and let me know.

Thanks

From: Haney, Catherine
To: Ordaz, Vonna; Kinneman, John
Sent: Fri Mar 25 21:41:15 2011
Subject: Fw: New NRC Daily Notes for March 25, 2011

Note TI for reactors. Should we do something similar for our licensees/certificate holders. If no, please explain why.

From: NRC Daily Notes <EDO.GroupAccount@nrc.gov>
To: EDO GroupAccount
Cc: Pena, Alex
Sent: Fri Mar 25 16:00:09 2011
Subject: New NRC Daily Notes for March 25, 2011

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Daily Notes for March 25, 2011

Outside of Scope

NRR

(OUO-SII)

On March 23 the TI (Temporary Instruction) to independently assess the adequacies of US Nuclear Plants in response to the recent Japanese Fukushima Nuclear Power Plant events was issued. The TI will assess licensee's capabilities to cope with beyond design basis events, station blackouts and flooding events. The equipment staged and preparations for these events will also be assessed under the TI. Completion of this TI at all sites is expected by April 29, and a final report should be available by May 13.

Outside of Scope

*out of
scope*