

June 14, 2012

Mr. Adrian P. Heymer, Executive Director
Strategic Programs
Nuclear Energy Institute
1776 I St NW, Suite 400
Washington, DC 20006-3708

SUBJECT: ENDORSEMENT OF NUCLEAR ENERGY INSTITUTE (NEI) 12-07,
“GUIDELINES FOR PERFORMING VERIFICATION WALKDOWNS OF PLANT
FLOOD PROTECTION FEATURES”

Dear Mr. Heymer:

On May 21, 2012, the Nuclear Energy Institute (NEI) requested NRC’s endorsement of NEI 12-07,¹ “Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features.” NEI 12-07 was submitted to support licensee responses to Enclosure 4 of the March 12, 2012,² information request that was issued pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f). The 10 CFR 50.54(f) letter was issued in the course of implementing the lessons learned from the accident at the Fukushima Dai-ichi nuclear facility. Enclosure 4 requested that licensees perform walkdowns of their plants to confirm compliance with their current licensing basis.

By letter dated May 31, 2012,³ the NRC staff confirmed that NEI 12-07 described an adequate process for performing the flood protection walkdowns with two necessary changes. One of these changes was to add a citation reference to NUREG-1852, “Demonstrating the Feasibility and Reliability of Operator Manual Actions in Response to Fire,” as an additional information source that licensees may consider when evaluating operator manual actions.

By letter dated June 5, 2012,⁴ you expressed a concern with referencing the NUREG as an additional information source. Specifically, you indicated that including an informational reference without a thorough review and discussion of its implications for flooding walkdowns raises the potential for confusion. Additionally, you indicated that the inclusion of NUREG-1852 in NEI 12-07 could adversely impact completion of the walkdowns in an “efficient, effective, and expeditious” manner.

The NRC understands the concern expressed in your letter and agrees that the walkdown guidance should be clear and support timely implementation of the walkdowns. However, the NRC does not agree that the addition of a citation reference to the NEI guidance will negatively affect performance of the walkdowns. Instead, the NRC considers it appropriate to include a reference to existing agency guidance on a related topic. To be clear, the inclusion of the reference to NUREG-1852 is for informational purposes only and does not constitute specific

¹ NEI 12-07 is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML121440522.

² The 50.54(f) letter is available in ADAMS under Accession No. ML12053A340.

³ The May 31, 2012, letter is available in ADAMS under Accession No. ML12144A142.

⁴ The June 5, 2012, letter is available in ADAMS under Accession No. ML12165A215.

A. Heymer

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guidance that should be followed. The guidance that licensees should follow is the reasonable simulation approach in NEI 12-07; however, it is appropriate to acknowledge other existing and potentially useful agency guidance that is available for licensees to consider in the performance of the walkdowns.

As requested in the May 31, 2012, letter, the NRC requests that NEI publish an accepted version of NEI 12-07. The accepted version shall make the necessary changes in Enclosure 1 of the May 31 letter, incorporate this letter between the title page and the first section, and add an "-A" (designating accepted) following the report identification number. If you, or your staff, have additional questions, please contact myself or Mr. G. Edward Miller at 301-415-2481, or by email at Ed.Miller@nrc.gov.

Sincerely,

/RA by Robert M. Taylor for/

David L. Skeen, Director
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc: E. Leeds
G. Tracy
G. Holahan
R. Taylor

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ADAMS Accession No.: ML12159A290

*Concurrence via e-mail

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