

September 5, 2012

MEMORANDUM TO: Matthew A. Mitchell, Chief
Projects Management Branch
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

FROM: Lisa M. Regner, Senior Project Manager /RA/
Projects Management Branch
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 14, 2012, PUBLIC MEETING TO
DISCUSS THE GUIDANCE FOR COMPLIANCE WITH ORDER
EA-12-051, SPENT FUEL POOL INSTRUMENTATION,
RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER
PLANT ACCIDENT

On August 14, 2012, the U.S. Nuclear Regulatory Commission (NRC or the staff) staff held a public meeting to discuss the draft interim staff guidance (ISG) for compliance with Order EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation* (the order) issued March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A679) with the Nuclear Energy Institute (NEI) Task Force. The order was issued based, in part, on the *Near-Term Task Force (NTTF) Recommendations for Enhancing Reactor Safety in the 21st Century* report, issued July 12, 2011 (ADAMS Accession No. ML111861807). Those in attendance are listed in the enclosure (ADAMS Accession No.: ML12237A189).

The purpose of this meeting was to inform the NEI Task Force of the need for more specific seismic criteria in NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,"* Revision 0, submitted on July 5, 2012, for staff endorsement (ADAMS Accession No. ML121910388). In support of the order, a final ISG document will be issued by the staff by August 31, 2012.

The staff noted that more specific acceptance criteria was needed to ensure the spent fuel pool level instruments will withstand a seismic event. The staff recommended the use of portions of Regulatory Guide (RG) 1.100, Revision 3, September 2009, "Seismic Qualification of Electrical and Active Mechanical Equipment and Function Qualification of Active Mechanical Equipment for Nuclear Power Plants." This RG endorses an Institute of Electrical Electronics Engineers (IEEE) standard for seismic qualification of instrumentation: Standard 344-2004, "IEEE Recommended Practice for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations." The staff noted that seismic qualification is not necessary and that only portions of the IEEE standard need be used to provide the appropriate acceptance criteria. The staff also noted that use of RG 1.100 provides one acceptable option, but that the industry may propose alternative criteria as long as it addresses the susceptibility of these instruments to seismic motion.

Portions of the IEEE 344 standard provide acceptance standards for the design, analysis, testing, and operating experience criteria that can be used to ensure the seismic reliability of instruments. The staff stated that all of the standards set forth in RG 1.100 are not necessary.

The NEI staff requested information on the scope of applicability of RG 1.100. The staff clarified that only installed instrument components need to meet the seismic motions standards; any portable equipment is expected to be reasonably rugged and protected in accordance with JLD-ISG-12-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events." Further, they requested information on the applicability of RG 1.100 to other Fukushima orders. The staff stated it would evaluate the applicability to other Fukushima orders.

Public comments were received from several stakeholders and included concerns about addressing seismic criteria in the other Fukushima orders, that existing design basis earthquake standards at the nuclear plants are not adequate, why the industry is not familiar with its own standards, and whether staff addressed protection of the spent fuel pool instrumentation from damage by non-safety related equipment.

No meeting feedback forms were received.

Enclosure:
As stated

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