

Table 1. Comparison of NTTF Recommendations 4 and 7, EA-12-049 and Rulemaking Requirements

NTTF Recommendations	Addressed in EA-12-049?	Addressed in SBO Mitigating Strategies Rule?
Revise 10 CFR 50.63	Order issued with supporting Interim Staff Guidance	Revise 50.63 and potentially add 50.54(ii)
4.1 (1) Establish a minimum coping time of 8 hours for a loss of all ac power.	Yes: Performance-based approach: Phase I must overlap with phase II (indefinite coping)	The rule would contain performance-based phase I requirements: Phase I must overlap with phase II (indefinite coping)
4.1 (2) Establish the equipment, procedures, and training necessary to implement an "extended loss of all ac" coping time of 72 hours for core and spent fuel pool cooling and for reactor coolant system and primary containment integrity as needed.	Yes: Performance-based approach: Phase II must overlap with Phase III (indefinite coping)	The rule would contain performance-based phase II requirements: Phase II must overlap with Phase III (indefinite coping)
4.1 (3) preplan and prestage offsite resources to support uninterrupted core and spent fuel pool cooling, and reactor coolant system and containment integrity as needed, including the ability to deliver the equipment to the site in the time period allowed for extended coping, under conditions involving significant degradation of offsite transportation infrastructure associated with significant natural disasters.	Yes: Performance based approach for Phase III (indefinite coping)	The rule would contain performance-based Phase III requirements (indefinite coping)
4.1 (4) The 8-hour coping systems and equipment would be protected from damage from all design-basis events and extended beyond-design-basis events by either locating the equipment one level (i.e., 5 to 6 meters (15 to 20 feet)) above the plant design-basis flooding level or in water-tight enclosures.	No: EA-12-049 allows use of safety-related installed equipment (i.e., existing GDC-2 design basis) for Phase I.	The rule would allow use of safety-related installed equipment (i.e., existing GDC-2 design basis) for Phase I. Changes to the external design basis may occur as a result of NTTF Recommendation 2.1 and could impact the mitigating strategies.
*4.2 Order licensees to provide reasonable protection for equipment currently provided pursuant to 10 CFR 50.54(hh)(2) from the effects of design-basis external events.	Yes: Reasonable protection of equipment associated with mitigation strategies is required	The rule would require the reasonable protection of equipment associated with mitigation strategies
*4.2: Order licensees to add equipment as needed to address multiunit events and offer additional defense-in-depth while other requirements are being revised and implemented.	Yes: EA-12-049 implementation guidance specifies N+1 sets of portable onsite equipment for strategy maintenance	The rule would allow for implementation using N+1 sets of portable onsite equipment for strategy maintenance
7.1 Order licensees to provide sufficient safety-related instrumentation, able to withstand design-basis natural phenomena, to monitor key spent fuel pool parameters (i.e., water level, temperature, and area radiation levels) from the control room.	EA-12-049 makes use of the level instrumentation imposed by EA-12-051 (Note that only reliable, level instrumentation was imposed)	The rule would make use of the level instrumentation imposed by EA-12-051 (Note that only reliable, level instrumentation was imposed)
7.2 Order licensees to provide safety-related ac electrical power for the spent fuel pool makeup system.	Meets intent: EA-12-049 spent fuel pool strategy uses ac independent (self-powered), reliable, portable pump	The rule would incorporate the EA-12-049 spent fuel pool strategy that uses ac independent (self-powered), reliable portable pump
7.3 Order licensees to revise their technical specifications to address requirements to have one train of onsite emergency electrical power operable for spent fuel pool makeup and spent fuel pool instrumentation when there is irradiated fuel in the spent fuel pool, regardless of the operational mode of the reactor.	Meets intent: EA-12-049 spent fuel pool strategy must be capable of being implemented in all modes and uses programmatic controls for availability of strategies with specified out-of-service times.	The rule would incorporate the EA-12-049 spent fuel pool strategy that is to be capable of being implemented in all modes and include the programmatic controls
7.4 Order licensees to have an installed seismically qualified means to spray water into the spent fuel pools, including an easily accessible connection to supply the water (e.g., using a portable pump or pumper truck) at grade outside the building.	Meets intent: EA-12-049 uses a spray strategy (in guidance) and two access locations for providing makeup to the spent fuel pool	The rule would incorporate EA-12-049 (guidance) strategies that include a spray strategy and two access locations for providing makeup to the spent fuel pool
7.5 Initiate rulemaking or licensing activities or both to require the actions related to the spent fuel pool described in detailed recommendations 7.1–7.4.	Not applicable	Not needed since the suggested rulemaking is more efficiently addressed by being integrated into the station blackout mitigation strategies rulemaking

*Original Scope of Order as envisioned by the NTTF prior to consideration of feedback from public interactions