

February 19, 2013

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

FROM: G. Edward Miller, Project Manager /RA/
Projects Management Branch
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF FEBRUARY 11, 2013, PUBLIC MEETING ON
IMPLEMENTATION OF NEAR-TERM TASK FORCE
RECOMMENDATION 2.1, FLOODING HAZARD REANALYSIS,
RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER
PLANT ACCIDENT

On February 11, 2013, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting¹ with the Nuclear Energy Institute (NEI) and other industry representatives. The purpose of the meeting was to discuss how to address flooding hazard reanalysis, which is part of Recommendation 2.1 from "Recommendations for enhancing Reactor Safety in the 21st Century," a report issued by the post-Fukushima Near-Term Task Force (NTTF) on July 12, 2012.² On March 12, 2012, the NRC issued an information request pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) to implement this recommendation.³

The meeting began with a discussion with NEI on the topic of the reevaluated flooding hazards, their potential impact on structure, system, and component (SSC) operability, and the potential for reportability pursuant to 10 CFR 50.72. To support the discussion, NEI provided a draft white paper discussing the issue.⁴ The NRC staff concurred that the flood hazard reevaluations being performed pursuant to the 50.54(f) letter is beyond the current design/licensing basis of a plant, and that the results of the analysis done using present-day regulatory guidance, methodologies, and information would not likely affect operability for SSCs. An extension of this consideration would be that the results of the analysis are not likely to be reportable pursuant to 10 CFR 50.72 and 10 CFR 50.73. The NRC staff did reinforce, though, and as with all situations that may arise at a plant, licensees are responsible for evaluating and making these determinations through licensee corrective action programs.

The NRC staff also noted if a licensee were to identify a non-conservatism or error in the current design/licensing basis during the performance of the requested analysis, there would be an effect on operability of SSCs. Additionally this situation is likely to be reportable pursuant to 10 CFR 50.72 and 50.73.

¹ The original meeting notice is available via the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML13031A246.

² The NTTF report is available under ADAMS Accession No. ML111861807.

³ The 50.54(f) letter is available under ADAMS Accession No. ML12053A340.

⁴ The NEI draft white paper is available under ADAMS Accession No. ML13044A697.

The NRC staff discussed how it would review the interim actions that were requested to be submitted along with any hazard reports that were not bounded by the current design basis. The NRC staff indicated that it intended to leverage, in a limited fashion, the existing guidance (e.g., NEI 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features," and JLD-ISG-2012-05, "Guidelines for Performing the Integrated Assessment for External Flooding." Additionally, the staff indicated that this assessment would be made publically available.

The NRC staff discussed what information should be submitted in the event a licensee needed to request an extension to the hazard report due-date. The staff indicated that licensees should include (1) the reason for the delay; (2) the proposed new due-date for the hazard report; and (3) and the basis for the acceptability of the revised schedule. Additionally, the staff indicated its preference to only receive complete hazard reports or complete extension requests.

The NRC staff discussed questions (FAQs) that had recently been submitted by NEI.⁵ For FAQ 8, the staff was generally in agreement with the resolution with the exception of referring to the integrated assessment under scenarios 2 and 3 as "lite" and requested that NEI provide a revised version. For FAQ 9, the staff had no objections to the first sentence of the resolution, but requested that the second sentence be deleted and that NEI resubmit the FAQ. Following discussion of FAQ 17, it was identified that additional discussion at a later public meeting would be necessary. FAQs 11 and 13 were not discussed at this meeting.

In addition to the FAQs, NEI had provided two additional questions for discussion.⁶ These related to the consideration of debris loading in the hazard report and inclusion in the integrated assessment. After discussion of the topic, it was agreed that NEI would submit FAQs on these topics as well.

Enclosure:
Lists of Attendees

⁵ The FAQs submitted by NEI are available under ADAMS Accession No. ML13044A692.

⁶ The additional questions submitted by NEI are available under ADAMS Accession No. ML13044A693.

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