

May 2, 2013

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

FROM: Jessica A. Kratchman, Project Manager **/RA/**
Projects Management Branch
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF APRIL 18, 2013, PUBLIC MEETING TO
DISCUSS ORDER EA-12-049, MITIGATION STRATEGIES

On March 4, 2013, the U.S. Nuclear Regulatory Commission (NRC) held a Category 2 public meeting with industry representatives and members of the public to discuss the review of integrated plan submittals, which are a requirement of Order EA-12-049, *Mitigating Strategies for Beyond-Design-Basis Events*, issued on March 12, 2012. Per the requirements of the Order, licensees must have submitted overall integrated plans by February 28, 2013. The purpose of this meeting was to discuss generic issues associated with the review of integrated plan submittals. Further, Nuclear Energy Institute (NEI) sought NRC feedback on a frequently asked question (FAQ) they identified, and a template they developed for use in the next 6-month status update.

The generic issues that the NRC staff communicated are technical concerns that were identified during the initial NRC review of integrated plans. Several of the potential generic technical concerns focus on analysis methods and assumptions used by licensees to support their purposed implementation of Mitigation Strategies, including:

- Industry use of CENTS (Nuclear Transient Simulation Code) given the programs capabilities;
- Sub-cooling analysis considerations;
- Boron mixing models;
- Acceptability of the Modular Accident Analysis Program (MAAP) code for boiling water reactor analyses; and,
- Justification of battery duty cycle assumptions longer than eight hours.

The NRC staff also noted potential concerns regarding adequate licensee identification of strategies for shutdown/refueling modes and licensee reliance on the Electric Power Research Institute preventive maintenance and testing process, which is not complete or endorsed, for FLEX equipment.

CONTACT: Jessica A. Kratchman, NRR/JLD
301-415-5112

Industry staff acknowledged the majority of the NRC-identified potential generic concerns but requested further dialogue on a few items. This included the use of MAAP and battery duty cycle assumptions. They also expressed concern regarding the inclusion of early venting strategies. The NRC staff expressed interest in further dialogue on these issues as well.

Industry staff then presented templates for their six-month status report submissions. They inquired as to acceptability of identifying potential safety evaluation impacts and relief requests in their submissions, to which NRC staff noted that they should still follow existing processes for such cases. Lastly, industry staff provided a discussion on what they believe to be acceptable examples of "reasonable protection" to clarify NEI 12-06, Section 7 on N+1 equipment requirements to meet FLEX guidelines. There was no disagreement by the NRC staff with the industry examples.

Enclosure:
List of Attendees

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Enclosure:
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**NRC PUBLIC MEETING TO DISCUSS IMPLEMENTATION OF JAPAN
LESSONS-LEARNED PROJECT DIRECTORATE ORDER EA-12-049, MITIGATING
STRATEGIES**

04-18-2013

9:00 a.m. - 12:00 p.m.

Name	Organization
Jessica Kratchman	NRC/NRR/JLD –Project Manager
Handy Burt	SNC/BWRROG
Kurt F. Flaig	Dominion/PWROG
WILLIAM WEBSTER	DOMINION/NEI
Roy Brosi	FIRSTENERGY/NEI
DAVID Schupp	ENERCON
Byron Ford	Entergy
David K. White	AREVA
Clifton Buck	Southern Nuclear
Ronnie Lingle	NextEra Energy
MICHAEL POWELL	ARIZONA PUBLIC SERVICE COMPANY
Steven KRAFT	NEI
Bill Chenault	ENERCON
Jana Bergman	Sciencetech/CWFC
John M. King	NRC/NRO
Nageswara Kasipineni	NRC/NRR/DSS/SCVB
Jerome Bettel	NRC/NRR/DSS/SCVB
EDIE POWMAN	NRC/NRR/DSS/SCVB
DIANA WOODYATT	NRC/NRR/DSS/SRXB

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