

PUBLIC SUBMISSION

As of: August 12, 2014 Received: August 11, 2014 Status: Pending_Post Tracking No. 1jy-8dql-ifta Comments Due: August 21, 2014 Submission Type: Web
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Docket: NRC-2008-0332
Performance-Based ECCS Cladding Acceptance Criteria

Comment On: NRC-2008-0332-0060
Performance-Based Emergency Core Cooling Systems Cladding Acceptance Criteria

Document: NRC-2008-0332-DRAFT-0088
Comment on FR Doc # 2014-05562

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General Comment

Proposed Draft Rule, ACRS and PRM-50-84

Comment is attached.

Attachments

Proposed Draft Rule, ACRS and PRM-50-84

Proposed Draft Rule, ACRS and PRM-50-84

This comment focuses on interactions between the NRC staff and ACRS. The ACRS has not sufficiently addressed PRM-50-84. The draft rule lists a multitude of interactions with the ACRS including:

December 15, 2011	Subcommittee Meeting	ML120100268
January 19, 2012	Full Committee Meeting	ML12032A048
January 26, 2012	Letter from ACRS to NRC Staff	ML12023A089
February 17, 2012	Response Letter from NRC staff to ACRS	ML120260893

The February 17, 2012, Response Letter, ML120260893, includes:

“The ACRS letter commended the staff and industry contributors for their systematic and thorough work on the emergency core cooling system safety performance assessment and audit. We are pleased with your positive feedback on these items.”

In fact, the NRC staff and ACRS have not been systematic and thorough in their deliberations regarding PRM-50-84. Following are excerpts from the relevant subcommittee meeting, December 15, 2011, ML120100268.

Tara Inverso referred to PRM-50-84:

“The second Petition for Rulemaking that's addressed is PRM-50-84, and that one was submitted by Mr. Mark Lacey on March 15th 25 of 2007, and requested rulemaking in a couple of areas, one of which was that the NRC consider the effects of the thermal resistance of crud and oxide layers in their analyses.”

The Tara Inverso Slide 4 in the subcommittee meeting, December 15, 2011, is titled: **Rulemaking Purpose** and it includes:

- Address concerns raised in two PRMs: PRM-50-71 and PRM-50-84

Later in the meeting Member Shack observed that Mark Leyse's PRM-50-84 was going to be addressed in the new rule but he “... missed it.” Following is copied from the ACRS subcommittee meeting, December 15, 2011:

MEMBER SHACK: There was a statement that the new rule was going to address Mr. Lacey's petition, and I haven't seen anything that really does that. Is it something in the Statement of Considerations?

MR. CLIFFORD: There was an analytical requirement added to the rule itself that said the effects of crud have to be accounted for.

MEMBER SHACK: I missed it. I missed it.

MR. CLIFFORD: So, any new LOCA model we review they would have to say how are they accounting for crud.

MEMBER SHACK: I missed it.

Member Shack “missed it” because PRM-50-84 was not addressed in the subcommittee meeting. Following brief and irrelevant observations the Chairman dismissed further discussions of PRM-50-84 as follows:

CHAIR ARMIJO: Yes. Yes. Is that it?

Next, at Full ACRS, January 19, 2012, and Tara Inverso reported that Mark Leyse submitted a PRM:

And then, a second PRM was from March of 2007. It was submitted by Mr. Mark Lasey and requested rulemaking in a few areas, one of which was the consideration of thermal resistance of crud in the LOCA analyses.

However, there was no further discussion of PRM-50-84.