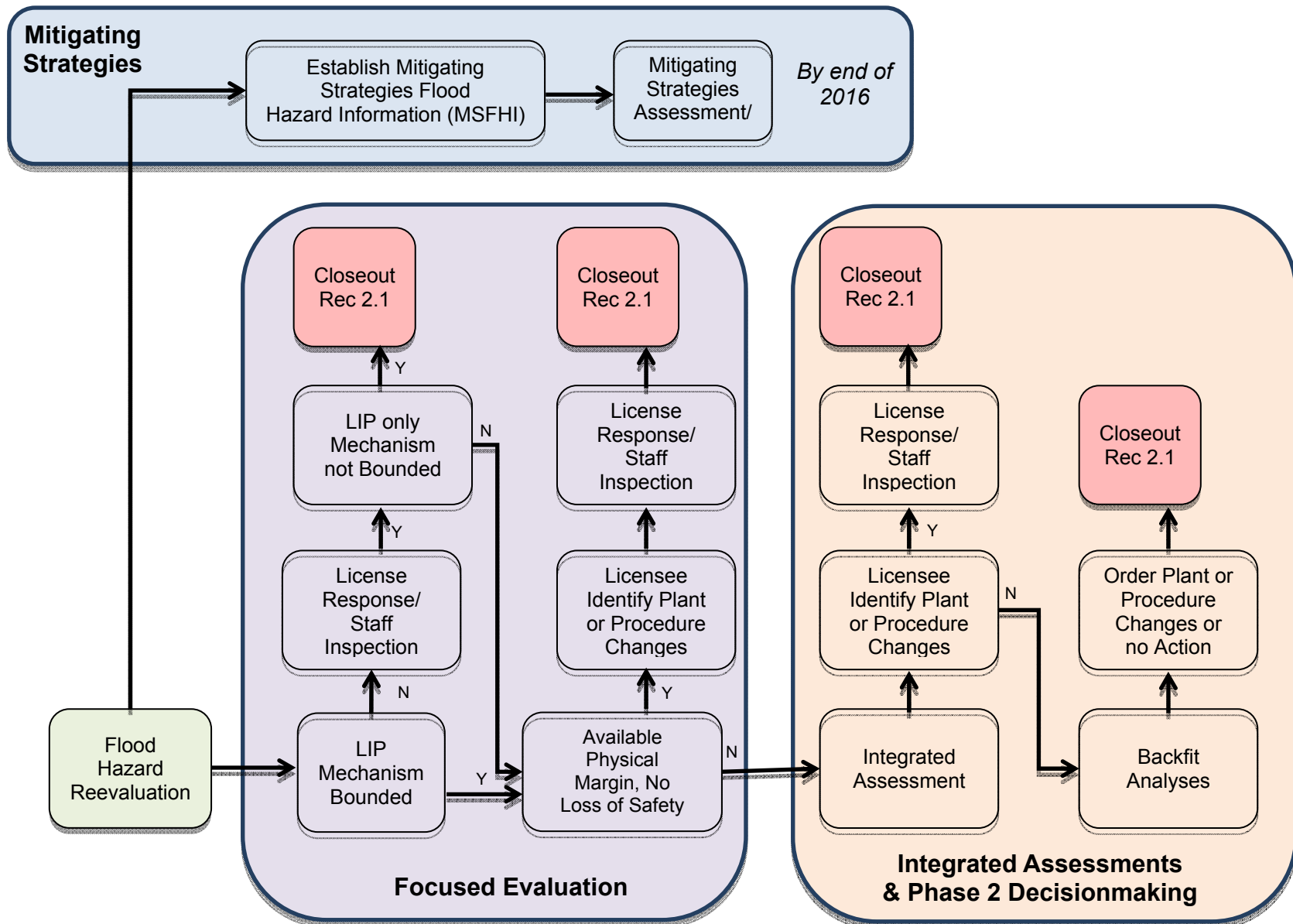


Recommendation 2.1 – Proposed Flooding Closure Plan



This graphic shows the staff's proposal for how Recommendation 2.1—Flooding should inform the evaluation of mitigating strategies and also should be closed out. It shows that there are two major paths: 1) evaluation of mitigating strategies and 2) focused evaluation/integrated assessments. Licensees need to proceed down both of these paths.

The NRC is conducting the reviews of the licensees' flood hazard reevaluation reports. The NRC will be issuing a staff assessment stating whether or not the NRC agrees that the reevaluated hazards are acceptable. That is a methodical review. In order to expedite the evaluation of mitigating strategies against the reevaluated hazard, the NRC will issue interim letters in the near term to inform licensees whether their reevaluated hazard can be used to conduct that evaluation.

The licensees will be taking their reevaluated hazard information, determining whether the mitigating strategies work under those conditions, and making any appropriate adjustments. For example, if a pump that is needed for the mitigating strategies would be flooded in its current location given the new possible flood level, then the licensee will assess how the strategy should be modified (for example, through protection or relocation of the pump). These assessments and adjustments would be substantially complete by 2016.

Simultaneously, licensees will be working on either a focused evaluation or an integrated assessment of the plant protection capabilities, depending on how they respond to the following screening criteria:

- compare the new local intense precipitation level to the licensing basis level
- consider if the plant has available physical margin (for example, if the licensing basis is three feet and the existing wall is physically four feet, then it has available physical margin to handle a new level up to four feet)
- consider if the higher flooding levels would cause a loss of safety function, such as core cooling, spent fuel pool cooling, or containment

If the plant's reevaluated local intense precipitation level is found to be greater than previously considered, but all the other possible flooding sources are less than or equal to the current design basis, then the licensee would not have to perform an integrated assessment. Similarly, even if the other possible flooding sources lead to higher levels than before, if the licensee has available physical margin and no loss of safety function would occur, the licensee would not have to perform an integrated assessment. Instead of an integrated assessment, the licensee would respond to the NRC and include, if necessary, any plant or procedure changes to address the flood level increases. The NRC would then review and inspect these. This would close out the review.

The remainder of the plants would need to perform an integrated assessment. This assessment would be used to identify any changes needed to protect the plant from the new hazard. The NRC will decide the appropriate course of action to protect the plant including voluntary actions by the licensee or an order to the plant to make the changes, if necessary to protect public health and safety and the environment. This is referred to as Phase 2 evaluation. If no action is needed, then the review is considered closed.