

## **Enclosure 1**

**MFN 15-044**

### **GEH Response to Item #17**

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**NRC- Suggested Design Changes Item #17 – Emergency Operating Procedures**

*Update emergency procedure guidelines and severe accident management guidelines consistent with NEI 91-04.*

**GEH Response:**

GEH will amend ABWR DCD Tier 2, Sections 13.5.3.2 and 13.5.4 to reference NEI 91-04. In addition, NEI 06-12, NEI 14-01 and SECY-11-0124 have been added as references. The current revision of the ABWR DCD contains the Emergency Operating Procedures (EOPs) and the new references will provide guidance to the plant operator on the development of the additional post accident guidelines used by the industry:

- Severe Accident Management Guidelines (SAMGs),
- Extensive Damage Mitigation Guidelines (EDMGs),
- FLEX Support Guidelines (FSGs) and
- Plant Specific Technical Guidelines (PSTGs).

The following text will be added to the next revision of the ABWR DCD Tier 2, Section 13.5.3.2:

- The procedure development will integrate the Emergency Operating Procedures (EOPs), Severe Accident Management Guidelines (SAMGs), FLEX Support Guidelines (FSGs) and Extensive Damage Mitigation Guidelines (EDMGs) by using the following guidance:
  - Industry (BWROG) guidance as endorsed by applicable NRC regulatory guides consistent with the Task Force recommendation as described in SECY-11-0124 (Reference 13.5-9).
  - Plant Specific Technical Guidelines (PSTGs), EOPs and SAMGs development activities using as inputs the standard ABWR guidelines (DCD) and generic industry guidance per NEI 91-04, Revision 1, Severe Accident Issue Closure Guidelines (Reference 13.5-10), which includes the industry commitment to incorporate severe accident strategies into the overall accident management program.
  - EDMGs development as described in NEI 06-12, Reference 13.5-11.
  - FSGs development as described in NEI 12-06, Reference 13.5-12.
  - The EOPs, EDMGs, FSGs and SAMGs will be integrated in a cohesive, effective and useable manner as described in NEI 14-01, Emergency Response

Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents (Reference 13.5-13).

The four new documents referenced will be added to both Section 13.5.4 and to the appropriate Tables in Section 1.8 (Tables 1.8-21 and 1.8-22).

**Impact on DCD:**

The DCD Tier 2 Tables 1.8-21 and 1-8-22, and Sections 13.5.3.2 and 13.5.4, are being revised. The ABWR DCD R5 marked up pages are provided in Enclosure 2.