

NRC Conceptual Comments on Chapter 3 Rulemaking Proposal  
For July 1, 2015, Public Meeting with Industry Stakeholders

1. The staff would appreciate more details regarding examples of specific postulated applications of the proposal that would require deviation from Chapter 3.
  - In particular, it is not clear what would constitute a performance-based alternative for some Chapter 3 sections. Some examples of these sections include 3.3.1.1.(1), 3.3.1.3.3, 3.8.1.1, and 3.10.10.
2. The staff would also like to better understand why certain currently performance-based sections of Chapter 3 are included in the proposal. For example Section 3.3.9 – Transformers is largely performance-based.
3. The staff would like to hear from the industry if there are concerns with using performance-based tools to demonstrate compliance with the deterministic criteria in Chapter 3.
4. Why are Sections 3.8 – 3.11 included in the proposal? They already have an “adequate for the hazard” provision in the license condition.
5. Does the industry envision that some Chapter 3 sections would have different standards to be met? For example, would the same analysis be required for features specifically discussed in the safety evaluation, whether they were included in the PRA, etc.