

# PUBLIC SUBMISSION

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Alternate Risk-Informed Approach for Addressing the Effects of Debris on Post-Accident Long-Term Core Cooling

**Comment On:** NRC-2015-0095-0001

Alternate Risk-Informed Approach for Addressing the Effects of Debris on Post-Accident Long-Term Core Cooling; Draft Regulatory Guide for Comment

**Document:** NRC-2015-0095-DRAFT-0005

Comment on FR Doc # 2015-08964

4/20/2015  
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## Submitter Information

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RULES AND DIRECTIONS  
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10/15/15

## General Comment

See attached file(s)

## Attachments

STARS-15005 Letter

STARS-15005 Attachment

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03

Add= S. A. Larr (Gal)

S. Pyntov (SXB3)

# STARS Alliance

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Callaway Energy Center  
Diablo Canyon Power Plant  
Palo Verde Nuclear Generating Station  
Wolf Creek Generating Station

STARS-15005

July 2, 2015

Ms. Cindy Bladey  
Office of Administration  
Mail Stop: OWFN-12H08  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: STARS Alliance LLC Comments on NRC Draft Regulatory Guide (DG) DG-1322, "Alternate Risk-Informed Approach for Addressing the Effects of Debris On Post-Accident Long-Term Core Cooling," dated April, 2015 (Docket ID NRC-2015-0095)

References: 1. Federal Register Notice Volume 80, No. 75 (80FR21658), dated April 20, 2015, Docket ID NRC-2015-0095  
2. Letter from STP Nuclear Operating Company to Cindy Bladey, U.S. Nuclear Regulatory Commission, Office of Administration, "South Texas Project Units 1 and 2, Comments on Draft Regulatory Guide DG-1322 - Risk-Informed Approach for Addressing the Effects of Debris On Post-Accident Long-Term Core Cooling, Docket ID NRC-2015-0095-0002," dated June 24, 2015

Dear Ms. Bladey:

As noted in Reference 1, the Nuclear Regulatory Commission (NRC) issued for public comment NRC Draft Regulatory Guide (DG) DG-1322, "Risk-Informed Approach for Addressing the Effects of Debris On Post-Accident Long-Term Core Cooling," Docket ID NRC-2015-0095. STARS Alliance LLC (STARS) appreciates the opportunity to comment on this document.

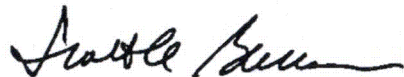
STARS endorses the comments submitted by STP Nuclear Operating Company in Reference 2. STARS submits the items in the attachment to this letter as additional comments.

STARS-15005

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If you have any questions, please contact me at 623-239-4359, or [scott.bauer@starsalliance.com](mailto:scott.bauer@starsalliance.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Scott A. Bauer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Scott A. Bauer

Regulatory Affairs Functional Area Manager

Attachment



July 2, 2015

DG-1322, April 2015 Draft Regulatory Guide Paragraph Number	Comments
Paragraph C.1	The guidance should limit the operating mode of concern to at-power events, consistent with the full power (plus 2%) Appendix K models used to run LBLOCA and SBLOCA analyses. There should be no need to require a low-power or shutdown PRA model.
Paragraph C.4.f	It is unclear how the examples in C.4.f (e.g., strainer blockage, in-vessel effects, and ex-vessel downstream effects) relate to the requirement that licensees utilize integrated models to evaluate strainer and downstream system performance including effects of safety-related and non-safety related system activation. It would be clearer to provide examples of system actuations (e.g., automatic suction swap-over, initiation of containment spray, etc.).
Paragraph C.5	The guidance should limit the operating mode of concern to at-power events, consistent with the full power (plus 2%) Appendix K models used to run LBLOCA and SBLOCA analyses. There should be no need to require a low-power or shutdown PRA model.
Paragraph C.6.c	Clarify that the effects of latent debris may be neglected when testing demonstrates no impact on strainer performance.
Paragraph C.8	Paragraph C.8 is worded in a way that implies the need for conservatism in evaluating containment pressure. Consider rewording this paragraph to emphasize realistic modeling. The last sentence should be revised to state that licensees should use realistic, sequence-specific containment pressures in NPSH computations. The basis for the containment pressure used in NPSH calculations should be clearly documented.
Paragraph C.9	<p>Paragraph C.9 allows the user to skip steps C.10 through C.13 but paragraph C.9.a refers the user to paragraphs C.11 and C.13. It is recommended that the reference to paragraphs C.11 and C.13 in paragraph C.9.a. be deleted.</p> <p>Alternately, instead of referencing C.11 and C.13, provide guidance that the simplified approach uses values that bound all scenarios (demonstrated through testing) for chemical effects and debris strainer penetration downstream effects.</p>
Paragraph C.13.f	The end of the sentence is, "and analogies of ." Complete the sentence to indicate the scope of acceptable bases for the penetrated debris effects model.
Paragraphs C.14 and C.15	These sections presume that licensees modify existing PRA models to incorporate the results of the risk informed modelling. If $\Delta CDF$ and $\Delta LERF$ can be calculated independent of the existing PRA model, then it should not be required to modify the existing model.

July 2, 2015

Paragraph C.14.d.1	Consider rewording paragraph C.14.d.1 as the term HELB has a very specific definition as a Hazard Event which is beyond the scope of DBA mitigation requirements.
Paragraph C.18	This paragraph indicates that parameter values should be consistent with licensing basis calculations, which are inherently conservative. This should be revised to state that realistic parameters should be used and clearly documented.
Paragraph C.19	Paragraph C.19 needs to be re-worded to be consistent with the guidance in RG 1.174 regarding quality program requirements associated with aspects of the risk assessment.
Paragraph C.20	This paragraph refers to an implementation and monitoring program. If the NRC intent is that the design change process be followed for NRC approved inputs to the PRA model, this paragraph should state that requirement. There is no need for an implementation and monitoring program to ensure configuration control in containment.
References	Add, "Generic Safety Issue (GSI)-191, Assessment of Debris Accumulation on PWR Sump Performance," which is discussed in Section B on page 3.