

## RESPONSE SHEET

**TO:** Annette Vietti-Cook, Secretary

**FROM:** Chairman Burns

**SUBJECT:** COMSECY-15-0019: CLOSURE PLAN FOR THE  
REEVALUATION OF FLOODING HAZARDS FOR  
OPERATING NUCLEAR POWER PLANTS

Approved   X   Disapproved        Abstain        Not Participating       

**COMMENTS:** Below   X   Attached        None       

I approve the Mitigating Strategies and Flooding Hazard Reevaluation Action Plan presented in COMSECY-15-0019. I appreciate the staff's timely response to the Commission direction in the staff requirements memorandum (SRM) for COMSECY-14-0037, "Integration of Mitigating Strategies for Beyond-Design-Basis External Events and the Reevaluation of Flooding Hazards." I agree with Commissioner Ostendorff that the quantitative risk criteria discussed in the COMSECY should be considered preliminary at this stage in light of future planned interactions with external stakeholders and the ACRS. I also support his proposal for staff to provide the guidance for integrated assessments and associated regulatory decisionmaking to the Commission for information prior to implementation. Given the significant external attention that flooding issues and close-out of Fukushima lessons learned have received, the staff should work with the Office of Public Affairs and the Office of Congressional Affairs to develop an effective communication plan for the issues addressed in COMSECY-15-0019.

### Entered in STARS

Yes   x  

No       



Signature

10 July 2015

Date

**RESPONSE SHEET**

**TO:** Annette Vietti-Cook, Secretary

**FROM:** COMMISSIONER SVINICKI

**SUBJECT:** COMSECY-15-0019: CLOSURE PLAN FOR THE  
REEVALUATION OF FLOODING HAZARDS FOR  
OPERATING NUCLEAR POWER PLANTS

Approved XX Disapproved \_\_\_\_\_ Abstain \_\_\_\_\_ Not Participating \_\_\_\_\_

COMMENTS: Below XX Attached \_\_\_\_\_ None \_\_\_\_\_

In light of the Commission majority's rejection of the staff's earlier recommendation, in COMSECY-14-0037, to integrate the Phase 2 decision-making on the flooding hazard reassessments into the development and implementation of the ongoing, related rulemaking for mitigation of beyond-design-basis events, I agree that the staff's enclosed draft "Mitigating Strategies and Flooding Hazard Reevaluation Action Plan" is a reasonable approach for addressing the majority's direction. I approve the draft plan on that basis.

  
\_\_\_\_\_  
SIGNATURE

07/ 20 /15  
\_\_\_\_\_  
DATE

Entered in "STARS" Yes ✓ No \_\_\_\_\_

## RESPONSE SHEET

**TO:** Annette Vietti-Cook, Secretary

**FROM:** COMMISSIONER OSTENDORFF

**SUBJECT:** COMSECY-15-0019: CLOSURE PLAN FOR THE  
REEVALUATION OF FLOODING HAZARDS FOR  
OPERATING NUCLEAR POWER PLANTS

Approved XX Disapproved \_\_\_\_\_ Abstain \_\_\_\_\_ Not Participating \_\_\_\_\_

COMMENTS: Below XX Attached \_\_\_\_\_ None \_\_\_\_\_

I approve the mitigating strategies and flooding hazard reevaluation action plan provided by the staff in COMSECY-15-0019. I commend the staff for their thorough and thoughtful response to the Commission's direction in SRM-COMSECY-14-0037. Timely and effective implementation of this plan is of utmost importance to support implementation of the proposed mitigation of beyond design basis events rule and to bring expeditious closure to the flooding hazard reevaluations. The staff should continue to look for additional opportunities to address any over conservatism in these evaluations and to streamline the process as additional lessons are learned. As discussed in the COMSECY, the staff plans interactions with stakeholders, including the public, industry and the Advisory Committee on Reactor Safeguards (ACRS) as guidance is developed for integrated assessments and associated regulatory decisionmaking. As such, the quantitative risk criteria discussed in the COMSECY should be considered preliminary at this stage. The staff should keep the Commission informed of the progress on implementation of the mitigating strategies and flooding hazard reevaluation action plan and should raise any additional policy issues that may be identified to the Commission promptly for resolution. The staff should also provide the guidance for integrated assessments and associated regulatory decisionmaking to the Commission for information prior to implementation.

Entered in STARS

Yes \_\_\_\_\_

No \_\_\_\_\_

  
\_\_\_\_\_  
Signature

7/7/15  
\_\_\_\_\_  
Date



## RESPONSE SHEET

**TO:** Annette Vietti-Cook, Secretary

**FROM:** Commissioner Baran

**SUBJECT:** COMSECY-15-0019: CLOSURE PLAN FOR THE  
REEVALUATION OF FLOODING HAZARDS FOR  
OPERATING NUCLEAR POWER PLANTS

Approved  X  Disapproved   Abstain   Not Participating

COMMENTS: Below  X  Attached   None

I approve the NRC staff's "Mitigating Strategies and Flooding Hazard Reevaluation Action Plan." I appreciate the NRR and NRO staffs' collaboration in providing a timely and thoughtful response to the Commission's direction to develop a path forward on flooding hazard reevaluations, integrated assessments, and determinations about the need for additional regulatory actions. The plan provides for the implementation of mitigating strategies requirements by December 2016 at most sites. It also contemplates a graded approach that will focus integrated assessments on those plants where there is the greatest potential need for safety enhancements.

Given the large uncertainties associated with low frequency flooding events and the staff's planned efforts to seek input from external stakeholders and the Advisory Committee on Reactor Safeguards, I agree with Chairman Burns and Commissioner Ostendorff that the quantitative risk criteria should be considered preliminary at this stage. I also join Chairman Burns in supporting Commissioner Ostendorff's proposal that the staff provide the final guidance on revised integrated assessments and Phase 2 regulatory evaluations to the Commission for information prior to their use.

I commend the staff for providing the Commission with detailed, periodic updates on the status of flooding hazard reevaluations and integrated assessments. I look forward to continued updates during implementation of this action plan and guidance development.

### Entered in STARS

Yes  x

No

  
Signature

7/17/16  
Date