

## EMERGENCY PREPAREDNESS FREQUENTLY ASKED QUESTION (EPFAQ)

**EPFAQ Number:** 2015-014

**Date Accepted for Review:** 09-Oct-15

**Originator:** DON JOHNSON

**Organization:** NUCLEAR REGULATORY COMMISSION

**Relevant Guidance:** NEI 99-01 REV. 6

**Applicable Section(s):** EAL HS6

**Status:** Public Comment Period

### QUESTION OR COMMENT:

Should consideration be given to allow for specifying relevant operating modes for the key safety functions listed in this EAL [Emergency Action Level]?

### PROPOSED SOLUTION:

The industry agrees that consideration be given to allow for specifying relevant operating modes for the key safety functions as listed in Initiating Condition HS6. The following recommended approach is provided for staff consideration for both boiling water reactor (BWR) and pressurized water reactor (PWR) operating modes:

| Key Safety Function  | BWR Operating Mode  | PWR Operating Mode |
|--|---------------------|--------------------|
| Reactivity Control   | 1 and 2             | 1, 2 and 3         |
| Core Cooling (PWR) /<br>Reactor Pressure Vessel<br>Water Level (BWR) | All except defueled |                    |
| RCS Heat Removal   |                     |                    |

Following the selection of a solution by the staff, the industry would like to have an opportunity to provide input on recommended Basis and Developer Note information to be included in the final EPFAQ as these are important for consistent implementation. We anticipate providing this input during the public comment period.

Consistent with the guidance in Regulatory Issue Summary (RIS) 2003-18, Supplement 2, *Use of Nuclear Energy Institute (NEI) 99-01, "Methodology for Development of Emergency Action Levels", Revision 4*, dated January 2003, it is reasonable to conclude that the change proposed above would be considered as a "deviation."

### NRC RESPONSE:

The staff agrees with this proposed solution.

This is considered a "deviation" in accordance with Regulatory Issue Summary (RIS) 2003-18, Supplement 2, *"Use of Nuclear Energy Institute (NEI) 99-01, Methodology for Development of Emergency Action Levels, Revision 4,"* dated January 2003.