

**EPFAQ Number:** 2015-015

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

**Originator:** DON JOHNSON

**Organization:** NUCLEAR REGULATORY COMMISSION

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

**Applicable Section(s):** ICs SA1, SS1, SG1, CU2, & CA2

**Status:** Public Comment Period

**QUESTION OR COMMENT:**

Should Initiating Conditions (ICs) SA1 and CU2 contain a list of power sources applicable for consideration and describe the criteria for what sources may be credited? In addition, should guidance be included to explain why a list of sources is not necessary for ICs SS1 (CA2) and SG1 as these EALs [Emergency Action Levels] are for a loss of ALL sources?

**PROPOSED SOLUTION:**

The industry has no objection to including a list of applicable power sources in ICs SA1 and CU2, and not including a similar list in ICs SS1, CA2 and SG1. It appears that the proposed approach would also apply to IC SG8.

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 EP FAQ 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 "difference."

**NRC RESPONSE:**

The staff agrees that a table listing available power sources is acceptable and expected for ICs CU2 and SA1 from NEI 99-01, Revision 6, as long as these power sources are:

- Adequately maintained in an appropriate maintenance program; and
- Are able to assume the full load of the (applicable) emergency buses within approximately 15-minutes.

The staff understands that the primary point of emphasis for ICs CA2, SS1, SG1 and SG8 is a complete loss of power (for the applicable time duration) and that a list of readily available power sources may lead to event declarations when mitigation strategies are effective in reestablishing emergency power to these buses. In other words, if a list of power sources is provided for these EALs, and those sources are unavailable, then an EAL decision-maker would be compelled to declare events even if mitigation strategies using other power sources are effective. It is not necessary to document these power sources for these EALs as the EAL is not concerned with the power source as much as the power loss to the emergency bus.

In summary, the staff only considers ICs SA1 and CU2, as numbered in NEI 99-01 Revision 6, as needing a table of readily available onsite AC power sources. IC SU1 may list the offsite AC power sources if desired. ICs CA2, SS1, SG1, and SG8 do not need to list the sources.

Based on the staff's evaluation, 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.