

April 10, 2014

John W. Stetkar, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: PROPOSED RULEMAKING ON STATION BLACKOUT MITIGATION
STRATEGIES

Dear Mr. Stetkar:

I am responding to your February 12, 2014, letter in which the Advisory Committee on Reactor Safeguards (ACRS or Committee) expressed concern regarding the proposed station blackout mitigating strategies rulemaking and the possible failure of decay-heat removal capability as an independent or common-cause event. You also noted that the ACRS first provided this concern to the U.S. Nuclear Regulatory Commission (NRC) staff on June 17, 2013, in a letter from Dr. J. Sam Armijo (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13161A247), which (in Recommendation 5) stated:

Failure of decay heat removal capability as an independent or common cause event is not within the scope of the mitigating strategies order or the proposed mitigation strategies rule. An increase in scope to include loss of decay heat removal as a separate condition and not just as a consequence of extended loss of ac [alternating current] power should be considered as part of the staff efforts on Near Term Task Force (NTTF) Recommendation 1 and the Risk Management Task Force (RMTF) program development.

On August 1, 2013, the NRC staff responded and provided its rationale for not reopening the decay heat removal issue. The NRC staff continues to believe that appropriate measures are in place to address loss of decay heat removal. This position is outlined in NUREG/CR-6832 and recent post-Fukushima actions serve to further justify it.

The NRC staff provided the Commission with its recommendations for activities to undertake in response to NTTF Recommendation 1 on December 6, 2013, in SECY-13-0132, "U.S. Nuclear Regulatory Commission Staff Recommendation for the Disposition of Recommendation 1 of the Near-Term Task Force Report," and did not include further consideration of the loss of the decay heat removal function. The staff believes that the regulatory framework recommendations in NTTF Recommendation 1 and the RMTF report were not intended to invite reconsideration of specific technical issues that are not directly related to, or identified by, proposed changes to the NRC's regulatory framework. SECY-13-0132 is now before the Commission for a decision. Commission direction on SECY-13-0132 will inform the staff's recommended approach for implementing the Risk Management Regulatory Framework (RMRF).

J. Stetkar

- 2 -

The NRC staff will continue to meet with the ACRS while developing its RMRF recommendations and is willing to discuss how any proposed regulatory framework changes under the RMRF might impact specific technical issues of interest to the Committee. The staff appreciates the comments and recommendations provided by ACRS and looks forward to continuing to work with the Committee in the future.

Sincerely,

/RA/

Mark A. Satorius
Executive Director
for Operations

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
SECY

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