



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, DC 20555 - 0001**

September 19, 2016

Mr. Victor M. McCree
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**SUBJECT: RESPONSE TO THE JULY 5, 2016 STAFF LETTER REGARDING INTERIM
 STAFF GUIDANCE JLD-ISG-2016-01 FOR FOCUSED EVALUATIONS AND
 INTEGRATED ASSESSMENTS OF REEVALUATED FLOODING HAZARDS**

Dear Mr. McCree:

During the 636th meeting of the Advisory Committee on Reactor Safeguards (ACRS), September 8-10, 2016, we reviewed your July 5, 2016 letter regarding disposition of the conclusions and recommendations in our referenced letter of May 18, 2016.

We understand the staff's responses and the discussion of constraints that are implied by the Staff Requirements Memorandum to COMSECY-15-0019. We also recognize that licensees are in the process of performing their focused evaluations and integrated assessments according to the framework that is outlined in COMSECY-15-0019 and JLD-ISG-2016-01, Revision 0. Further elaboration or refinements to staff guidance could jeopardize timely completion of those evaluations in a consistent manner for all affected sites.

We acknowledge that judicious use of operating experience and engineering judgment will be needed during the staff's reviews of the licensee submittals. To better understand how the site-specific evaluations are performed in practice and the staff's considerations during their reviews, we would appreciate briefings on the staff's reviews of:

- Two or three sites that perform Path 3 focused evaluations of local intense precipitation and for which key equipment is not effectively protected against the flood (i.e., which require additional considerations to mitigate the flooding damage). To better understand the Path 3 evaluations and their reviews, it is preferable that these sites do not need a Path 4 or Path 5 integrated assessment for other flooding mechanisms.
- Two or three sites that perform a Path 4 or Path 5 integrated assessment. At least one of those sites should include a Path 5 scenario-based evaluation.
- At least one site with a targeted hazard mitigating strategy that does not maintain all three intended plant safety functions (i.e., core cooling, containment, and spent fuel cooling).

We look forward to our continuing interactions to achieve successful closure of this element of Near-Term Task Force Recommendation 2.1.

Sincerely,

/RA/

Dennis C. Bley
Chairman

REFERENCES

1. U.S. Nuclear Regulatory Commission, "Response to the Advisory Committee on Reactor Safeguards Letter, 'Draft Interim Staff Guidance JLD-ISG-2016-01, Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation; Focused Evaluation and Integrated Assessment'," July 5, 2016 (ML16166A112).
2. Advisory Committee on Reactor Safeguards, "Draft Interim Staff Guidance JLD-ISG-2016-01, 'Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation; Focused Evaluation and Integrated Assessment'," May 18, 2016 (ML16130A453).
3. U.S. Nuclear Regulatory Commission, COMSECY-15-0019, "Closure Plan for the Reevaluation of Flooding Hazards for Operating Nuclear Power Plants," June 30, 2015 (ML15153A104).
4. U.S. Nuclear Regulatory Commission, SRM-COMSECY-14-0037, "Staff Requirements – COMSECY-14-0037 – Integration of Mitigating Strategies for Beyond-Design-Basis External Events and the Reevaluation of Flooding Hazards," March 30, 2015 (ML15089A236).
5. U.S. Nuclear Regulatory Commission, Interim Staff Guidance JLD-ISG-2016-01, "Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation; Focused Evaluation and Integrated Assessment," Revision 0, July 11, 2016 (ML16162A301).

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Dennis C. Bley
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REFERENCES

1. U.S. Nuclear Regulatory Commission, "Response to the Advisory Committee on Reactor Safeguards Letter, 'Draft Interim Staff Guidance JLD-ISG-2016-01, Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation; Focused Evaluation and Integrated Assessment'," July 5, 2016 (ML16166A112).
2. Advisory Committee on Reactor Safeguards, "Draft Interim Staff Guidance JLD-ISG-2016-01, 'Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation; Focused Evaluation and Integrated Assessment'," May 18, 2016 (ML16130A453).
3. U.S. Nuclear Regulatory Commission, COMSECY-15-0019, "Closure Plan for the Reevaluation of Flooding Hazards for Operating Nuclear Power Plants," June 30, 2015 (ML15153A104).
4. U.S. Nuclear Regulatory Commission, SRM-COMSECY-14-0037, "Staff Requirements – COMSECY-14-0037 – Integration of Mitigating Strategies for Beyond-Design-Basis External Events and the Reevaluation of Flooding Hazards," March 30, 2015 (ML15089A236).
5. U.S. Nuclear Regulatory Commission, Interim Staff Guidance JLD-ISG-2016-01, "Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation; Focused Evaluation and Integrated Assessment," Revision 0, July 11, 2016 (ML16162A301).

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