

August 25, 2006

MEMORANDUM TO: John T. Larkins, Executive Director
Advisory Committee on Reactor Safeguards/
Advisory Committee on Nuclear Waste

FROM: Thomas O. Martin, Director **/RA/**
Division of Safety Systems
Office of Nuclear Reactor Regulation

SUBJECT: TRANSMITTAL OF PROPOSED REVISION TO STANDARD
REVIEW PLAN NUREG-0800, SECTION 9.1.3, REVISION 2,
"SPENT FUEL POOL COOLING AND CLEANUP SYSTEM"

The purpose of this memorandum is to transmit the proposed revision to NUREG-0800, *Standard Review Plan* (SRP), Section 9.1.3, Revision 2, "Spent Fuel Pool Cooling and Cleanup System," to the Advisory Committee on Reactor Safeguards (ACRS) for its consideration.

In accordance with the staff requirements memorandum dated May 10, 2005, on the April 6, 2005, Commission meeting, the Office of Nuclear Reactor Regulation (NRR) has revised SRP Section 9.1.3 (Enclosure 1). To aid in identifying the areas of revision, a redline/strikeout version of this document is also included (Enclosure 2).

The proposed revision updates Revision 1, dated July 1981, and includes most of the changes introduced in the draft Revision 2 of April 1996. In general, changes consist mostly of assigning the review responsibilities by function, with the responsible organizations maintained separately from the SRP itself to minimize impacts of office reorganizations; making editorial and formatting changes as part of the SRP update effort; and updating some references. The revision removes the citation to General Design Criteria (GDC) 44, 45, and 46, since these criteria are embodied in GDC 61 for this system; as such, the overall acceptance criteria in the revised section did not change. In addition, technical rationale elaborating on the acceptance criteria was added to the SRP. The revision also adds standard paragraphs to extend application of the updated SRP section to prospective submittals by applicants pursuant to 10 CFR Part 52.

Several specific changes are worth noting:

The staff is introducing changes in the staff's position with regard to evaluation criteria for spent fuel pool cooling systems. These changes are needed to provide comprehensive review standards that reflect current standard practices, and to allow consideration of more flexible measures to manage heat loads while maintaining adequate SFP cooling capacity during

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normal operations. These changes are consistent with the U.S. Nuclear Regulatory Commission's (NRC's) move to performance-based and risk-informed regulation.

Based on the nature of the changes, the staff recommends that ACRS elect not to review the proposed revision to the SRP. If the ACRS determines that there is a need to review the proposed revision to the SRP, then please inform the technical contact, and NRR will support a subsequent ACRS briefing.

Note that most SRP sections will be issued as final versions without publishing them as drafts and requesting comment. The staff is revising the SRP in this manner to provide a more up-to-date SRP in light of the requirement in 10 CFR 50.34(h) for an applicant to evaluate its facility against the SRP revision in effect 6 months before the docket date of the application. The staff will nonetheless request comment on these final SRP sections, and will address comments received in a subsequent SRP revision. Prior to revision of individual sections, comment resolution may establish that alternatives to the NUREG-0800 acceptance criteria provide an acceptable method of complying with the NRC's regulations.

Also, the staff has determined that the changes do not involve any backfits; therefore the staff is requesting a waiver from review by the Committee to Review Generic Requirements.

Enclosures:

1. Proposed Version of SRP 9.1.3, Rev. 2
2. Redline/Strikeout Version

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