

August 2, 2007

Mr. James H. Riley  
Nuclear Energy Institute  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708

SUBJECT: FINAL LICENSE RENEWAL INTERIM STAFF GUIDANCE  
LR-ISG-2006-03: STAFF GUIDANCE FOR PREPARING SEVERE ACCIDENT  
MITIGATION ALTERNATIVES ANALYSES

Dear Mr. Riley:

By letter dated August 10, 2006, we issued our proposed License Renewal Interim Staff Guidance, LR-ISG-2006-03, for public comments. By letter dated September 15, 2006, Dr. Jill Lipoti, State of New Jersey, Department of Environmental Protection, provided comments and requested that the staff take this opportunity to include a review of the impacts of terrorist attacks on nuclear facilities as part of the National Environmental Policy Act in the interim staff guidance. The staff reviewed Dr. Lipoti's comments and provided responses in a letter dated July 31, 2007, which can be found in the Agencywide Document Access and Management System (ADAMS) under Accession Number ML071380307. No changes were incorporated in the Final LR-ISG-2006-03 based on these comments.

Enclosure 1 is our Final LR-ISG-2006-03. A notice relating to this Final LR-ISG will be published in the *Federal Register*. If you have any questions regarding this matter, please contact Mr. Richard L. Emch, Jr., by telephone at 301-415-1590 or by e-mail at [RLE@nrc.gov](mailto:RLE@nrc.gov).

An identical letter was sent to Mr. David Lochbaum at the Union of Concerned Scientists.

Sincerely,

*/RA/*

Pao-Tsin Kuo, Director  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Project No. 690

Enclosure:  
Final LR-ISG-2006-03

cc w/encl: See next page

August 2, 2007

Mr. David Lochbaum  
Union of Concerned Scientists  
1707 H Street, NW, Suite 600  
Washington, DC 20006-3919

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Division of License Renewal  
Office of Nuclear Reactor Regulation

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Final LR-ISG-2006-03

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Letter to: James H. Riley, David Lochbaum, from: Pao-Tsin Kuo, dated: August 2, 2007

SUBJECT: FINAL LICENSE RENEWAL INTERIM STAFF GUIDANCE  
LR-ISG-2006-03: STAFF GUIDANCE FOR PREPARING SEVERE ACCIDENT  
MITIGATION ALTERNATIVES ANALYSES

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DLR Staff

FINAL LICENSE RENEWAL INTERIM STAFF GUIDANCE LR-ISG-2006-03:  
STAFF GUIDANCE FOR PREPARING SEVERE ACCIDENT MITIGATION  
ALTERNATIVES ANALYSES

Introduction

A Severe Accident Mitigation Alternatives (SAMA) analysis is required as part of a license renewal application, if a SAMA analysis has not already been performed for the plant and reviewed by the NRC staff. SAMA analyses have been performed and submitted to the NRC for all applications for license renewal received by the staff thus far. Therefore, this LR-ISG is being recommended as guidance consistent with our goal to more effectively and efficiently resolve license renewal issues identified by the staff or the industry.

Background and Discussion

After receiving extensive requests for additional information regarding the SAMA analyses, several applicants for license renewal concluded that they did not fully understand the kind of information that the NRC staff was expecting to see in SAMA analyses.

The Nuclear Energy Institute (NEI) developed a generic guidance document to help clarify the NRC staff's expectations regarding the information that should be submitted in SAMA analyses. On April 8, 2005, NEI submitted NEI 05-01, "Severe Accident Mitigation Alternatives (SAMA) Analysis - Guidance Document." The NRC staff reviewed this guidance document, and by letter, dated July 12, 2005, provided comments on NEI 05-01. The NRC staff's comments were discussed during a public meeting between NEI and NRC on July 21, 2005.

On February 17, 2006, NEI submitted its NEI 05-01, Revision A, dated November 2005. The NRC staff reviewed and concluded that this version fully resolved the NRC staff's comments. In addition, the NRC staff concluded that NEI 05-01, Revision A, describes existing NRC regulations and facilitates complete preparation of SAMA analysis submittals.

Some applicants for license renewal have submitted SAMA analyses using the guidance provided in NEI 05-01, Revision A. The NRC staff found improved quality in the submitted SAMA analyses and a reduction in the number of requests for additional information for those applications that followed the guidance provided in NEI 05-01, Revision A.

Recommended Action

The staff is recommending that applicants for license renewal follow the guidance provided in NEI 05-01, Revision A, when preparing their SAMA analyses. The staff finds that NEI 05-01, Revision A, describes existing NRC regulations, and facilitates complete preparation of SAMA analysis submittals.

Although this final LR-ISG does not convey a change in the NRC's regulations or how they are interpreted, it is being provided to facilitate complete preparation of future SAMA analysis submittals in support of applications for license renewal. The NRC staff plans to incorporate the guidance provided in NEI 05-01, Revision A, into a future update of Supplement 1 to Regulatory Guide 4.2, "Preparation of Supplemental Environmental Reports for Applications to

Enclosure

Renew Nuclear Power Plant Operating Licenses.” This LR-ISG provides a clarification of existing guidance with no additional requirements. For those that are interested in reviewing NEI 05-01, Revision A, the Agencywide Documents Access and Management System (ADAMS) Accession Number is ML060530203.

Nuclear Energy Institute

Project No. 690

cc:

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