

June 4, 2009

Dr. Mario V. Bonaca, Chairman  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

SUBJECT: MARCH 18, 2009, ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
LETTER ON USING CONTAINMENT ACCIDENT PRESSURE

Dear Dr. Bonaca:

For some time, the Advisory Committee on Reactor Safeguards (ACRS) and the staff of the U.S. Nuclear Regulatory Commission (NRC) have discussed the use of containment accident pressure to demonstrate that emergency core cooling system and containment heat removal pumps will perform their safety functions in design basis accidents (e.g., a large break loss-of-coolant), and special events (e.g., station blackout). The staff appreciates the insights provided by the ACRS and the substantial amount of time the ACRS has devoted to this important issue.

The staff is carefully reviewing the recommendations of the March 18<sup>th</sup> ACRS letter. In response to the ACRS letter, representatives from the Office of Nuclear Reactor Regulation (NRR) and ACRS met with the Deputy Executive Director for Reactor and Preparedness Programs on May 6<sup>th</sup>. Many options were discussed to resolve the differences between the NRC staff and the ACRS recommendations on this issue. As discussed during the meeting, the staff is evaluating some of your recommendations which entail generic implementation, for example, revising Regulatory Guide 1.82, "Water Sources for Long-term Recirculation Cooling Following a Loss-of-Coolant Accident," but this evaluation will take some time. Therefore, in the near term, the staff is evaluating and factoring your questions and suggestions into its ongoing review of the Tennessee Valley Authority license amendment request to increase the rated thermal power of the Browns Ferry Plant, Units 1, 2, and 3. In particular, since the last ACRS briefing concerning Browns Ferry in July 2008, the licensee has provided more in-depth information that bears on the issues raised in the ACRS letter. The staff is reviewing the usefulness of this information to address the ACRS recommendations and will continue to keep the ACRS informed of the progress on the Browns Ferry review. As discussed, the staff then plans to brief the ACRS on how the issues raised in the ACRS letter will be resolved in regard to the Browns Ferry amendment request, if the application is acceptable to the staff.

M. Bonaca

-2-

While the staff carefully weighs the ACRS recommendations, we may consider delaying issuance of licensing actions currently under review related to changes in the use of containment accident pressure. The staff will continue to review license amendment requests which do not include the use of containment accident pressure in determining available net positive suction head.

Sincerely,

***/RA By Bruce S. Mallett for/***

R. W. Borchardt  
Executive Director  
for Operations

cc: Chairman Jaczko  
Commissioner Lyons  
Commissioner Klein  
Commissioner Svinicki  
SECY

M. Bonaca

-2-

While the staff carefully weighs the ACRS recommendations, we may consider delaying issuance of licensing actions currently under review related to changes in the use of containment accident pressure. The staff will continue to review license amendment requests which do not include the use of containment accident pressure in determining available net positive suction head.

Sincerely,

**/RA By Bruce S. Mallett for/**

R. W. Borchardt  
Executive Director  
for Operations

cc: Chairman Jaczko  
Commissioner Lyons  
Commissioner Klein  
Commissioner Svinicki  
SECY

DISTRIBUTION: G20090158/EDATS: OEDO-2009-0133

RidsEdoMailCenter	RidsOgcMailCenter	RidsAcrsAcnw_MailCTR	RidsResOd
RidsNrrMailCenter	RidsNrrAdro	RidsNrrAdes	RidsNrrOd
ACRS File			

**ADAMS Accession Number: ML090890541** \* via email

<b>OFFICE</b>	Tech Ed*	NRR/DSS/SCVB	NRR/DSS/SCVB: BC	NRR/DSS	NRR/DRA
<b>NAME</b>	KKribbs	RLobel	RDennig (HWalker for)	WRuland	MCunningham
<b>DATE</b>	04/23/09	04/23/09	04/23/09	06/ /09	04/23/09
<b>OFFICE</b>	NRR/DORL	OGC	NRR	EDO	
<b>NAME</b>	JGitter	EWilliamson	ELeeds	RBorchardt (BMallett for)	
<b>DATE</b>	06/ /09	05/11/09	05/15/09	06/04/09	

**OFFICIAL RECORD COPY**