



NUCLEAR ENERGY INSTITUTE

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**To:** Administrative Points of Contact

**Subject:** Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" Evaluation and 3 Month Response Template

The purpose of this letter is to provide guidance for your response to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems". **Please distribute this letter to individuals in your licensing and systems engineering departments responsible for the generic letter response.**

GL 2008-01 requested that each licensee evaluate its Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges the operability of these systems, and take appropriate action when conditions adverse to quality are identified.

A written response consistent with the requested actions and information is required within nine (9) months of the date of the generic letter. If the requested response date cannot be met for any evaluations requested in the generic letter, a 3-month response (due on April 11, 2008) is required which describes the alternative course of action proposed and the basis for its acceptability.

**Generic Letter Response Guidance Document (Enclosure 2)**

The industry has prepared guidance for the evaluations requested by GL 2008-01. The guidance includes a list of recommended activities and identifies which of the individual activities are expected to be complete by October 11, 2008 (9 months from the date of the GL). This evaluation guidance is provided as Enclosure 2. Enclosure 1 provides additional information that should be considered as you review Enclosure 2 and plan your activities and generic letter response.

The enclosed guidance was developed using input received from utilities and the NSSS Owners Groups and is the best information available to date on this subject. NEI and the Owners Groups have reviewed this guidance with the NRC. However, the activities described are not the only way to address the situation and should not be considered mandatory. **Ultimately, utilities must undertake whatever actions they believe are necessary, based on plant specific**

**considerations, to completely address the GL's request.** The guidance from Enclosure 2 should assist in identifying the effort to be performed.

### **3-Month Generic Letter Response Template (Enclosure 3)**

The NRC expects that licensees will submit a 3-month response if there are any activities that the licensee believes are necessary for its 9-month response but which cannot be completed within nine months. Enclosure 3 contains a template for a 3-month letter in case a licensee determines that the required evaluation(s) will not be complete by October 11, 2008. The 9-month response should be supplemented, as necessary, when actions as described in the 3-month letter have been completed.

A rigorous evaluation of the systems and detailed walkdowns are necessary to respond to the generic letter. As a result, some licensees are submitting a 3-month response and some are not. The combination of system walkdowns and other information necessary to adequately respond to the NRC's request is a plant specific decision.

If a licensee does submit a 3-month response, in addition to describing the tasks that will be completed beyond nine months, the NRC has requested that utilities also describe the actions that will be complete prior to nine months.

### **Completion of Activities**

The NRC acknowledges that corrective actions resulting from the required evaluations may not be completed by the time of the 9-month response. The final evaluations and the identification of any corrective actions resulting from the evaluations (not the completion of all corrective actions) constitute a complete 9-month response.

### **Utility Level of Effort**

The NRC expects that utilities will complete as many of the activities necessary to respond to the generic letter as possible prior to nine months, and any activities that are deferred will be completed at the first refueling outage after the 9-month response is due. If your plant has a refueling outage in the fall of 2008, most, if not all, of the activities should be completed at that time.

### **9-Month Generic Letter Response Template**

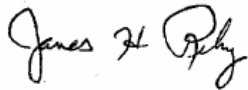
Enclosure 2 provides the activities recommended for a complete response to GL 2008-01. A template for a 9-month response letter will be provided by the middle of April.

**Best Practices**

Licensees are encouraged to share lessons learned and experience gained as we progress through this evaluation process. The NEI Gas Accumulation Team Web Board has been established as a repository for this information as well as a discussion forum. You can access the Web Board at the following address: <http://atom.nei.org/Default.aspx?alias=atom.nei.org/gasaccumulationissues>.

If there are any questions on this material, please contact me (202-739-8137; [jhr@nei.org](mailto:jhr@nei.org)) or Mike Melton (202-739-8049; [mam@nei.org](mailto:mam@nei.org)).

Sincerely,

A handwritten signature in black ink, appearing to read "James H. Riley". The signature is written in a cursive, flowing style.

James H. Riley

Enclosures