NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: Chairman Gregory B. Jaczko

SUBJECT: SECY-10-0113 – CLOSURE OPTIONS FOR GENERIC SAFETY ISSUE -191, ASSESSMENT OF DEBRIS ACCUMULATION ON PRESSURIZED WATER REACTOR SUMP PERFORMANCE

Approved __X___ Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below ___ Attached _X__ None ___

SIGNATURE

11/2/10

DATE

Entered on "STARS" Yes ___ No ___

Chairman Jaczko's Comments on SECY-10-0113,
"CLOSURE OPTIONS FOR GENERIC SAFETY ISSUE – 191, ASSESSMENT OF DEBRIS ACCUMULATION ON PRESSURIZED WATER REACTOR SUMP PERFORMANCE"

I approve the staff's recommendation for resolution of Generic Safety Issue -191 (GSI-191). I commend the staff for providing this comprehensive paper in the relative short period since the last Commission Meeting in April 2010. I would also like to express my appreciation to the ACRS for fitting in an independent review into their busy schedule.

GSI-191, the potential for debris blockage of emergency core cooling systems, is an important safety issue that should be resolved in the best possible manner without needless delay. It has been over 30 years since the staff first raised concerns in 1979 concerning sump designs in Unresolved Safety Issue A-43, "Containment Emergency Sump Performance." Following upgrades to resolve boiling water reactor strainer clogging, the staff identified new concerns in the late 1990's with debris generated following a design basis loss of coolant accident. To address this issue, the staff developed GL 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized Water Reactors." While much has been done by the staff and licensees to make physical modifications to their sump screens, resulting in significant safety improvements, the agency needs to provide clear and decisive guidance to finally resolve this issue.

I support the staff's ongoing efforts as outlined in Option 1. To date, 48 of 69 plants have sufficiently demonstrated their plans for closure to the staff, and I believe the remaining plants can do so as well. While I fully support Option 1, I agree with Commissioner Apostolakis to approve Option 1.b in combination with Option 2 as an additional viable path forward.

I also believe it is important to develop a schedule for closure. Recognizing the uncertainty with in-vessel effects testing, and the need to refine risk informed guidance, I agree with Commissioner Apostolakis' proposed timeline for resolving this issue. This would allow more than sufficient time for licensees to identify and complete any potential modifications.

I also agree with the staff and ACRS that leak-before-break should not be used to resolve this issue. This option would result in a reduction in defense-in-depth due to the potential for core damage and degradation of mitigation due to the single failure of clogging the emergency core cooling sumps, independent of any additional independent failures. There is no perceived safety benefit for its use in this issue. The staff and ACRS have evaluated the option numerous times, and I think it is best to follow their technical expertise.

While GSI-191 has been a challenging issue and the staff and industry have worked hard to find solutions, this important safety issue needs to be finally resolved.

Gregory B. Jaczko — 11/2/10
Date