

EDO Principal Correspondence Control

FROM: DUE: 03/24/11 EDO CONTROL: G20110123
DOC DT: 02/17/11
FINAL REPLY:

Said Abdel-Khalik, ACRS

TO:

Chairman Jaczko

FOR SIGNATURE OF : ** GRN ** CRC NO: 11-0074

Borchardt, EDO

DESC:

ROUTING:

SECY-11-0014, "Use of Containment Accident
Pressure in Analyzing Emergency Core Cooling
System and Containment Heat Removal System Pump
Performance in Postulated Accidents"
(EDATS: SECY-2011-0085)

Borchardt
Weber
Virgilio
Ash
Muessle
OGC/GC
Johnson, NRO
Frazier, OEDO

DATE: 02/23/11

ASSIGNED TO: CONTACT:

NRR

Leeds

SPECIAL INSTRUCTIONS OR REMARKS:

Please prepare responsen to ACRS for the signature
of the EDO. Add the Commission and SECY as cc's.
Also, include RidsAcrsAcnw_MailCTR Resource to your
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LINE IN RESPONSE.

Template: SECY-017

E-RIDS: SECY-01



EDATS Number: SECY-2011-0085

Source: SECY

General Information

Assigned To: NRR

OEDO Due Date: 3/24/2011 11:00 PM

Other Assignees:

SECY Due Date: NONE

Subject: SECY-11-0014, "Use of Containment Accident Pressure in Analyzing Emergency Core Cooling System and Containment Heat Removal System Pump Performance in Postulated Accidents"

Description:

CC Routing: NRO

ADAMS Accession Numbers - Incoming: NONE

Response/Package: NONE

Other Information

Cross Reference Number: G20110123, LTR-11-0074

Staff Initiated: NO

Related Task:

Recurring Item: NO

File Routing: EDATS

Agency Lesson Learned: NO

OEDO Monthly Report Item: NO

Process Information

Action Type: Letter

Priority: Medium

Sensitivity: None

Signature Level: EDO

Urgency: NO

Approval Level: No Approval Required

OEDO Concurrence: NO

OCM Concurrence: NO

OCA Concurrence: NO

Special Instructions: Please prepare response to ACRS for the signature of the EDO. Add the Commission and SECY as cc's. Also, include RidsAcrsAcnw_MailCTR Resource to your distribution on the concurrence page. USE SUBJECT LINE IN RESPONSE.

Document Information

Originator Name: Said Abdel-Khalik

Date of Incoming: 2/17/2011

Originating Organization: ACRS

Document Received by SECY Date: 2/23/2011

Addressee: Chairman Jaczko

Date Response Requested by Originator: NONE

Incoming Task Received: Letter

**OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET**

Date Printed: Feb 22, 2011 16:34

PAPER NUMBER: LTR-11-0074
ACTION OFFICE: EDO

LOGGING DATE: 02/18/2011

AUTHOR: Said Abdel-Khalik
AFFILIATION: ACRS
ADDRESSEE: CHRM Gregory Jaczko

SUBJECT: SECY-11-0014, Use of Containment Accident Pressure in Analyzing Emergency Core Cooling System and Containment Heat Removal System Pump performance in Postulated Accidents

ACTION: Appropriate
DISTRIBUTION: RF

LETTER DATE: 02/17/2011

ACKNOWLEDGED No

SPECIAL HANDLING:

NOTES:

FILE LOCATION: ADAMS ML110450555

DATE DUE:

DATE SIGNED:



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, DC 20555 - 0001**

February 17, 2011

The Honorable Gregory B. Jaczko
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**SUBJECT: SECY-11-0014, "USE OF CONTAINMENT ACCIDENT PRESSURE IN
ANALYZING EMERGENCY CORE COOLING SYSTEM AND
CONTAINMENT HEAT REMOVAL SYSTEM PUMP PERFORMANCE IN
POSTULATED ACCIDENTS"**

Dear Chairman Jaczko:

In a June 25, 2010, Staff Requirements Memorandum, the Commission directed the staff to discuss where the staff aligns with the ACRS and disagrees with the ACRS regarding containment accident pressure (CAP) credit, including use of risk information, defense-in-depth implications, and need to assess the practicality of hardware changes to eliminate the need for CAP credit. During our 580th meeting, February 10-12, 2011, the staff presented an overview of their document on CAP credit, SECY-11-0014.

We continue to support the recommendations and positions described in our May 19, 2010 letter report.

The disagreement between our position and that of the staff appears to have increased. The staff continues to disagree with our position that crediting containment accident pressure is a serious compromise of the independence of the prevention and mitigation functions, a basic element of the defense-in-depth philosophy. They continue to argue that there is no regulatory basis to request that licensees provide plant-specific risk information to help assess the challenge to defense in depth and support crediting CAP.

Regulatory Guide 1.82 has always included a position that CAP credit should be granted only if the design cannot be practicably altered to eliminate the need for credit. The staff intends

to remove this regulatory position, since, in their view, they do not have the regulatory authority to require licensees to evaluate whether requirements can be met in a particular way. Thus, they conclude that an analysis showing that the calculated containment accident pressure provides adequate net positive suction head is as acceptable as a design change that eliminates the need for CAP credit. We disagree.

Sincerely,

/RA/

Said Abdel-Khalik
Chairman

References:

1. NRC Letter; Subject: "Draft Guidance on Containment Accident Pressure in Meeting the Net Positive Suction Head Required to Demonstrate that Safety Systems Can Mitigate Accidents as Designed," dated May 19, 2010 (ML1013003320)
2. SECY-11-0014, "Use of Containment Accident Pressure in Analyzing Emergency Core Cooling System and Containment Heat Removal System Pump Performance in Postulated Accidents," dated January 31, 2011 (ML102590196)
3. Enclosure 1 to SECY-11-0014, Staff Guidance, "The Use of Containment Accident Pressure in Reactor Safety Analysis," dated January 31, 2011 (ML102110167)
4. Enclosure 2 to SECY-11-0014, "Areas of Agreement and Disagreement between the NRC Staff and the Advisory Committee on Reactor Safeguards (ACRS), dated January 31, 2011 (ML102780592)
5. ACRS Memorandum, "ACRS Members Concerns Regarding Containment Overpressure (COP) Credit for Browns Ferry Extended Power Uprate," dated November 10, 2008 (ML082971024)