

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 responses to ACRS for the signature of the EDO. Add the Commission and SECY as cc's. Also, include RidsAcrcsAcnw\_MailCTR Resource to your distribution on the concurrence page. USE SUBJECT LINE IN RESPONSE.

Template: SECY-017

ERIDS: SECY-01

# EDATS

Electronic Document and Action Tracking System



**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*

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**PAPER NUMBER:** LTR-11-0074 **LOGGING DATE:** 02/18/2011  
**ACTION OFFICE:** EDO

**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:**

EDO --G20110123



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 580<sup>th</sup> 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)