

Attachment 3

NRC INSPECTION MANUAL

IRIB

TEMPORARY INSTRUCTION 2515/183

FOLLOWUP TO THE FUKUSHIMA DAIICHI NUCLEAR STATION FUEL DAMAGE EVENT

CORNERSTONE: INITIATING EVENTS AND MITIGATING SYSTEMS

APPLICABILITY: This Temporary Instruction (TI) applies to all holders of operating licenses for nuclear power reactors, except plants which have permanently ceased operations.

2515/183-01 OBJECTIVES

The objective of this TI is to independently assess the adequacy of actions taken by licensees in response to the Fukushima Daiichi nuclear station fuel damage event. The inspection results from this TI will be used to evaluate the industry's readiness for a similar event and to aid in determining whether additional regulatory actions by the U.S. Nuclear Regulatory Commission are warranted. Therefore, the intent of this TI is to be a high-level look at the industry's preparedness for events that may exceed the design basis for a plant. If necessary, a more specific followup inspection will be performed at a later date.

2515/183-02 BACKGROUND

On March 11, 2011, the Tohoku-Taiheiyou-Oki Earthquake occurred near the east coast of Honshu, Japan. This magnitude 9.0 earthquake and the subsequent tsunami caused significant damage to at least four of the six units of the Fukushima Daiichi nuclear power station as the result of a sustained loss of both the offsite and on-site power systems. Efforts to restore power to emergency equipment have been hampered or impeded by damage to the surrounding areas due to the tsunami and earthquake. The following background information is current as of March 18, 2011.

Units 1 through 3, which had been operating at the time of the earthquake, scrambled automatically, inserting their neutron absorbing control rods to ensure immediate shutdown of the fission process. Following the loss of electric power to normal and emergency core cooling systems and the subsequent failure of back-up decay heat removal systems, water injection into the cores of all three reactors was compromised, and reactor water levels could not be maintained. Tokyo Electric Power Company (TEPCO), the operator of the plant, resorted to injecting sea water and boric acid into the reactor vessels of these three units, in an effort to cool the fuel and ensure the reactors remained shutdown. However, the fuel in the reactor cores became partially uncovered. Hydrogen gas built up in Units 1 and 3 as a result of exposed, overheated fuel reacting with water. Following gas venting from the primary containment to relieve

pressure, hydrogen explosions occurred in both units and damaged the secondary containments. It appears that primary containments for Units 1 and 3 remained functional, but the primary containment for Unit 2 may have been damaged. TEPCO cut a hole in the side of the Unit 2 secondary containment to prevent hydrogen buildup following a sustained period when there was no water injection into the core.

In addition, problems were encountered with monitoring and maintaining Units 3 and 4 spent fuel pool (SFP) water levels. Efforts continue to supply seawater to the SFPs for Units 1 through 4 using various methods. At this time, the integrity of the SFPs for Units 3 and 4 is unknown.

Fukushima Daiichi Units 4 through 6 were shutdown for refueling outages at the time of the earthquake. The fuel assemblies for Unit 4 had been offloaded from the reactor core to the SFP. The SFPs for Units 5 and 6 appear to be intact.

The damage to Fukushima Daiichi nuclear power station appears to have been caused by initiating events that may have exceeded the design basis for the facilities.

2515/183-03 INSPECTION REQUIREMENTS AND GUIDANCE

NRC inspection staff should assess the licensee's activities and actions to assess its readiness to respond to an event similar to the Fukushima Daiichi nuclear plant fuel damage event. These inspections should occur at the operating power reactor facilities. Licensee emergency preparedness will not be assessed by this TI.

This TI may be completed all at once or in phases as the licensee verifies its capability to respond to such an event. The inspector(s) should coordinate the inspection effort with the licensee in accordance with the licensee's verification schedule.

The events at the Fukushima Daiichi plant appear to be caused by factors directly impacting nuclear safety that may have exceeded the design basis for the facility. While details on the full extent of damage to these units remain unknown, the damage poses a significant challenge to the nuclear safety of these units. Immediate actions by the U.S. industry are appropriate to assess and take corrective actions to address potential vulnerabilities that would challenge response to events that are beyond site design bases.

03.01 Assess the licensee's capability to mitigate conditions that result from beyond design basis events, typically bounded by security threats, committed to as part of NRC Security Order Section B.5.b issued February 25, 2002, and severe accident management guidelines and as required by Title 10 of the Code of Federal Regulations (10 CFR) 50.54(hh). Use Inspection Procedure (IP) 71111.05T, "Fire Protection (Triennial)," Section 02.03 and 03.03 as a guideline. If IP 71111.05T was recently performed at the facility the inspector should review the inspection results and findings to identify any other potential areas of inspection. Particular emphasis should be placed on strategies related to the spent fuel pool. The inspection should include, but not be limited to, an assessment of any licensee actions to:

- a. Verify through test or inspection that equipment is available and functional. Active equipment shall be tested and passive equipment shall be walked down and inspected. It is not expected that permanently installed equipment that is tested under an existing regulatory testing program be retested.
- b. Verify through walkdowns or demonstration that procedures to implement the strategies associated with B.5.b and 10 CFR 50.54(hh) are in place and are executable. Licensees may choose not to connect or operate permanently installed equipment during this verification.
- c. Verify the training and qualifications of operators and the support staff needed to implement the procedures and work instructions are current for activities related to Security Order Section B.5.b and severe accident management guidelines as required by 10 CFR 50.54 (hh).
- d. Verify that any applicable agreements and contracts are in place and are capable of meeting the conditions needed to mitigate the consequences of these events.
- e. Review any open corrective action documents to identify vulnerabilities that may not have yet been addressed.

03.02 Assess the licensee's capability to mitigate station blackout (SBO) conditions, as required by 10 CFR 50.63, "Loss of All Alternating Current Power," and station design, is functional and valid. Refer to TI 2515/120, "Inspection of Implementation of Station Blackout Rule Multi-Plant Action Item A-22" as a guideline. It is not intended that TI 2515/120 be completely reinspected. The inspection should include, but not be limited to, an assessment of any licensee actions to:

- a. Verify through walkdowns and inspection that all required materials are adequate and properly staged, tested, and maintained.
- b. Demonstrate through walkdowns that procedures for response to an SBO are executable.

03.03 Assess the licensee's capability to mitigate internal and external flooding events required by station design. Refer to IP 71111.01, "Adverse Weather Protection," Section 02.04, "Evaluate Readiness to Cope with External Flooding" as a guideline. The inspection should include, but not be limited to, an assessment of any licensee actions to verify through walkdowns and inspections that all required materials and equipment are adequate and properly staged. These walkdowns and inspections shall include verification that accessible doors, barriers, and penetration seals are functional.

03.04 Assess the thoroughness of the licensee's walkdowns and inspections of important equipment needed to mitigate fire and flood events to identify the potential that the equipment's function could be lost during seismic events possible for the site. Assess the licensee's development of any new mitigating strategies for identified vulnerabilities (e.g., entered it in to the corrective action program and any immediate

actions taken). As a minimum, the licensee should have performed walkdowns and inspections of important equipment (permanent and temporary) such as storage tanks, plant water intake structures, and fire and flood response equipment; and developed mitigating strategies to cope with the loss of that important function. Use IP 71111.21, "Component Design Basis Inspection," Appendix 3, "Component Walkdown Considerations," as a guideline to assess the thoroughness of the licensee's walkdowns and inspections.

2515/183-04 REPORTING REQUIREMENTS

The inspection results, including both observations and findings, of this TI should be in a stand-alone report. NOTE: This TI will be updated with a template which will provide specific guidance on reporting and documenting observations and findings.

The inspection report containing the results should be forwarded to NRR/DIRS/IRIB, Attention: Tim Kobetz via e-mail at timothy.kobetz@nrc.gov. Mr. Kobetz can also be reached at (301) 415-1932. The inspection results from this TI will be used to evaluate industry's readiness for a similar event and to aid in determining whether additional NRC regulatory actions are warranted.

2515/183-05 COMPLETION SCHEDULE

This TI is to be initiated upon issuance. Inspection activities are to be completed by April 29, 2011 and the inspection report issued by May 13, 2011.

2515/183-06 EXPIRATION

The TI will expire on June 30, 2012.

2515/183-07 CONTACT

Any technical questions regarding this TI should be addressed to Tim Kobetz at 301-415-1932 or timothy.kobetz@nrc.gov.

2515/183-08 STATISTICAL DATA REPORTING

All direct inspection effort expended on this TI is to be charged to 2515/183 with an IPE code of TI. All indirect inspection effort expended on this TI for preparation and documentation should be attributed to activity codes TIP and TID respectively.

2515/183-9 RESOURCE ESTIMATE

The estimated average time to complete the TI inspection requirements is 40 hours per site. Where applicable, inspectors should credit the baseline inspection program for samples reviewed during this TI assessment.

2515/183-10 TRAINING

Issue Date: 03/23/11

No additional training is required.

END

ATTACHMENT 1

Revision History for TI 2515/183
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Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	ML11077A007 03/23/11	Researched commitments for 4 years and found none. This is a new document issued for inspections related to the industry response to the Fukushima Daiichi Nuclear Station Fuel Damage Event.	No	N/A	N/A