

Recommendation 2.1: Plan of Action

Scope:

- This recommendation consists of two phases:
 - Phase 1: Issue generic 50.54(f) letters to all licensees to reevaluate the seismic and flooding hazards at their sites against present-day regulatory guidance and methodologies used for ESP and COL reviews.
 - Phase 2: If necessary, update the design basis and SSCs important to safety to protect against the updated hazards.
- [ref: NTTF Report pg 30, Staff Recommendations SECY 11-0124 Enclosure pg 3]
- SRM SECY 11-0124 states, “For Recommendation 2.1, when the staff issues the request for information to licensees pursuant to 10 CFR 50.54(f) to identify actions that have been taken or are planned to address plant-specific vulnerabilities associated with the reevaluation of seismic and flooding hazards, the staff should explain the meaning of ‘vulnerability.’”
- SRM SECY 11-0124 states, “The staff should inform the Commission, either through an Information Paper or briefing of the Commissioners’ Assistants, when it has developed the technical bases and acceptance criteria for implementing Recommendation 2.1, 2.3, and 9.3.”
- SECY 11-0124 states, “Initiate stakeholder interactions to discuss application of present-day regulatory guidance and methodologies being used for ESP and COL reviews to the reevaluation of flooding hazards.”
- SECY 11-0124 states, “Continue stakeholder interactions to discuss the technical basis and acceptance criteria for conducting a reevaluation of site specific seismic hazards. This would include implementation considerations of the hazard and risk methodologies described in draft Generic Letter (GL)...(ML111710783)” related to GI-199.
- SECY 11-0124 states, “To the extent practical, the new information on the events at Fukushima Daiichi and Daini should be incorporated into the reevaluations.”
- Two 50.54(f) letters (Phase 1) will be developed, one for seismic and one for flooding related issues. Although the technical details will be different, an effort will be made to define recommendation-specific terms, such as vulnerability, in a similar way.

Near Term Actions:

Define the following terms:

- ‘Plant-specific vulnerability’ for Recommendation 2.1, per SRM SECY11-0124
- ‘Acceptance criteria’ for Recommendation 2.1
- ‘Technical bases’ for Recommendation 2.1
- “Present-day regulatory guidance and methodologies used for ESP and COL reviews”

Key Considerations to be Addressed

- Generic 50.54(f) deliverables
 - Develop timelines, intermediate products, and final products for flooding and seismic reevaluation
- NRC's Generic Issues Program Items
 - GL related to GI-199 "Seismic Risk Evaluations for Operating Reactors"
 - Develop process for incorporating draft GL comments into Recommendation 2.1
 - Determine remaining actions needed to close GI-199
 - Examine other Generic Issues pertinent to site flooding, if any.
- Reconcile recent site-specific events to inform the Recommendation 2.1 process:
 - Updated/revised river flood levels at several NPP sites and flood protection lessons learned from recent events.
 - Recent earthquakes and response
- Deliverables and Guidance to meet Scope
 - Site-specific data needs and technical implementation issues
 - Format and level-of-information needed in responses
 - Guidance needed to aid and improve a uniform response, expedite staff's review, and minimize requests for additional information.
- Evaluation of Other International Documents
 - European Stress Tests
 - International response reports regarding Fukushima/Japan Earthquake and Tsunami.

Schedule of Deliverables [per the Enclosure to SECY 11-0137; awaiting SRM]

Schedule for Reevaluations

- I. Develop 10 CFR 50.54(f) letter**
 - 6 months for Seismic (April 2012)
 - 8 months for Flooding (June 2012)
- II. Evaluate licensee responses to 10 CFR 50.54(f) letter**
 - Schedule to be determined
- III. Issue orders to licensees (if needed)**
 - Labeled 'Phase 2' in the Scope above
 - 3 months following decision to issue orders
- IV. Conduct inspection activities**
 - Schedule to be determined
- V. Issue letters to close out 10 CFR 50.54(f) letter and/or orders**
 - 1 month after last inspection

Recommendation 2.3: Plan of Action

Scope:

- Develop and issue a request for information to licensees pursuant to 10 CFR 50.54(f) to:
 - 1) develop a methodology and acceptance criteria for seismic and flooding walkdowns to be endorsed by the staff following interaction with external stakeholders,
 - 2) perform seismic and flood protection walkdowns to identify and address plant-specific vulnerabilities (through corrective action program) and verify the adequacy of monitoring and maintenance for protection features, and
 - 3) inform the NRC of the results of the walkdowns and correction actions taken or planned. [ref: SECY 11-0124, Enclosure pg 5]
- SRM SECY 11-0124 states, “The Commission has approved the staff’s proposed actions to implement without delay the Near-Term Task Force recommendations as described in SECY-11-0124,” subject to comments.
- SRM SECY 11-0124 states, “The staff should inform the Commission, either through an Information Paper or briefing of the Commissioners’ Assistants, when it has developed the technical bases and acceptance criteria for implementing Recommendation 2.1, 2.3, and 9.3.”
- SECY 11-0124 states for seismic, “Recent plant inspections by staff in accordance with Temporary Instruction 2515/183...and licensees’ plant inspections in response to the Fukushima Daiichi accidents will help inform the implementation of this recommendation.”
- SECY 11-0124 states for flooding, “Results of staff’s inspections at nuclear power sites in accordance with Temporary Instruction 2515/183 identified potential issues and observations regarding mitigation measures.”
- Two 50.54(f) letters will be developed, one for seismic and one for flood protection walkdowns. Although the technical details will be different, an effort will be made to define recommendation-specific terms, such as vulnerability, in a similar way.

Near Term Actions:

Define the following terms:

- ‘Plant-specific vulnerability’ for Recommendation 2.3
- ‘Technical Bases’ for Recommendation 2.3
- ‘Acceptance Criteria’ for Recommendation 2.3

Key Considerations to be Addressed

- Generic 50.54(f) letter deliverables
 - Develop timelines, intermediate products, and final products for seismic and flood protection walkdowns.
- Review and apply, as appropriate, existing guidance and recent site-specific events to inform the Recommendation 2.3 walkdown process [see SECY 11-0137, Enclosure pg 12 and following]:
 - Seismic
 - EPRI Report NP-6041-SL Revision 1
 - SQUG GIP procedure for Seismic Verification of NPP Equipment
 - IAEA Safety Guide NS-G-2.13
 - Recent plant inspections in accordance with Temporary Instruction 2515/183
 - Recent Mineral, VA earthquake and associated inspections.
 - Flooding
 - Recent plant inspections in accordance with Temporary Instruction 2515/183
 - Flood events at NPP sites, associated inspections, and temporary flood mitigation measures.
- Deliverables and Guidance to meet Scope
 - Site-specific data needs and technical implementation issues
 - Format and level-of-information needed in responses
 - Guidance needed to aid and improve a uniform response, expedite staff's review, and minimize requests for additional information.

Schedule of Deliverables [per the Enclosure to SECY 11-0137; awaiting SRM]

Schedule for Reevaluations

VI. Develop 10 CFR 50.54(f) letter

- 6 months for Seismic (April 2012)
- 8 months for Flooding (June 2012)

VII. Evaluate licensee responses to 10 CFR 50.54(f) letter

- Schedule to be determined

VIII. Issue orders to licensees (if needed)

- 3 months following decision to issue orders

IX. Conduct inspection activities

- Schedule to be determined

X. Issue letters to close out 10 CFR 50.54(f) letter and/or orders

- 1 month after last inspection