

December 27, 2011

MEMORANDUM TO: Robert J. Pascarelli, Chief
Projects Management Branch
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

FROM: G. Edward Miller, Project Manager /RA/
Projects Management Branch
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SUBJECT: SUMMARY OF DECEMBER 14, 2011, PUBLIC MEETING ON
IMPLEMENTATION OF NEAR-TERM TASK FORCE
RECOMMENDATIONS 2.1 AND 2.3, FLOODING AND SEISMIC
PROTECTIONS, RELATED TO THE FUKUSHIMA DAIICHI
NUCLEAR POWER PLANT ACCIDENT

On December 14, 2011, U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting¹ with the Nuclear Energy Institute (NEI) and industry representatives to review and assess the recommendations in the *Near-Term Task Force (NTTF) Recommendations for Enhancing Reactor Safety in the 21st Century* report, issued July 12, 2011². The meeting was focused specifically on the NTTF Recommendations 2.1 and 2.3, flooding and seismic protections, which are part of the Tier 1 recommendations under consideration for implementation without unnecessary delay. Recommendation 2.1 recommends that licensees provide an updated evaluation of the seismic and flooding hazards at their sites using present-day regulatory guidance and methodologies. Recommendation 2.3 recommends that licensees perform walkdowns to identify and address plant-specific seismic and flooding issues. These recommendations have two separate phases. In Phase 1, the NRC will issue requests for information, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(f), to all licensees to submit the evaluations and results of the walkdowns. In Phase 2, the NRC will evaluate the results of these responses and initiate any appropriate regulatory actions.

The meeting was divided into two sessions. The morning session focused on Recommendations 2.1 and 2.3 for flooding and the afternoon session followed the same format for seismic issues. For each session, the NRC staff provided a short introduction on the NRC Fukushima Dai-ichi Tier 1 NTTF recommendations focusing on the NTTF seismic and flooding recommendations. This was followed by a presentation³ on the NRC staff's plan of action⁴.

¹ The original meeting notice is available via the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML11336A344.

² The NTTF report is available under ADAMS Accession No. ML111861807.

³ The NRC staff slides are available under ADAMS Accession No. ML11347A304

⁴ The NRC staff draft plan of action is available under ADAMS Accession No. ML11346A007

Following the NRC staff's presentation in each session, representatives from NEI made a presentation⁵. Part of the discussion during the morning session involved a problem statement developed by NEI⁶.

NEI and industry representatives presented their proposed NTTF Recommendation 2.1 and 2.3 approach focusing on "Diverse & Flexible Mitigation Capability (FLEX)," which was presented as a way to enhance defense-in-depth and safety. The FLEX concept would, as proposed by NEI and the industry, employ equipment and structures integrated with emergency operating procedures and severe accident management and mitigation guidelines, as well as emergency preparedness strategies. As described, this would focus less on specific site vulnerabilities and the current licensing basis at each plant but rather assume a non-specific, beyond design basis, event that causes an extended station black out condition. Plant and site specific equipment and strategies would be employed to cool the core, containment and spent fuel pool, assuming a loss of normal plant heat sink. The FLEX concept would not include a re-evaluation of the seismic and flooding hazards as directed in Recommendation 2.1⁷.

The NRC staff provided feedback that, although the FLEX concept would be a positive interim step to enhance safety, the purpose of Recommendation 2.1 is to verify the adequacy of the current licensing basis. Specifically, the NRC intends to compare the results of the evaluation required by Recommendation 2.1 to the current licensing basis and determine if additional regulatory action is warranted. The NRC staff further emphasized that augmentation of a site's ability to mitigate accidents beyond the current licensing basis cannot address the adequacy of the current licensing basis.

The NEI representatives indicated that they would pursue additional interactions with the NRC Steering Committee and the Commission regarding use of the FLEX concept. The NRC staff emphasized that, regardless of how the FLEX concept would be implemented, it was proceeding with the development of 50.54(f) letters in accordance with the expected issuance of a Staff Requirements Memorandum (SRM) directing the staff to do so in accordance with SECY-11-0137⁸.

There was general agreement between the participants about the need to develop criteria and methodologies for flooding and seismic walkdowns. A preliminary, high-level, discussion was held on these criteria and methodologies and it was acknowledged they should draw on the insights gained from recent inspections such as Temporary Instruction 2515/183, "Followup to the Fukushima Daiichi Nuclear Station Fuel Damage Event."

⁵ The NEI flooding slides are available under ADAMS Accession No. ML11348A015 and the NEI seismic slides are under Accession No. ML11348A016

⁶ The NEI problem statement is available under ADAMS Accession No. ML11343A002

⁷ NEI Indicated that a white paper describing the FLEX plan was being drafted and was expected to be submitted to the NRC by the end of the calendar year.

⁸ Subsequent to the meeting, SRM SECY-11-0137 was issued on December 15, 2011 and is available under ADAMS Accession No. ML113490055. With respect to recommendation 2.1, the SRM directs the NRC staff to issue 50.54(f) letters requesting re-evaluation of seismic and flooding hazards.

Participants also discussed the relationship of the proposed 50.54(f) request for information letters on the draft generic letter (GL) currently out for comment as part of the review of Generic Issue (GI) 199, "Implications of Updated Probabilistic Seismic Hazard Estimates in Central and Eastern United States on Existing Plants," project. The staff stated that it is considering using the basic structure of the draft GL for GI-199 to collect the seismic information needed for the proposed 50.54(f) letter. A reminder was announced that the comment period for the draft Generic Letter associated with GI-199, ends on December 15, 2011. The NRC staff and the stakeholders generally discussed how the FLEX mitigation strategy could affect the need for a response to the draft GI-199 GL request. The NRC staff expressed concerns that should the FLEX plan, as described, be implemented in lieu of the seismic re-evaluation currently part of the draft GL, that the objectives of GI-199 might not be met. The industry representatives expressed concern about the ability to complete an industry-wide seismic re-evaluation like that described in the draft GL within the time frame proposed for the completion of the NTF recommendations.

Additionally, it was noted that the next meeting is tentatively planned for January 18, 2012 and that a meeting between the NRC and NEI Steering Committees was being planned for early January 2012. Separate meeting notices will be published on the NRC website announcing the details of these meetings.

The meetings concluded with some questions and comments from the public stakeholders.

Enclosure:
List of Attendees

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K. Manoly, NRR	

ADAMS Accession Nos.: ML11361A135 Pkg., ML11353A390 Sum., ML1136A137 Encl.

OFFICE	PM: NRR/JLD/PMB	LA: NRR/DORL	BC: NRR/JLD/PMB	PM: NRR/JLD/PMB
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DATE	12/23/2011	12/23/2011	12/23/2011	12/27/2011

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