

## Comments on Proposed Order for Recommendation 4.2

### Mitigative Strategies

#### Proposed Wording of the Order

The NRC has proposed that the order direct:

Licensees to develop, implement and maintain guidance and strategies to mitigate the effects of challenges to the key safety functions of core cooling, containment, and spent fuel pool cooling capabilities.

During the public meeting on January 18, 2012, the industry proposed wording changes that more closely follows the wording of 10 CFR 50.54(hh)(2) and provided greater clarity to the range of “challenges” that impact the noted key safety functions. The industry proposal for the wording of the order is:

Each licensee shall develop, implement and maintain guidance and strategies intended to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities under the circumstances associated with beyond design-basis external hazards resulting in an extended loss of all AC power or loss of ultimate heat sink capability.

The objective of the strategies developed will be to prevent core damage, loss of containment function and loss of spent fuel pool inventory. As such, the strategies will not address mitigation activities in the event of core damage. The portable equipment obtained and stored onsite or in a regional support center will, however, be available to be used in the event of core damage. The additional portable equipment determined by Recommendation 4.2 to be necessary for each site as part of the strategies developed will provide an additional capability that will be included when the Severe Accident Management Guidelines are revised under Recommendation 8.

#### Proposed Schedule in the Order

The NRC has proposed that the guidance for developing, implementing and maintaining strategies be issued by June 30, 2012. During the discussion with the NRC in the public meeting, further clarification was provided on the scope of the evaluation required for determining the requisite strategies and, therefore, the industry proposed that there be some adjustment to the proposed NRC schedule for guidance development. The industry believes it is important to hold at least one industry/NRC workshop during the public comment period to demonstrate the guidance, as well as obtain further comments on the guidance. As such, the industry proposes the guidance be completed by August 30, 2012, as opposed to June 30, 2012.

It is difficult to establish the implementation schedule for the strategies before the guidance is developed. As such, it is recommended that after licensees perform the evaluation per the approved guidance, that the integrated plan the licensees submit include a schedule for implementation. Full implementation of the strategy may involve plant modifications which typically take up to two refueling outages to implement.