



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, DC 20555 - 0001**

February 15, 2012

Mr. R. W. Borchardt
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: DRAFT 10 CFR 50.54(f) LETTER ON IMPLEMENTATION OF THE NEAR-TERM TASK FORCE RECOMMENDATIONS FROM THE FUKUSHIMA DAIICHI EVENT

Dear Mr. Borchardt:

During the 591st meeting of the Advisory Committee on Reactor Safeguards, February 9-11, 2012, we were briefed by the NRC staff on the status of the implementation of the Near-Term Task Force Recommendations regarding the Fukushima Daiichi accident. We provided comments to the staff during their presentation and discussion.

We understand that the Orders and the 10 CFR 50.54(f) letter are still being revised and will be submitted to the Commission on February 17, 2012. We plan to review the final versions of these documents during our March 2012 meeting.

Our preliminary review of the Draft 10 CFR 50.54(f) letter identified one item that affects the technical scope and consistency of the requested evaluations of seismic risk. Therefore, we draw your attention to that item for consideration before issuance of the final letter. The discussion of requested information under Recommendation 2.1 refers to NUREG/CR-4334, issued in August 1985, and Part 10 of American Society of Mechanical Engineers/American Nuclear Society (ASME/ANS) Standard RA-Sa-2009, as providing acceptable guidance for performance of a Seismic Margin Analysis (SMA) within the context of this request. However, this guidance is not consistent with the "current applicable Commission requirements and guidance" for the updated seismic hazard and vulnerability evaluations as required in the December 23, 2011, Consolidated Appropriations Act, Public Law 112-74, Section 402.

The guidance for performance of an SMA in response to this request should cite Part 5 of ASME/ANS Standard RA-Sa-2009, as endorsed by Interim Staff Guidance (ISG) DC/COL-ISG-020, "Interim Staff Guidance on Implementation of a Probabilistic Risk Assessment-Based Seismic Margin Analysis for New Reactors." The ISG specifically notes that the methods that are described in Part 10 of ASME/ANS Standard RA-Sa-2009 are not acceptable for performing a design-specific SMA for a new reactor.

Sincerely,

/RA/

J. Sam Armijo
Chairman

REFERENCES

1. NRC Memorandum with Enclosures, "Draft 10 CFR 50.54(f) Letters for Implementing Near-Term Task Force Recommendations 2.1, 2.3, and 9.3," January 13, 2012 (ML12013A224)
2. NUREG/CR-4334, "An Approach to the Quantification of Seismic Margins in Nuclear Power Plants," August 1985 (ML090500182)
3. ASME/ANS RA-Sa-2009, "Addenda to ASME/ANS RA-S-2008, Standard for Level 1/ Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," April 2009
4. Consolidated Appropriations Act of 2012, Public Law 112-74
5. Interim Staff Guidance DC/COL-ISG-020, "Implementation of a Probabilistic Risk Assessment-Based Seismic Margin Analysis for New Reactors" (ML100491233)

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Letter to R. W. Borchardt, EDO, from J. Sam Armijo, ACRS Chairman dated February 15, 2012

SUBJECT: Draft 10 CFR 50.54(F) Letter on Implementation of the Near Term Task Force
Recommendations from the Fukushima Daiichi Event

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