

EDO Principal Correspondence Control

FROM: DUE: 03/16/12 EDO CONTROL: G20120101  
DOC DT: 02/15/12  
FINAL REPLY:

J. Sam Armijo, ACRS

TO:

Borchardt, EDO

FOR SIGNATURE OF :

\*\* GRN \*\*

CRC NO:

Borchardt, EDO

DESC:

ROUTING:

Draft 10 CFR 50.54(f) Letter on Implementation of  
the Near-Term Task Force Recommendations from the  
Fukushima Daiichi Event (EDATS: OEDO-2012-0088)

Borchardt  
Weber  
Virgilio  
Ash  
Mamish  
OGC/GC  
Kotzalas, OEDO

DATE: 02/16/12

ASSIGNED TO:

CONTACT:

NRR

Leeds

SPECIAL INSTRUCTIONS OR REMARKS:

Please prepare response to ACRS for the signature  
of the EDO. Add the Commission and SECY as cc's.  
Also, include: RidsAcrsAcnw\_MailCTR to your  
distribution list on the concurrence page. USE  
SUBJECT LINE IN RESPONSE.

Template: EDO-001

E-RIDS: EDO-01

**EDATS Number:** OEDO-2012-0088

**Source:** OEDO

## General Information

**Assigned To:** NRR

**OEDO Due Date:** 3/16/2012 11:00 PM

**Other Assignees:**

**SECY Due Date:** NONE

**Subject:** Draft 10 CFR 50.54(f) Letter on Implementation of the Near-Term Task Force Recommendations from the Fukushima Daiichi Event

**Description:**

**CC Routing:** NONE

**ADAMS Accession Numbers - Incoming:** NONE

**Response/Package:** NONE

## Other Information

**Cross Reference Number:** G20120101

**Staff Initiated:** NO

**Related Task:**

**Recurring Item:** NO

**File Routing:** EDATS

**Agency Lesson Learned:** NO

**OEDO Monthly Report Item:** NO

## Process Information

**Action Type:** Letter

**Priority:** Medium

**Sensitivity:** None

**Signature Level:** EDO

**Urgency:** NO

**Approval Level:** No Approval Required

**OEDO Concurrence:** NO

**OCM Concurrence:** NO

**OCA Concurrence:** NO

**Special Instructions:** Please prepare response to ACRS for the signature of the EDO. Add the Commission and SECY as cc's. Also, include: RidsAcrsAcnw\_MailCTR to your distribution list on the concurrence page. USE SUBJECT LINE IN RESPONSE.

## Document Information

**Originator Name:** J. Sam Armijo

**Date of Incoming:** 2/15/2012

**Originating Organization:** ACRS

**Document Received by OEDO Date:** 2/16/2012

**Addressee:** R. W. Borchardt, EDO

**Date Response Requested by Originator:** NONE

**Incoming Task Received:** Letter



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 591<sup>st</sup> 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)