

July 6, 2012

Dr. J. Sam Armijo, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: DISPOSITION OF THE ADVISORY COMMITTEE ON REACTOR
SAFEGUARDS' REVIEW OF PROPOSED ORDERS IN RESPONSE TO
FUKUSHIMA LESSONS LEARNED (SECY-12-0025)

Dear Dr. Armijo:

On behalf of the U.S. Nuclear Regulatory Commission, I am responding to the Advisory Committee on Reactor Safeguards (ACRS) letter dated March 14, 2012, in which the ACRS recommended that the staff clarify and/or reevaluate the five actions associated with the orders that the staff issued on March 12, 2012. The NRC staff's review and evaluation of your recommendations is contained in the enclosure.

The Commission appreciates the comments and recommendations ACRS provided and looks forward to continuing to work with the Committee in the future. The agency recognizes the need for timely action on all of the Fukushima-related actions and will update you further when the implementation guidance associated with the issued orders has been completed.

Sincerely,

/RA/

Gregory B. Jaczko

Enclosure:
As stated

cc: Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
SECY

NRC STAFF RESPONSES TO RECOMMENDATIONS ON THE PROPOSED ORDERS
IN RESPONSE TO FUKUSHIMA LESSONS LEARNED

On March 14, 2012, the Advisory Committee on Reactor Safeguards (ACRS) submitted a letter to the Honorable Gregory B. Jaczko including conclusions and recommendations from the ACRS's review of the proposed orders in response to the Fukushima lessons learned.

The Nuclear Regulatory Commission staff reviewed the ACRS's recommendations and has dispositioned them as follows:

1. The staff plans to provide clarity concerning the prescribed venting capacity equivalent to 1% of licensed/rated thermal power in the implementing guidance that is currently being drafted associated with the order on hardened containment venting systems (HCVS) for BWRs with Mark I and Mark II containments.
2. The staff plans to treat HCVS in a similar manner as other plant systems if the seismic, flooding, and other natural external hazards reevaluations (performed under Near-Term Task Force (NTTF) Recommendation 2.1) were to show the current design basis of the plant to be non-bounding. This will be addressed in the implementing guidance that is currently being drafted.
3. The staff plans to provide clarity concerning a licensee's need to modify its procedures associated with the use of instrumentation for response to abnormal spent fuel pool level conditions in the implementing guidance that is currently being drafted for the order on spent fuel pool instrumentation.
4. The staff will continue to engage with industry on its proposed "FLEX" approach to ensure that it is responsive to the order on mitigation strategies for beyond-design-basis external events.
5. The staff will provide clarity concerning a licensee's need to modify its procedures, guidance, and training requirements in all of the future regulatory activities performed associated with NTTF Recommendation 8.

Enclosure