

May 31, 2012

Mr. Adrian P. Heymer, Executive Director
Strategic Programs
Nuclear Energy Institute
1776 I St NW, Suite 400
Washington, DC 20006-3708

SUBJECT: ENDORSEMENT OF NUCLEAR ENERGY INSTITUTE (NEI) 12-07,
“GUIDELINES FOR PERFORMING VERIFICATION WALKDOWNS OF PLANT
FLOOD PROTECTION FEATURES”

Dear Mr. Heymer:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter of May 21, 2012, which requested NRC’s endorsement of [Nuclear Energy Institute] NEI 12-07,¹ “Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features.” NEI 12-07 was submitted to support licensee responses to Enclosure 4 of the March 12, 2012, information request² that was issued pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f). The 10 CFR 50.54(f) letter was issued in the course of implementing the lessons learned from the accident at the Fukushima Dai-ichi nuclear facility. The NRC staff would like to acknowledge that NEI 12-07 was the product of significant interactions between the NRC, NEI, and other stakeholders at numerous public meetings. These interactions and the insights gained from them allowed for the development of this document in a short time frame.

The NRC staff confirmed that the guidance directs the licensee to perform the walkdowns in a manner that will address the Requested Information items 1.a through 1.j in the 10 CFR 50.54(f) letter. Additionally, the NRC staff finds that Appendix D, “Walkdown Report,” of NEI 12-07 delineates the appropriate information to be submitted in response to Requested Information items 2.a through 2.h. of the 50.54(f) letter.

With respect to requested information item 2.a, which requested a description of the design basis flood hazard level(s) for all flood-causing mechanisms, it is anticipated that some licensees may have reason to perform the walkdown using a different flood level than is currently on record with the NRC. For example, a licensee may have recently revised a design basis under 10 CFR 50.59 and not yet reported it pursuant to 10 CFR 50.71(e). Alternately, a licensee may be contemplating an amendment to revise a design basis pursuant to

¹ NEI 12-07 is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML121440522.

² The 50.54(f) letter is available in ADAMS under Accession No. ML12053A340.

A. Heymer

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10 CFR 50.90. For these situations, licensees are requested to engage with the NRC before conducting the walkdowns to ensure understanding of the design and licensing basis and, if necessary, determine the appropriate flood hazard to be considered. Licensees should contact their assigned plant project manager to initiate these discussions.

As described above, the NRC staff has reviewed the guidance contained in NEI 12-07 and finds that performance and reporting of flooding protection walkdowns in accordance with this document would be responsive to the 10 CFR 50.54(f) letter. During the May 22, 2012, Advisory Committee on Reactor Safeguards meeting, two suggestions were received that the NRC staff considers necessary for this endorsement and should be incorporated in NEI 12-07. These changes are included in Enclosure 1 to this document. Additionally, the NRC staff did note some minor errors in the document that appear to have been introduced in the final revision. These errors do not affect the substantive content, but are included in Enclosure 2 to this document for your consideration.

The NRC requests that NEI publish an accepted version of NEI 12-07 within one month of receipt of this letter. The accepted version shall make the necessary changes in Enclosure 1, incorporate this letter between the title page and the first section, and add a "-A" (designating accepted) following the report identification number. If you, or your staff, have additional questions, please contact myself or Mr. G. Edward Miller at 301-415-2481, or by email at ed.miller@nrc.gov.

Sincerely,

/RA/

David L. Skeen, Director
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc: E. Leeds
G. Tracy
G. Holahan
R. Taylor

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Enclosure:
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cc: E. Leeds
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*Concurrence via e-mail

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| OFFICE | NRR/JLD/PMB | NRR/DORL | NRO/DSEA/RHMB | NRR/JLD/PMB |
| NAME | EMiller | SRohrer | PChaput* | RPascarelli |
| DATE | 05/30/2012 | 05/30/2012 | 05/29/2012 | 05/30/2012 |
| OFFICE | NRR/DSEA/RGS2 | OGC | NRO/DESA | NRR/JLD |
| NAME | CCook | MSpencer (NLO)* | NChokshi* | DSkeen |
| DATE | 05/25/2012 | 05/25/2012 | 05/26/2012 | 05/31/2012 |

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Necessary Changes to NEI 12-07

Based Upon the ACRS Meeting on May 22, 2012

- 1) Add extreme air temperature to the list of examples of adverse weather conditions that could reasonably be expected to simultaneously occur in the following areas:
 - Page 6, Section 3.10, Last Bullet
 - Page 18, Section 5.7, First Paragraph
 - Page 18, Section 5.7, First Bullet

- 2) Include a citation reference to NUREG-1852, "Demonstrating the Feasibility and Reliability of Operator Manual Actions in Response to Fire," as an additional information source that licensees may consider when evaluating operator manual actions.

Suggested Corrections to NEI 12-07

- 1) Page 14, Section 5.5.1, a bullet for “Procedure Walk-Through and Reasonable Simulation” should be added to the list to correspond to the sections 5.5.2 through 5.5.6 described previously.
- 2) Page 19, Section 5.8, the first sentence applies to Parts C and D of the Walkdown Report, however, only Part C is listed.
- 3) Page 35, Part B.3, Both the sections Procedure Walk-Through and Reasonable Simulations are listed, however, only section 5.7 is listed in the parenthesis. Section 5.5.6 should also be listed for consistency.
- 4) Page 35, Part B.3, Question 5, ensuring that the information in Part D is documented would be done if the answer is yes while an explanation would be needed for a negative response.
- 5) Page 37, Part C, Question 7, due to renumbering of sections, the reference should refer to section 5.1 and 5.10.