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Subject: Flood Reevaluation Inquiry Process Rev b.doc
Date: Thursday, May 31, 2012 3:20:15 PM
Attachments: [Flood Reevaluation Inquiry Process Rev b.doc](#)

Chris, Ed;

During our phone call on May 29th we discussed developing a method and tracking system for processing inquiries about existing flood hazard evaluation guidance. I have drafted an approach and included it as an attachment to this message. You will note that I broadened the scope to include inquiries on the walkdown guidance too.

I would like to reach agreement on this approach as soon as possible and therefore would like to include a discussion of any comments you may have at our next meeting or phone call. Please send me any comments on this guidance in advance of our meeting if possible.

Thank you,



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Flooding Evaluation and Walkdown Guidance Inquiry Process

Purpose

The purpose of this guidance is to facilitate the consistent application of the existing guidance for flood hazard evaluations and flooding design basis walkdowns. This guidance describes the process for identifying, tracking, and dispositioning questions regarding interpretation of the existing guidance. The primary sources of guidance are listed in the reference section below.

Method

The inquiry resolutions developed by this process are one acceptable method of addressing the issue in question; there may be other equally acceptable approaches. These inquiry resolutions are not binding. As inquiries are completed, it is not the intent of this process to require backfit of the information into completed activities.

1. Inquiries should be sent to NEI (jhr@nei.org) using Attachment 3 (Inquiry Form) to this document. The individual initiating the question must identify the issue and describe the question by completing sections A, B, and C of the form.
2. The NEI Fukushima Flooding Task Force (FFTF) will determine if the inquiry needs to be processed in accordance with this guidance or if an immediate response to the initiator is sufficient.
 - a. If an immediate response to the initiator is sufficient, inform the initiator of the resolution and post the response to the NEI website if it has generic interest. The remainder of this guidance is not applicable.
 - b. If the inquiry needs to be processed in accordance with this guidance, enter and maintain the status of the inquiry in the Inquiry Status Table (Attachment 2) and proceed with the steps below.
3. The FFTF will develop a proposed resolution to the inquiry. The resolution should include a description of the position, justification, and, if necessary, any required follow-up activities. Document the resolution in section D of Attachment 3.
4. The FFTF will make an initial determination of whether NRC approval or endorsement of the inquiry is necessary. Document this decision and explain its basis in section E of the form.
5. If NRC endorsement of the inquiry is believed to not be necessary, once the FFTF has agreed on the resolution:
 - a. Indicate the method by which the FFTF approved the inquiry (e.g., meeting on a specific date) in section F.
 - b. Inform the NRC of the completed inquiry.
 - i. If the NRC agrees that there is no need to obtain their endorsement,
 1. Indicate this by entering "N/A" in section G of Attachment 3

Flooding Evaluation and Walkdown Guidance Inquiry Process

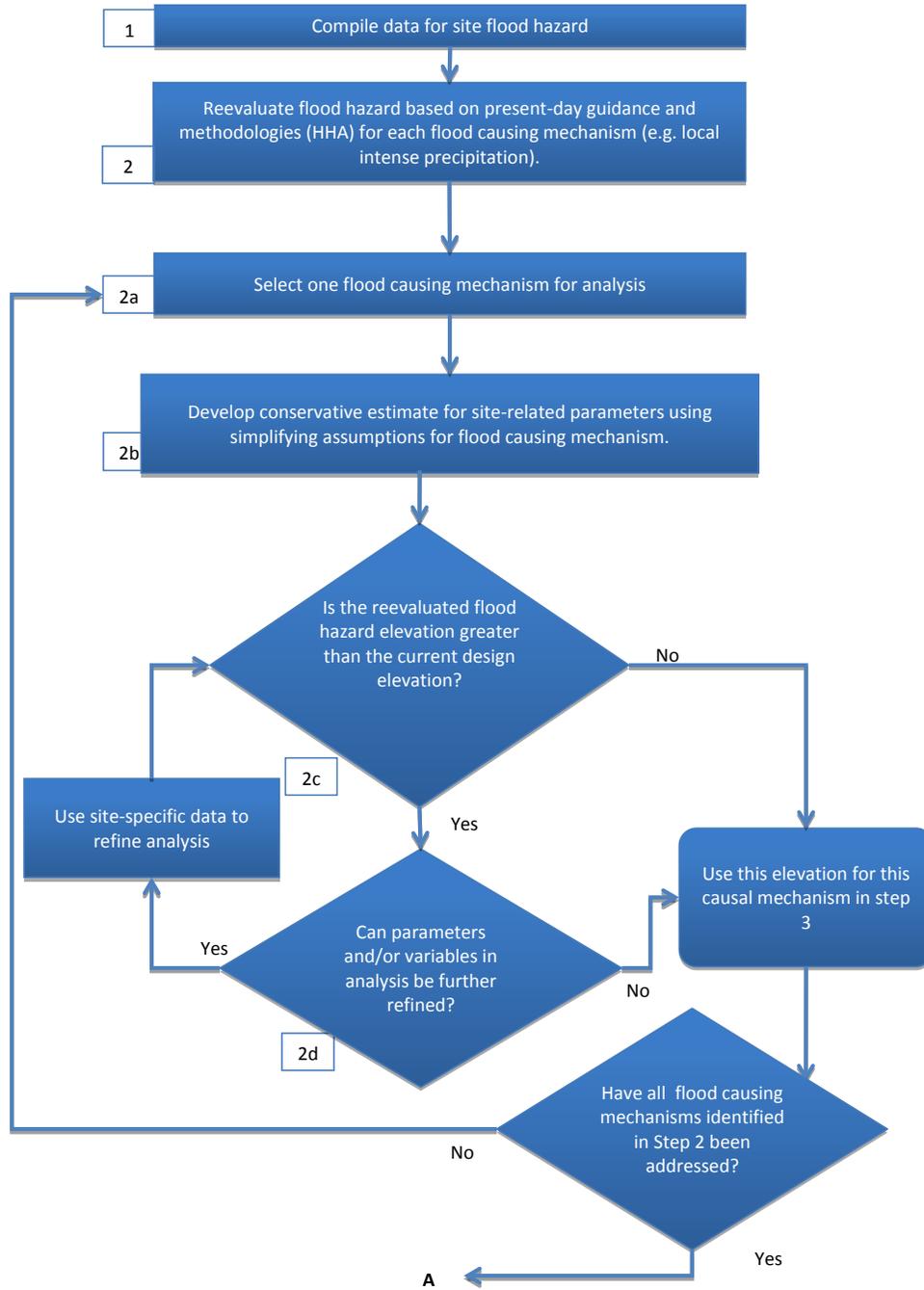
2. Post the completed inquiry on the NEI Fukushima web site
3. Close out the Inquiry Status Table entry. The remainder of this guidance is not applicable.
 - ii. If the NRC disagrees with the decision on their endorsement, continue the process at the next step.
6. If NRC endorsement of the inquiry is necessary, once the FFTF has agreed with the proposed resolution:
 - a. Indicate in section E of Attachment 3 whether the inquiry is an "Interpretation" or "Agency Position" (different methods of documenting approval will apply).
 - b. Discuss the inquiry and resolution with the NRC at one or more meetings as necessary. Revise the resolution in section D as appropriate until industry and NRC agree on the resolution.
 - c. Obtain documentation of NRC endorsement (e.g., attachment of the completed Inquiry Form to a meeting summary, NRC letter, etc.)
 - d. Indicate the method by which the FFTF and NRC approved the inquiry (e.g., meeting on a specific date, letter number, etc.) in sections F and G.
 - e. Post the completed inquiry on the NEI Fukushima web site
 - f. Close out the Inquiry Status Table entry.

References:

1. NEI 12-07, Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features, Rev 0
2. NUREG/CR-7046, PNNL-20091, "Design-Basis Flood Estimation for Site Characterization at Nuclear Power Plants in the United States of America." ML11321A195, November 2011.
3. U.S. Nuclear Regulatory Commission (NRC), Regulatory Guide 1.59, Rev. 2, Design Basis Flood for Nuclear Power Plants, 1977.
4. U.S. Nuclear Regulatory Commission (NRC), Regulatory Guide 1.102, Rev. 1, Flood Protection for Nuclear Power Plants, 1976.
5. American Nuclear Society (ANS) Standard ANS 2.8, American National Standard for Determining Design Basis Flooding at Power Reactor Sites, 1992.
6. NUREG/CR-6966, Tsunami Hazard Assessment at Nuclear Power Plant Sites in the United States of America, 2009.

Attachment 1:

Evaluation Process Flow Chart



Revision b

Attachment 1: Evaluation Process Flow Chart

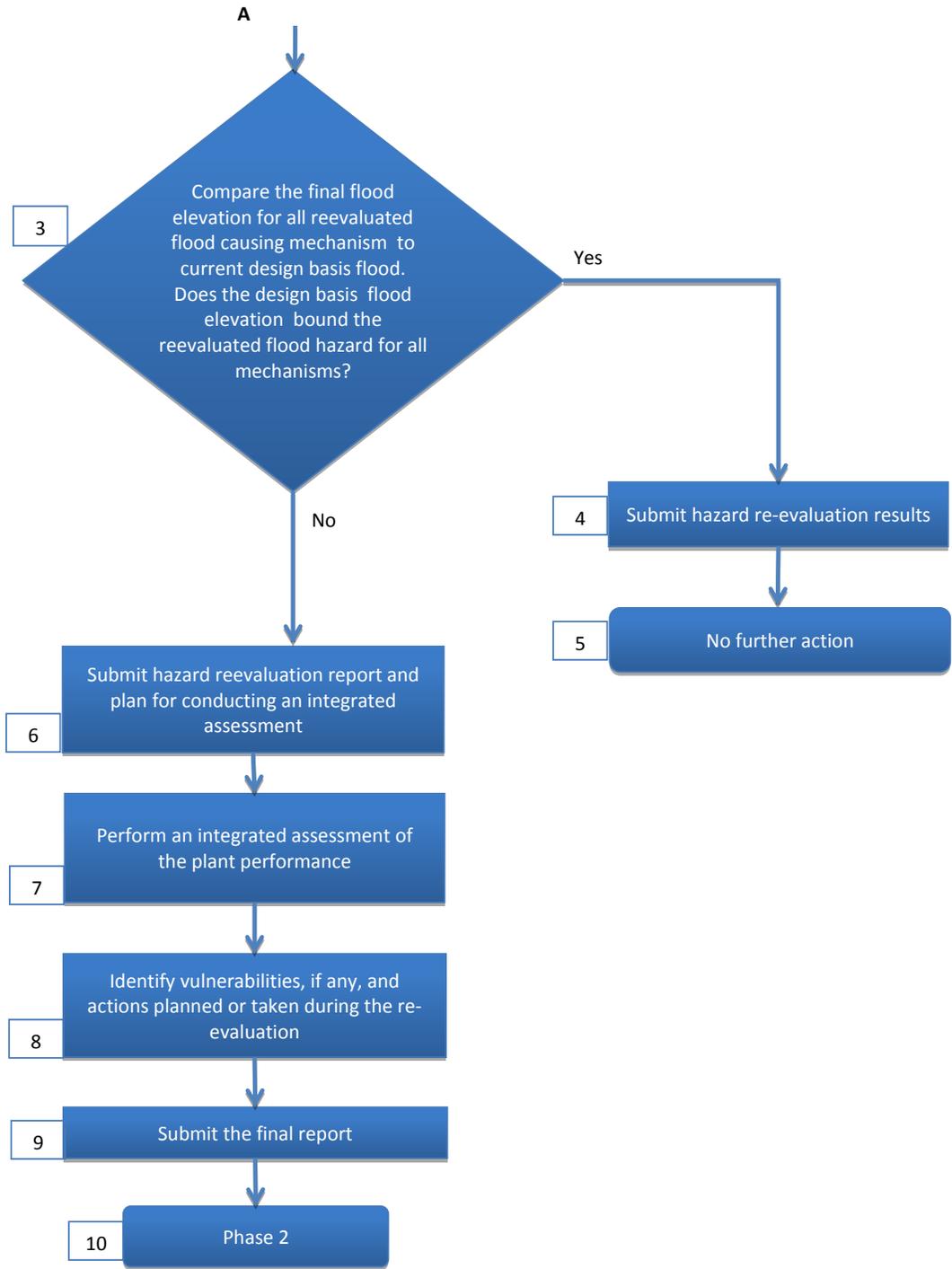


Figure 1. Development of Requested Information and Its Use in Regulatory Analysis. Page 2 of 2

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