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EXECUTIVE DIRECTOR
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June 8, 2012

Mr. David L. Skeen
Director
Japan Lessons Learned Project Directorate
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on NRC Tier 3 Recommendations on Lessons Learned from the Accidents at Fukushima Daiichi Nuclear Power Plant in Japan Containment Vents

Project Code: 689

Dear Mr. Skeen:

The Nuclear Energy Institute (NEI¹) appreciates the opportunity to provide comments on the Nuclear Regulatory Commission's Tier 3 recommendations on the lessons learned from the reactor accidents at the Fukushima Dai-ichi nuclear power station in Japan.

General Comments

The NRC appropriately prioritized the recommendations of the NRC Fukushima Near-Term Task Force, the NRC Advisory Committee on Reactor Safeguards and members of the public. The industry agrees with the items that the NRC determined should be pursued without delay, categorized as Tier 1. Preliminary industry assessments indicate that the Tier 1 items, when completed, will achieve as much as 90 percent of the safety benefit from all recommendations.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

At this time, the safety benefits derived from proceeding with implementation of the Tier 2 or Tier 3 recommendations are unclear. The implementation of Tier 1 items may address Tier 2 or Tier 3 issues. Once the path forward on the Tier 1 items is clear and implementation plans have been approved, better assessments of the benefits of proceeding with Tier 2 and Tier 3 can be made. At that time, the safety benefits of Tier 1 will be known and the significance of the Tier 2 and Tier 3 actions can be better assessed.

Neither the industry nor the NRC has infinite financial or staffing resources. The industry has mobilized its resources to focus on implementing Tier 1 recommendations—those actions that will provide the greatest safety benefit. The industry's resources are fully committed to implementing Tier 1. While the industry understands the need for planning, it does not support nor does it have the resource capability to start work on non-Tier 1 activities before the Tier 1 scope and implementation details are reviewed and approved. To do so, will jeopardize Tier 1 schedules by diverting industry and NRC resources and management focus away from those actions that provide the greatest safety benefit.

The need for pursuing Tier 2, Tier 3 and any other issues identified at a later date should be based on the following principles:

- Direct linkage with the progression of the accident at Fukushima Dai-ichi
- The defined safety benefit and safety significance based on holistic risk-informed insights, taking into account the safety benefit from implementing Tier 1 actions
- Direct applicability to U.S. plants, taking into account differences from Japanese plants in design, training and plant management practices, including severe accident management guidelines, plant procedures and work practices.

Tier 3 issues should not be evaluated in isolation from other Fukushima-related issues. An integrated assessment that includes the benefits of implementing Tier 1 actions should be performed before reaching a decision on whether to proceed with implementing any Tier 3 recommendations. There are numerous options and holistic risk-informed assessments should be used, focusing first on those that have the greatest safety benefit.

Detailed Comments

The attachment to this letter provides the industry's detailed comments on the Tier 3 recommendations.

The industry remains committed to implementing the lessons learned from the Fukushima accidents that will further enhance safety and the protection of public health and the environment.

Mr. David L. Skeen

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Please contact me at 202.739.8094; aph@nei.org, if you have questions pertaining to these comments.

Sincerely,

A handwritten signature in black ink that reads "A.P. Heymer". The signature is written in a cursive style with a horizontal line under the name.

Adrian P. Heymer

Attachment

c: Mr. John D. Monninger, NRR/JLD, NRC
NRC Document Control Desk