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June 18, 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: NRC Endorsement of NEI 12-07, *Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features*

Reference: NRC (D. Skeen) Letter to NEI (A. Heymer), dated May 31, 2012, "Endorsement of Nuclear Energy Institute (NEI) 12-07, 'Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features'"

Project Number: 689

Dear Mr. Skeen:

The referenced letter endorsed Revision 0 of NEI 12-07, *Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features*, yet noted several comments and recommendations for amendment. The guideline has been revised to incorporate the NRC comments and editorial changes. A copy of the revised guideline, NEI 12-07, Rev. 0-A, *Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features*, is attached with changes denoted by sidebars. The revisions are not substantive and are:

- Page 14, section 5.5.1, second sentence: changed "four" sections to "five" sections to align with the number of bullets that follow the paragraph.
- Page 27, example A.1.2, eighth bullet: deleted the reference to the "note below." This note was removed in a previous revision during development of the document.
- Page 29, example A.2.1: two bullets containing guidance for inspecting doors were inadvertently omitted when the revision 0 document was created; the bullets that have been put back into the revision "0-A" document are the following:
 - "Perform an external visual inspection of doors for indications of degradation that would prevent satisfactory performance of the flood protection function of the door.

Mr. David L. Skeen

June 18, 2012

Page 2

Conditions that should be recorded include (but are not limited to) severe corrosion, missing fittings, missing fasteners, undocumented holes or openings, damaged jams or seals, obstructions, etc.

- "Confirm that the doors are closed (or can be closed) and have the proper door swing (i.e., swing in the direction shown on design drawings)."
- Page 30, example A.2.1.1: corrected a typographical error in the third bullet ("Door are seals in place..." was changed to "Door seals are in place...").
- Page 36, Appendix B, Summary of Findings: deleted the phrase "Part F is recommended anytime Part C is applicable." In accordance with a decision reached during our May 16, 2012 meeting, Part F (Walkdown Enhancements) of Appendix B was removed prior to submitting the document for NRC endorsement.

The industry appreciated the very constructive public meetings on the walkdown guidance. We look forward to the same level of constructive engagement on the questions and issues that may arise during the walkdowns, the development of the re-evaluated flooding hazards and the Integrated Assessment Guidance. Please contact Jim Riley (202-739-8137; jhr@nei.org) or me if you have any questions on this letter.

Sincerely,



Adrian P. Heymer

Attachment