

Spent Fuel Pool Instrumentation Order Draft Interim Staff Guidance

June 21, 2012

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Project Manager

Japan Lessons Learned Project Directorate

Topic Agenda

- Order EA-12-051
- NEI 12-02, Revision B
- Draft JLD-ISG-12-03
- Request for Hearing

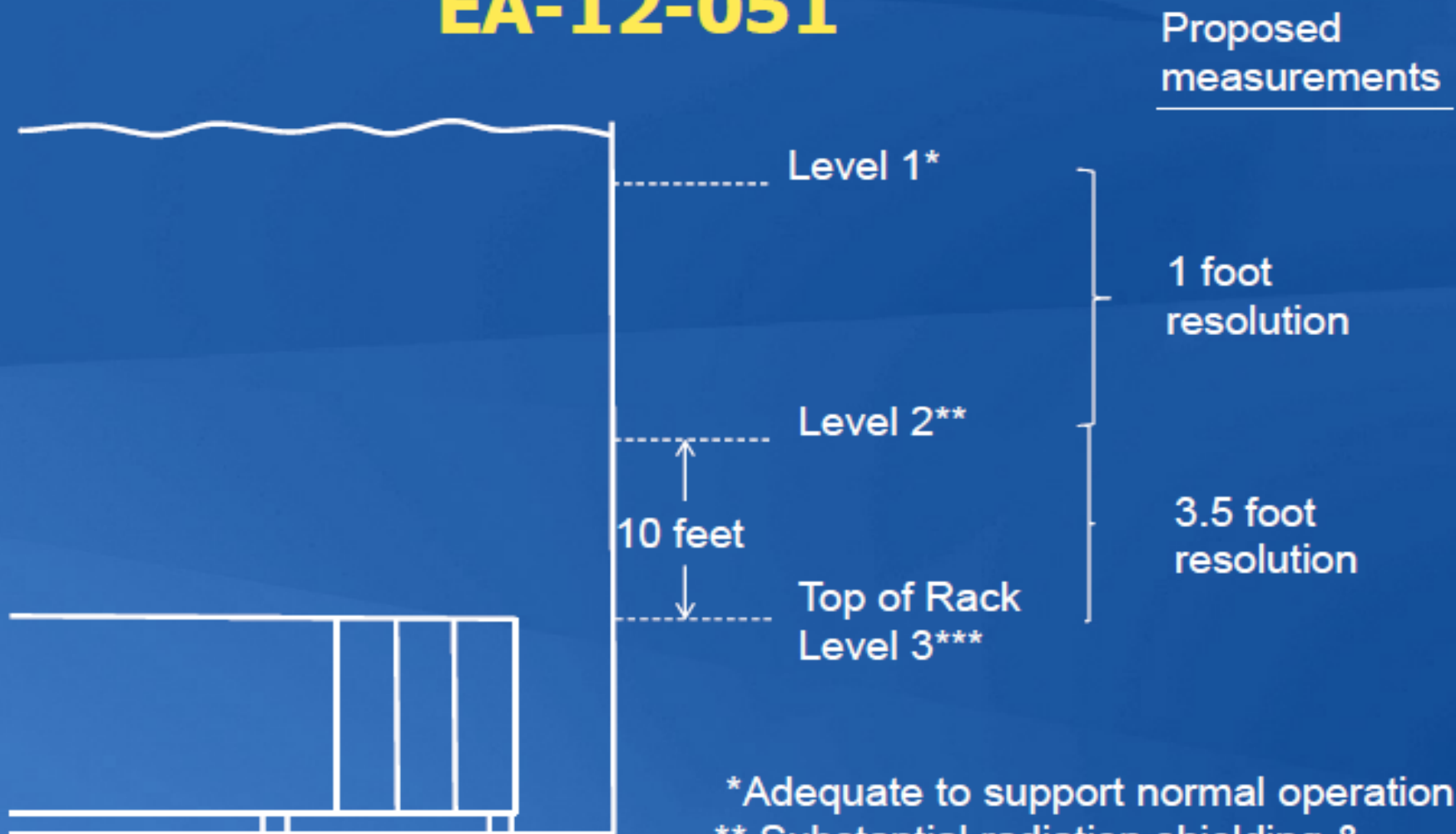
Order EA-12-051

- SRM-SECY-11-0137
- SRM-SECY-12-0025
- Bases for Administrative Exemption
 - unprecedented initiating cause and failure sequence
 - exceptional circumstances
 - need to enhance the knowledge of key decision makers to support effective resource allocation for severe external events
 - represents a significant enhancement to protection of public health and safety

NRC Instrumentation Criteria

Criteria	NRC Plan
Instruments	<ul style="list-style-type: none"> • Permanent fixed primary level instrument • Backup level instrument (portable or fixed)
Monitoring Availability	<ul style="list-style-type: none"> • Continuously available, indication on-demand • Calibration maintained through power interruption
Display Locations	<ul style="list-style-type: none"> • Control Room, Alternate Shutdown Panel, or other • Portable device usable from accessible location
Supports Prompt Identification of these Pool Conditions	<ul style="list-style-type: none"> • Level adequate for operation of forced cooling • Level threatening access – inadequate shielding • Level at just above top of stored fuel
Qualification	<ul style="list-style-type: none"> • Augmented quality (e.g., fire protection QA) • Optimize missile protection using existing structures • Seismic Category I mounting of equipment • Demonstrated to function in harsh environment • Equipment resistant to radiation and vibration
Power Supply	<ul style="list-style-type: none"> • Non-safety power plus alternate (battery replacement or external power connection)

Level Indications EA-12-051



- *Adequate to support normal operation
- ** Substantial radiation shielding &
- ***Actions to implement makeup water should no longer be deferred.

NEI 12-02 Guidance Document

- NEI 12-02, Revision B, submitted on May 11 for NRC review and endorsement
- Instrument Design Features
- Program Features

NEI 12-02 Design Features

- General
 - available until off-site resources stabilize SFP
- Back-up Channel features
 - may be fixed, portable, or a combination
 - wireless technology allowed
 - Deployment within 60 minutes, 2 trained operators
- Arrangement
- Mounting
- Qualification

NEI 12-02 Design Features

- Independence
- Accuracy
- Display
- Program Features
- Testing and Calibration

Draft JLD-ISG-2012-03

Endorsement of NEI-12-02 with exceptions:

- Specify that instruments must be able to resist beyond design basis external events
- More explicit discussion on differences between resolution and accuracy
- Modify guidance used to establish Level 2 (dose rates limit access to pool deck)
- Specified that level readings are to be available when required / promptly accessible
- Provided detailed integrated plan template

Request for Hearing

- Pilgrim Watch filed a request for hearing on April 2, 2012, challenging the adequacy of the Order.
- Contention claims that the Order is insufficient because it does not require licensees to:
 - lower the capacity of SFPs
 - use open frame designs
 - remove fuel that is 5 years and older to dry casks
- Oral arguments on the issues of standing and contention admissibility held June 7

How to Submit Comments

- ✓ **By mail** please reference Spent Fuel Pool ISG

Ms. Cindy Bladey

Chief, Rules, Announcements, and Directives Branch (RADB)

Office of Administration, Mail stop: TWB-05-B01M

US Nuclear Regulatory Commission

Washington, DC 20555-0001

- ✓ **Online** using the Federal Rulemaking Web Site:

At <http://www.regulations.gov>

Enter Keyword or ID:

- ✓ **Fax** please reference Spent Fuel Pool ISG

RADB at **301-492-3446**

Comments must be submitted by July 7

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Instrumentation Order
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June 20, 2012

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Other exceptions

- Clarifications
- Protection