



**ANPR 50 and 52
(77FR23161)**

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Program Management Office
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Cranberry Township, PA 16066

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June 18, 2012

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Project Number 694

OG-12-241

**OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF**

Ms. Annette L. Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemakings and Adjudications Staff

**Subject: Docket ID NRC-2012-031; 10 CFR Part 50 and 52, Onsite Emergency
Response Capabilities; Advance Notice of Proposed Rulemaking
(77 Fed. Reg. 23161) (PA-SC-0933R1)**

- Reference:**
- (1) Docket ID NRC-2012-031; 10 CFR Part 50 and 52, Onsite Emergency Response Capabilities; Advance Notice of Proposed Rulemaking (77 Fed. Reg. 23161)
 - (2) Nuclear Energy Institute (NEI) Submittal Letter, dated June 18, 2012

Dear Ms. Vietti-Cook:

The Pressurized Water Reactors Owners Group (PWROG) submits the following comments on the subject advance notice of proposed rulemaking (ANPR) regarding onsite emergency response capabilities (reference 1). The PWROG has decades of experience in this subject, and has established substantial capability for severe accident mitigation, as well as its integration with the overall emergency response structure. We welcome the opportunity to respond to this ANPR.

The PWROG was a contributor to the comments submitted by the Nuclear Energy Institute (NEI) on this subject and completely endorses those comments (reference 2).

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The PWROG would especially like to comment that we are currently sponsoring the development of generic enhancements to the onsite emergency response capabilities of pressurized water reactors (PWRs) to: 1) maintain core cooling for beyond design basis events that could result in an extended loss of a.c. power, and 2) to mitigate the consequences of beyond design basis accidents that proceed to core damage. Both of these activities are being conducted in concert with the larger industry efforts described in the NEI comment letter on this subject ANPR. It is also important to note that these PWROG efforts include the coordination activities required to produce an effective and seamless emergency response capability that include clear interfaces between separate emergency response programs, validate procedures and guidance, and training and exercises. All of the PWROG efforts are being developed by subject matter experts from utilities as well as the nuclear reactor vendors.

Finally, the PWROG would like to express support for the continuation of the subject rulemaking on this subject that would result in a high level regulation (e.g., a new line item in 10 CFR 50.54 (hh)) that would include the attendant regulatory guides and inspection procedures. The PWROG believes that effective regulatory oversight of this area begins with clear and understandable regulatory requirements. The rulemaking process would provide the opportunity for the stakeholders to provide input to the new rule and accompanying guidance to ensure that the regulatory requirements are clear and are able to be implemented in a manner that produces the desired result.

We look forward to being involved in the public process regarding this important rulemaking. If you have any questions regarding these comments, please contact me at (205.992.7037; njstring@southernco.com).

Sincerely,



N. Jack Stringfellow, Interim Chairman
PWR Owners Group

NJS:rfn

cc: PWROG Executive Management Group
PWROG Management Committee
PWROG PMO
PWROG Steering Committee
PWROG Licensing Subcommittee
PWROG Risk Management Subcommittee
PWROG Procedures Subcommittee
D. Olinski, Westinghouse
J. Gresham, Westinghouse
B. Schomaker, Areva
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