

Mitigation Strategies Order Interim Staff Guidance

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July 26, 2012

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Meeting Purpose

- Provide stakeholders with the NRC staff's assessment of NEI 12-06 and our Interim Staff Guidance (ISG) -2012-01.
- Afford stakeholders an opportunity to ask the NRC staff questions to clarify ISG.

Topic Agenda

- Background
- NEI 12-06 Guidance
- JLD ISG-12-01

Background – Order EA-12-049

- In SRM-SECY-11-0137, the Commission directed the staff to take certain actions related to SBO mitigation capabilities.
 - Supported the NTF recommendation to pursue an Order to provide reasonable protection for equipment provided pursuant to 10 CFR 50.54(hh)(2) from the effects of design-basis external events and to add equipment as needed to address multiunit events.
- The Steering Committee revised the direction of the recommendation to have licensees develop mitigation strategies for beyond-design-basis external events.

Background – Order EA-12-049

- Order EA-12-049, required that licensees develop a three-phase approach for mitigating beyond-design-basis external events to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities
 - Initial phase - installed equipment and resources
 - Transition phase - sufficient, portable onsite equipment and consumables
 - Final phase – sufficient offsite resources to sustain functions indefinitely
- SECY-12-0025 approved the issuance of the Order on Mitigation Strategies for Beyond-Design-Basis External Events
- Mitigation Strategies Order issued March 12, 2012

NEI 12-06 Guidance Document

- On May 4, NEI submitted for NRC review and endorsement NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision B
- On May 13, NEI submitted Revision B1, following a public meeting with the NRC
- On July 3, NEI submitted Revision C, in response to request for public comments
- On July 25, NEI submitted Revision C1

JLD-ISG-12-01 Overview

- Draft JLD-ISG-2012-01 proposed to endorse, with some exceptions and clarifications, NEI 12-06, Revision C
- Conforming changes to NEI 12-06, Revision C1, adopted many of the exceptions and clarification of the ISG

1.0 Evaluation of External Hazards

- NEI 12-06, Appendix B internally inconsistent with treatment of natural phenomena. Discussion in text and results of screening seem logical and may be endorsed.

2.0 Phased Approach

Duration guidance for initial response phase needs further discussion.

3.0 Core Cooling Strategies

3.1 Removal of Decay Heat

- NEI 12-06, Revision C1, section 3.2.1.1 discussion of beyond-design-basis analysis is out of scope
 1. Final sentence of final paragraph may be endorseable if reworded.

N + 1 for FLEX equipment

- ACRS Comment on use of multi-function, multi-unit pump (NEI 12-06 page 28)

ANS Proposal for Consensus Standards

- NRC views the use of consensus standards as beneficial

Appendix F for AP1000 Design

Table F.3.2-1 Notes describe multiple connection points for FLEX electric generator, these points must be determined not to be susceptible to a common failure mechanism. Also the instruments must include portable measurement equipment and power supplies