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

Dear Sir:

SUBJECT: Response to Press Release No. 12-064, "NRC Seeks Comment On Draft Guidance Documents Regarding Post-Fukushima Requirements" [Docket ID NRC-2012-0067]

The American Nuclear Society (ANS) appreciates the opportunity to offer comments regarding guidance being proposed to implement requirements involved in the three Orders and the 10 CFR 50.54(f) letter referred to in the subject press release. The NRC is issuing the additional guidance to support the regulatory review of actions taken by U.S. commercial nuclear power plants responding to requirements deemed necessary as a consequence of information emanating from the Japanese earthquake, tsunami, and plant damage at four Fukushima Dai-ichi units.

The ANS is the premier U.S. technical society and Standards Development Organization (SDO) that is responsible to the nuclear industry for consensus standards on siting, design, operations, analytic computations, emergency preparedness, decommissioning and remediation, and spent fuel and waste management. ANS is dedicated to all aspects of nuclear technology and is keenly interested in advancing the cause of nuclear safety by bringing the knowledge made available from the Fukushima accidents into its various activities. The Standards Committee of the ANS in particular, through the efforts of its volunteer experts in developing national consensus standards, can improve the effectiveness of NRC endeavors in learning the lessons from Fukushima.

The Orders and letter issued by the NRC for post-Fukushima evaluations were subsequently supported by NRC Draft Guidance Documents. The nuclear industry also developed four documents as implementation guidance as follows:

1. A Nuclear Energy Institute (NEI) document on diverse and flexible coping strategies in the context of Fukushima-like events (NEI 12-06),
2. A NEI document that supports the mandates on reliable spent fuel pool instrumentation (NEI 12-02 [Revision B]),
3. A NEI document on performing walkdowns to verify plant flood protection features (NEI 12-07 [Rev. 0]), and
4. An Electric Power Research Institute (EPRI) document that provides guidance on seismic walkdowns (EPRI Draft Report 1025286).

In response to the subject invitation to comment on the proposed staff review guidance, the ANS recommends that the NRC give high priority to enabling appropriate nuclear SDOs to convert the technical content of the above mentioned industry documents into national consensus standards. An appropriate platform to pursue such an action would be the Nuclear Energy Standards Coordination Collaborative (NESCC), of which NRC is a member. The NESCC is co-chaired by the National Institute of Standards and Technology and the American National Standards Institute (ANSI). The NRC has supported the NESCC pursuant to national and policy objectives and has frequently voiced support for consensus standards as a

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means of improving the robustness of regulatory documents. It is mentioned in the documents referenced in the subject press release that the interim staff guidance could be converted to more durable regulatory documents such as Regulatory Guides or Standard Review Plan sections. Hence, future regulatory guidance related to the Fukushima incident could then be effectively promulgated in like fashion as national consensus standards.

The ANS is an SDO that is accredited under ANSI. ANS standards are widely used within the U.S. as well as internationally in all areas of nuclear science and technology. ANS strongly feels that greater merit must be accorded to voluntary consensus standards in relation to other non-consensus documents. This approach also offers opportunities for "harmonizing" U.S. safety standards with those of international standards-setting bodies such as safety guides issued by the International Atomic Energy Agency and consensus standards issued by the International Organization for Standardization. The approach is also justified by the broader representation of technical capabilities of experts as well as the more unbiased perspectives brought to bear on such standards. The NRC would also be justified to consider the economic factors whereby the professional volunteer efforts (which are an integral part of developing and maintaining voluntary consensus standards) are made available to the agency essentially at no cost. The other factors to consider include such qualitative factors as equitable representation of diverse views of standards writers and approvers and the attention to detail that is part of the thorough consensus standard comment and balloting process. The NRC should recognize that the processes that pertain to developing a voluntary consensus standard are analogous to the disciplined approach that agencies themselves require in rulemaking.

The ANS Standards Committee stands ready to support the NRC's efforts to implement improvements to safety in light of the knowledge gained from the Fukushima events as well as others such as those at North Anna and Fort Calhoun. We consider this as a vital part of the Society's contributions to overcome the challenges posed by the Japanese earthquake and tsunami, the earthquake in Virginia, and the flooding of the Missouri River in 2011. In proposing that the ANS Standards Committee be charged with supporting the efforts to generate consensus standards from the above mentioned NEI and EPRI documents, we acknowledge the need to include representatives from NRC, NEI, EPRI, as well as other interested parties like owners groups, fabricators, vendors, and nuclear facility operators in the working groups constituted for this purpose. We also recognize that other ANSI-accredited bodies (for example, ASME on construction codes and IEEE for instrumentation) would be involved in executing the consensus standards approach to lessons learned and to future regulatory improvements.

All nuclear SDOs and standards supporters mentioned above are currently participants in the NESCC. ANS recommends that this vehicle be used to implement cooperative improvements across the U.S. SDOs and to initiate harmonization with international activities.

Respectfully yours,



Michael Corradini, Ph.D., President
American Nuclear Society

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