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SENIOR VICE PRESIDENT AND
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August 10, 2012

Mr. Michael R. Johnson
Deputy Executive Director for Reactor and Preparedness Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Evaluating Loss of Ultimate Heat Sink Due to Downstream Dam Failure

Project Number: 689

Reference: NRC 10 CFR 50.54(f) letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012

Dear Mr. Johnson,

The July 27, 2012 meeting between the industry and NRC Fukushima Steering Committees highlighted an issue concerning the need to consider the loss of the ultimate heat sink due to downstream dam failures as part of the flooding evaluation, requested in the letter referenced above, as a Tier 1 action item. This letter provides the industry's rationale for treating the loss of the ultimate heat sink as a Tier 2 item.

The industry believes that the common cause failure potential of external floods warrants priority attention. Flooding from the tsunami at Fukushima Daiichi was a direct cause of the loss of equipment that resulted in the accidents. A significant insight is the identification and assessment of new and significant flooding information that could affect the licensing basis. The implementation of the flooding reevaluations based on new information and current methodologies is one of the most important and safety-significant lessons learned from Fukushima. This reevaluation includes the impact on the structures, systems and components that supply cooling from the ultimate heat sink to the reactor, spent fuel pool and containment, but not the loss of the heat sink cooling source itself (river, ocean or lake).

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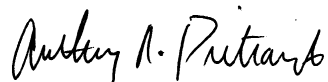
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Consideration of the loss of ultimate heat sink (the cooling source) from downstream dam failures as a Tier 1 action item would adversely affect the schedule for completion of flooding reevaluations for 21 units at 13 sites. We do not believe it is prudent to delay the completion of flooding reevaluations given the priority attention they merit based on what actually occurred at Fukushima Daiichi.

The industry believes that the potential loss of the ultimate heat sink (the cooling source) from a downstream dam failure should be evaluated as a Tier 2 activity. This evaluation of downstream dams would be performed holistically by including all potential failure modes rather than just focusing on the effects of flooding.

The industry is continuing with the reevaluation of the flooding hazards per the current work scope and schedules that do not include the evaluation of downstream dam failures and the potential loss of the ultimate heat sink. We look forward to a prompt resolution of this issue so that licensees can continue to move forward with implementing the lessons learned in the most efficient and expeditious manner. If you or the NRC staff has questions please contact me or Jim Riley (202-739-8137; jhr@nei.org).

Sincerely,



Anthony R. Pietrangelo

c: Mr. David L. Skeen, NRR/JLD, NRC
Mr. Scott C. Flanders, NRO/DSEA, NRC