

September 7, 2012

MEMORANDUM TO: Thomas Hiltz, Chief
Technical Support Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

FROM: Jonathan Marcano-Lozada, Structural Engineer
Technical Support Branch **/RA/**
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

SUBJECT: AUGUST 21, 2012, CATEGORY 2 PUBLIC MEETING SUMMARY
ON INDUSTRY'S DRAFT WHITE PAPER ON INTEGRATED
SAFETY ANALYSIS TREATMENT OF NATURAL PHENOMENA
HAZARDS BETWEEN THE U.S. NUCLEAR REGULATORY
COMMISSION AND THE NUCLEAR ENERGY INSTITUTE

The U.S. Nuclear Regulatory Commission's staff met with Nuclear Energy Institute representatives in a Category 2 public meeting on August 21, 2012, to discuss the contents of the draft industry white paper: "Integrated Safety Analysis Treatment of Natural Phenomena Hazards." The purpose of this meeting was to discuss the contents of the paper as it relates to an industry proposed path forward to address concerns identified during the implementation of Temporary Instruction 2600/015, "Evaluation of Licensee Strategies for the Prevention and/or Mitigation of Emergencies at Fuel Facilities." No regulatory decisions or commitments were made during the meeting.

Enclosures:

1. Meeting Summary
2. Attendance List

cc w/enclosures:

irs@nei.org (Janet Schlueter)
anm@nei.org (Andrew Mauer)

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OFFICE	FCSS/TSB	FCSS/FMB	FCSS/TSB
NAME	JMarcano	LAllen	THiltz
DATE	8/31/12	9/6/12	9/7 /12

OFFICIAL RECORD COPY

MEETING SUMMARY

DATE AND TIME: August 21, 2012, 1:00 P.M. to 3:00 P.M. (EDT)

PLACE: U.S. Nuclear Regulatory Commission (NRC)
Executive Boulevard Building
6003 Executive Boulevard
Room EBB-01E13
Rockville, MD 20852

CATEGORY 2: The public was invited to participate in this meeting by discussing regulatory issues with the NRC at designated points on the agenda.

ATTENDEES: See Enclosure 2

PURPOSE: To discuss the contents of draft industry white paper: Integrated Safety Analysis (ISA) Treatment of Natural Phenomena Hazards (NPH).

DISCUSSION:

The NRC's staff and representatives of the Nuclear Energy Institute (NEI) held a Category 2 public meeting on August 21, 2012, to discuss the contents of draft industry white paper: "Integrated Safety Analysis (ISA) Treatment of Natural Phenomena Hazards (NPH)." The purpose of this meeting was to discuss the contents of the paper as it relates to an industry proposed path forward to address concerns identified during the implementation of Temporary Instruction (TI) 2600/015, "Evaluation of Licensee Strategies for the Prevention and/or Mitigation of Emergencies at Fuel Facilities." Specifically, the industry described the contents of the paper as one possible strategy to demonstrate compliance with the performance requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 70.61 for natural phenomena accident sequences.

NEI representatives stated that the draft white paper provides a position that constitutes their basis of current safe operations and that it provides a starting point to address the unresolved items opened during the implementation of the TI 2600/015. Topics discussed at the meeting by the industry included:

- Use of facility building code of record at the time of construction to meet the performance requirements.
- Use of the most severe historical documented event for the site as the licensing basis event if the code of record did not provided criteria or requirements for NPH at the time of construction.
- Use of engineering calculations to calculate the capacity of the facility to withstand the different NPHs.

The NRC staff asked several questions regarding the contents and purpose of the draft industry white paper. Topics of interest asked and discussed by the NRC staff are:

- The performance requirements of 10 CFR 70.61 are based on the consequences of

events and process deviations. The NRC sought additional clarity regarding how NEI's draft analysis will consider not only performance of SSCs but also the consequences of failures of SSCs during NPH, including potential failures of internal SSCs.

- The NRC staff noted that the issues identified during the implementation of TI 2600/015 are compliance issues associated with current licensing basis of fuel facilities. The purpose of the evaluation of mitigation strategies for selected beyond design basis events activities performed under the TI was to assess the effectiveness of existing strategies under unexpected circumstances.
- The majority of facilities are located in the Central and Eastern United States. The building code of record at the time of construction might not include requirements for seismic detailing of structures. The NRC sought additional clarity regarding how NEI's draft analysis considers the uncertainty of deterministic methods (use of historical data).

The NRC staff and NEI representatives agreed that the meeting was a helpful starting point on the discussion of issues associated with the treatment of NPH. NRC staff also indicated that they will consider any submittals of positions and the information presented by NEI and other stakeholders to establish an appropriate path forward on the resolution of the issues identified during the implementation of TI 2600/015.

ACTION ITEMS:

None

REGULATORY COMMITMENTS:

No regulatory commitments were made during the meeting.

ATTENDANCE LIST

PUBLIC MEETING WITH NUCLEAR ENERGY INSTITUTE ON INTEGRATED SAFETY ANALYSIS TREATMENT OF NATURAL PHENOMENA HAZARDS

August 21, 2012
1:00 P.M. to 3:00 P.M.
6003 Executive Boulevard Building, Rockville, MD 20852
Conference Room EBB-1B13

Name	Affiliation
Jonathan Marcano	NRC/NMSS
Omar R. López	NRC/RII
Jeff Kimball	DNFSB
Andrew Mauer	NEI
Jennifer Wheeler	NFS
Brian Smith	NRC/NMSS
Bill Reckley	NRC/NRR
Tom Marenchin	NRC/OE
Nicholas W. Brown	NFS
Jonathan DeJesus	NRC/NMSS
Dennis Damon	NRC/NMSS
John D. Kinneman	NRC/NMSS
Carey W. Fleming	GE-Hitachi
Bill Kassebaum	USEC
Robert Link	AREVA-Richland
Calvin Manning	AREVA-Richland
Doug Yates	Shaw AREVA MOX
Gerard Couture	Westinghouse
David Spangler	B&W NOG-L
David Ward	B&W NOG-L
Leah Morrell	B&W NOG-L
Larry Wetzel	B&W NOG-L
Don Parker	AREVA Enrichment Services
Al Kennedy	GE-Hitachi
Marvin Sykes	NRC/RII
Thomas Hiltz	NRC/NMSS
Peter Miner	USEC
Antonio Fernandez	GE-Hitachi
Carlos Sisco	Winston & Strawn