

NRR ACTION PLAN

CLOSURE OF BULLETIN 2011-01, "MITIGATING STRATEGIES"

Multiplant Action No. X111

Final Update: August 31, 2012

Lead Division: DPR

Supporting Divisions: DE, DSS, DRA, DIRS, DCI, DORL

Supporting Offices: Regional Offices, NRO

Description: In light of the events at Fukushima Dai-ichi Nuclear Power Station following the March 11, 2011, earthquake and tsunami, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies," in order to comprehensively verify licensee compliance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(hh)(2) and to obtain information associated with licensee mitigating strategies.

Background: The events in Japan highlighted the importance and potential versatility of B.5.b mitigating strategies. Therefore, the NRC sought comprehensive confirmation that licensees maintain equipment and strategies to satisfy 10 CFR 50.54(hh)(2).

Bulletin 2011-01 requested responses to two sets of questions pursuant to the provisions of 10 CFR 50.54(f). The purpose of the first set of questions was to confirm compliance with 10 CFR 50.54(hh)(2). The purpose of the second set of questions was to obtain information on licensee programs to maintain compliance with 10 CFR 50.54(hh)(2).

Outcome: The NRC documented the outcome of its review of responses to the bulletin in a memorandum dated July 20, 2012 (ADAMS Accession No. ML121910389). As stated in the memorandum, NRC staff reviewed all the licensee responses to Bulletin 2011-01 and found that each licensee provided the information requested. Each licensee was sent a letter documenting this finding with a summary of the staff's review.

The NRC staff did not identify any noncompliances or any items that would need follow-up by inspectors as a result of its review. The NRC staff notes that all licensees identified actions taken since the March 11, 2011, event at Fukushima Dai-ichi to ensure that the 10 CFR 50.54(hh)(2) mitigation strategies remain feasible. Insights gained from the bulletin responses have been used to inform other post-Fukushima activities, such as the recently issued interim staff guidance (ADAMS Accession No. ML12229A174) for Order EA-12-049.

Current Status: The original action plan was initiated on July 11, 2011 (ADAMS Accession No. ML111881015). All actions in the action plan are complete.

Milestones and Scheduled Dates for Completion:

Milestone	Scheduled	Actual	Comments
Issue Bulletin	5/11/2011	5/11/2011(C)	
30-day responses due	6/10/2011	6/10/2011(C)	
Evaluate 30-day responses	7/1/2011	6/22/2011(C)	
Notify Regions of potential non-compliances	7/8/2011	N/A	No non-compliances identified
60-day responses due	7/10/2011	7/11/2011(C)	One correction provided 8/5/11
Issue RAI on 30-day responses, if needed	7/15/2011	N/A	None issued. Phone calls were conducted to clarify responses
Evaluate 60-day response adequacy	8/26/2011	9/06/2011(C)	
Issue RAI on 60-day responses, if needed	9/9/2011	1/17/2012(C)	
Responses to RAI due	10/9/2011	2/16/2012(C)	
Review RAI responses and issue closeout letters	11/18/2011	8/22/2012(C)	
Issue Bulletin Closure Memo	12/2/2011	8/31/2012(C)	
Follow-On Activities			
Evaluate responses for generic or plant specific regulatory action needs	12/2/2011	3/20/2012(C)	ADAMS Accession No. ML120860040
Formulate recommendations on generic or plant specific regulatory needs	7/7/2012	7/20/2012(C)	ADAMS Accession No. ML121910389

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References:

1. Bulletin 2011-01, "Mitigating Strategies," May 11, 2011, ADAMS Accession No. ML111250360.
2. Order Modifying Licenses (Effective Immediately), Samuel J. Collins (NRC), EA-02-026, February 25, 2002.
3. Letter from James E. Dyer (NRC) to Holders of Licenses for Operating Power Reactors, "NRC Staff Guidance for Use in Achieving Satisfactory Compliance with February 25, 2005 Order Section B.5.b," February 25, 2005 (designated Safeguards Information).
4. Letter from Anthony R. Pietrangelo (NEI) to James E. Dyer (NRC), "NEI 06-12, Revision 2, B.5.b Phase 2 & 3 Submittal Guideline," December 14, 2006.
5. Letter from James E. Dyer (NRC) to Anthony R. Pietrangelo (NEI), December 22, 2006.
6. NRC TI 2515/171, "Verification of Site Specific Implementation of B.5.B Phase 2 & 3 Mitigating Strategies," February 6, 2008.
7. NRC TI 2515/171, Revision 1, "Verification of Site Specific Implementation of B.5.B Phase 2 & 3 Mitigating Strategies," July 25, 2008.
8. NRC TI 2515/168, "Closeout Inspection of Nuclear Reactor Safeguards Interim Compensatory Measures - Section B.5.b Plant Mitigating Strategies to Address Loss of

Large Areas of the Plant due to Explosion or Fire," May 2006, (designated Safeguards Information)

9. Interim Staff Guidance, "Compliance with 10 CFR 50.54(hh)(2) and 10 CFR 52.80(d) Loss of Large Areas of the Plant due to Explosions or Fires from a Beyond-Design Basis Event," DC/COL-ISG-016, July 27, 2010.
10. Memorandum from David L. Pelton to Timothy J. McGinty, "Completion of Review of Licensee Responses to Bulletin 2011-01, 'Mitigating Strategies,'" July 20, 2012, ADAMS Accession No. ML121910389.