

Severe Accident Capable Hardened Venting Order

March 29, 2013

Relationship to Other Requirements

- Development of vent Order modification must be cognizant of other post-Fukushima Orders and regulatory requirements that could be affected
 - Impacts industry's ability to implement mitigating strategies schedules in EA-12-049 due to new venting requirements.
 - NRC staff and industry should look for other interferences.
- Clear distinction between Order and Rulemaking elements

Implementation Schedule

- Modified Order should restart milestones from original Order and follow similar pattern, with two exceptions:
- Recommend that start of implementation period (2 fuel cycles) begin following submittal of revised integrated plan no sooner than June 30, 2014
 - Avoids overlapping Order implementation schedules with unit outages.
 - Creates a brief delay in current plan.
- Industry commits to preparing implementation guidance and will submit for NRC endorsement

Technical Matters

- NEI January 25, 2013 letter discussed concerns with technical requirements of draft Order in SECY-12-0157 (Enc. 7A)
- Industry will provide specific recommendations in writing prior to next meeting.
- We have several items for discussion today.

Technical Matters*

(continued)

- Suppression pool bypass avoidance (§4.1) is part of filtration strategy and should be addressed within Rulemaking. It only applies to BWR Mark IIs
- Cross flow requirement (§1.2.4) should read “minimized” as it does in current RHV Order

Technical Matters*

(continued)

- With the addition of hydrogen and elevated radiation, the criteria in the current Order addresses a severe accident
- Address requirements for drywell venting (§1.2.2) in Rulemaking