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**Subject:** FW: FAQs  
**Date:** Wednesday, May 01, 2013 5:50:02 PM  
**Attachments:** [FAQ 023 CLB Event Duration Unspecified.doc](#)  
[FAQ 024 Simple IA Manual Action Evaluation.doc](#)

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Chris, Ed;

These are the FAQs we would like to discuss at our meeting on Thursday.

*Jim Riley*

**NEI**

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**From:** Hubbard, Dean M [mailto:Dean.Hubbard@duke-energy.com]

**Sent:** Wednesday, May 01, 2013 5:32 PM

**To:** RILEY, Jim

**Subject:** FAQs

Dean

**Dean M. Hubbard, PE**

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## Inquiry Form – Industry Approval

|   |                     |
|---|---------------------|
| <b>A. TOPIC:</b> Integrated Assessment trigger – Undefined CLB Event Duration   |                     |
| Source document: <u>JLD-ISG-2012-05</u>   | Section: <u>1.1</u> |
| <b>B. DESCRIPTION:</b><br><br>The design basis flooding evaluation for some licensees does not contain specific information on event duration, however the hazard reevaluation will contain this information. Is it necessary to perform an Integrated Assessment if the design basis flooding evaluation bounds the reevaluated hazard in all respects, but the design basis evaluation does not include specific information on the duration of the flood hazards evaluated?  |                     |
| <b>C. Initiator:</b><br><br>Name: <u>Jim Riley</u> Phone: <u>202-739-8137</u><br>Date: <u>04-18-13</u> E-Mail: <u>jhr@nei.org</u>   |                     |
| <b>D. RESOLUTION:</b> (Include additional pages if necessary. Total pages: <u>2</u> )<br><br>Inquiry number: <u>023</u> Priority: <u>H</u><br><br>It is not necessary to perform an Integrated Assessment if the design basis flood evaluation does not contain information on flooding event duration but bounds the reevaluated hazard in all other respects (including addressing all applicable associated effects), as long as there is no reason to believe that the flood duration has <del>not</del> changed. <u>Also, explain the basis for the conclusion.</u><br><br>EXAMPLE:<br>The limiting event for the site is a hurricane driven storm surge. The expected surge height and all applicable associated effects determined by the reevaluation are bounded by the design basis evaluation. In addition, all other design basis hazards and associated effects bound the parameters in the reevaluated hazard.<br><br>The duration of the limiting flooding event in the reevaluation is 2 days; however, the duration of the corresponding design basis event was not specified. Since all other aspects of the reevaluation are bounded and since no new information indicates that the event duration has increased significantly, it can reasonably be assumed that the durations of the event in the reevaluation and the CDB are approximately the same. Therefore it is acceptable to assume that the CDB event evaluation bounds the reevaluated hazard and an Integrated Assessment is not necessary.<br><br>Revision: <u>0</u> Date: <u>4/18/13</u> |                     |
| <b>E. NRC Review:</b><br><br>Not Necessary _____ Necessary <u>X</u><br>Explanation: _____   |                     |
| <b>F. Industry Approval:</b><br><br>Documentation Method: _____ Date: _____   |                     |

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**G. NRC Acceptance:**

Interpretation \_\_\_\_\_

Agency Position \_\_\_\_\_

Documentation Method: \_\_\_\_\_

Date: \_\_\_\_\_

## Inquiry Form – Industry Approval

**A. TOPIC:** Simple Integrated Assessment - Evaluating Manual Actions

Source document: JLD-ISG-2012-05 Section: 6.2, 7<sup>th</sup> bullet

**B. DESCRIPTION:**

An Integrated Assessment (IA) is required but it is expected to be simple because the site's flooding response relies only on protection (no mitigation) and the reevaluated hazard is bounded by the CDB in all respects except for one of the following:

- The flooding CDB was silent on an associated effect that was included in the reevaluation
- The flooding reevaluation including associated effects resulted in no increase in overall flood height

The existing operator actions are proceduralized, trained on, and are not changed or affected by the reevaluated hazard in a manner not considered by a reasonable simulation. In addition, no small APMs were identified during the flood design basis walkdowns for the flood protection feature being considered.

Is it necessary to perform a HRA evaluation in accordance with JLD-ISG 2012-05 of any operator actions included in the site's flood protection response?

**C. Initiator:**

Name: Jim Riley Phone: 202-739-8137  
Date: 04-18-13 E-Mail: [jhr@nei.org](mailto:jhr@nei.org)

**D. RESOLUTION:** (Include additional pages if necessary. Total pages: 2)

Inquiry number: 024 Priority: H

In the specific circumstances listed above, it is not necessary to perform an HRA evaluation of the operator actions required to establish flood protection as part of the Integrated Assessment as long as the actions have not changed, were not affected by the reevaluated hazard, all actions have been evaluated by "Reasonable Simulation" (see the flooding design basis walkdown guidance, NEI 12-07), and no small APMs were identified for the flood protection feature during the design basis walkdowns. A justification for the use of Reasonable Simulation instead of human reliability analysis (JLD-ISG-2012-05 Appendix C) is required and the results of the reasonable simulation must be included in the Integrated Assessment report.

**EXAMPLE:**

The limiting event for the site is a hurricane driven storm surge. The expected surge height plus wave run-up determined by the reevaluation is bounded by total still water flood height in the design basis evaluation, but the design basis evaluation did not specifically address wave run-up. The only operator actions in the design basis are the installation of stop logs in a flood barrier and these were not changed or affected by the reevaluated hazard. The required actions are defined by procedure, demonstrated by reasonable simulation, and operators are trained on the procedure periodically. No small APMs were identified for the stop log barrier.

## Inquiry Form – Industry Approval

An Integrated Assessment is required in order to evaluate the additional associated effect. However, the evaluation of the operator actions may be accomplished by "Reasonable Simulation" instead of a human reliability analysis. Note that the reasonable simulation could be performed again to validate the parameters in the reevaluation.

Revision: 0                      Date: 4/18/13

**E. NRC Review:**

Not Necessary \_\_\_\_\_    Necessary X \_\_\_\_\_  
Explanation: \_\_\_\_\_

**F. Industry Approval:**

Documentation Method: \_\_\_\_\_    Date: \_\_\_\_\_

**G. NRC Acceptance:**

Interpretation \_\_\_\_\_    Agency Position \_\_\_\_\_  
Documentation Method: \_\_\_\_\_    Date: \_\_\_\_\_