

Advanced Notice of Proposed Rulemaking Comments

Comments/Responses to Federal Register Posting Questions in Section IV.B, C and D

1. In general, adding potentially arbitrary values to existing design basis parameters should be avoided. For Example, in question B.1, adding a new amount of margin to existing flood elevations at a dry site would not add any safety value in a real sense. Consideration of conditions beyond the existing design bases is already considered in the licensees' responses to NRC Order EA-12-049 and the NRC's Fukushima 50.54.f Request For Information letter for Flooding and Seismic hazards. Any new rule should be based on the same principles used to comply with those documents.
2. Question B.3 – The timelines for SBO mitigation can be based on the licensee's' responses to EA-12-049.
3. Question B.4 - Any new rule should not apply the same response criteria and requirements to all sites. Each site is unique and should be evaluated on its own merits and for its own set of hazards.
4. Question B.5 – This depends on each site and the unit specific design (e.g. – reliance on shared equipment). This should remain unit specific.
5. Question B.6 – Long term water makeup to SFPs is already addressed by EA-12-049 and this is adequate for coping with an ELAP.
6. Question B.7.b – NO, adding selected values of so called 'additional margin' across the board can be counterproductive to safety by diverting resources from other safety improvements to activities that do not improve safety at a site. Each site needs to be considered on its own.
7. Question B.7.c – NO, this would just be adding additional equipment failures on top of an already highly unlikely set of failures.
8. Question B.8 – little to no benefit in improving safety would be expected beyond that achieved by the responses already underway in response to the NRC's Orders and 50.54.f requirements.
9. Question C.1.a – The objectives should be to protect the fuel in the core, the fuel in the fuel pools, and the primary containment and keep them intact.
10. Question C.1.c – YES, the new rule should be performance based to reflect the unique qualities of each site.
11. Question C.4 – New procedure types should not be required. Integration of existing procedures should be encouraged.

12. Questions C.5 and C.6 – The Orders for Hardened Containment Vents and new Spent Fuel Pool Instrumentation already require these systems to have backup power capability and the ability to be powered as part of the EA-12-49 response. They do not need to be singled out in any new rulemaking.
13. Question D.3 – Staffing is already covered in the 50.54.f requirements and should not be part of this rulemaking.
14. Questions D.4 and 5 – NO, the response equipment added by EA-12-049 should not be in the Technical Specification LCOs, Surveillance Requirements, and FSAR.

Comments/Responses to the Regulatory Basis Document

1. Section 3.2, page 18, second dot – the new rule should reflect all the related actions currently underway in response to the NRC's Orders and 50.54.f requirements. Therefore, no 'substantive differences' should exist.
2. Appendix A, page 33, Design Requirement 2. – Please clarify that the portable equipment can be connected to installed piping and electrical distribution systems.

RulemakingComments Resource

From: O'Rourke, Brenda W <BWORourke@pplweb.com>
Sent: Monday, June 03, 2013 11:45 AM
To: RulemakingComments Resource
Subject: Advance notice of proposed rulemaking - Station Blackout - Docket ID NRC-2011-0299
Attachments: Comments on Advanced Notice of Proposed Rulemaking - SBO.docx

Importance: High

To whom it may concern,

Attached are comments from PPL, Susquehanna (LLC) regarding the advanced proposed rulemaking for Station Blackout. If you have any questions, please contact me at the number below.

Thank you,

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