

# Technical Basis Discussion for Filtering Strategies Rulemaking

June 13, 2013



# Topics

- Regulatory Framework
- Rulemaking Problem Statement
- Development of Regulatory Basis
  - Scope of Applicability
  - Rulemaking Objectives
  - Scope of Options for Consideration
  - Interface with Economic Consequences

# Regulatory Framework

- Coordination with other post-Fukushima orders and rulemakings is critical.
- Needed:
  - Regulatory Objectives
    - Problem statement
    - Success criteria
  - Criteria for Decision-making
  - Technical Basis Document key elements
  - Rulemaking plan

# Problem Statement

- Objectives derived from SRM-SECY-12-0157
  - Filtering Strategies
  - Severe accident management
- Basis
  - Public health and safety?
  - Land contamination?
  - Integrity of containment fission product barrier?
  - Hydrogen control?
- Success criteria should be clear, measurable and aligned with SRM

# Development of Regulatory Basis

- Regulatory technical analysis needed
- Base case should reflect implementation of EA-13-109
- Industry willing to support with realistic cost data
- A number of related issues must be resolved before basis can be established

# Scope of Applicability

- Limited to BWRs Mark I & II containments
- Extending beyond this scope:
  - Will require significant resources for both NRC and stakeholders
  - Increase required interactions
  - Challenges the schedule

# Scope of Options for Consideration

- Base case is SACV + B.5.b + EPG Rev 3
- Filtering “strategies” implies both
  - Procedural changes and
  - Hardware changes
- In addition, SRM says to explore ways to  
*“enhance the capability to maintain containment integrity and to cool core debris”*
- Include a spectrum of options looking at incremental benefits and costs
  - Industry will provide input by next meeting

# Economic Consequences

- Ongoing NRC staff work on economic consequences seems to have potential implications for the technical basis report
  - Timeline does not appear synchronized