

Technical Basis Discussion for Filtering Strategies Rulemaking

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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