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Attachments: [FAQ 31 - Interim Actions Responses Rev 0 for NRC.doc](#)

Chris, Ed;

FAQ 031 is attached for discussion tomorrow. We will explain the FAQ during the meeting, but in general it is intended to firm up concepts of interim action rigor and timeliness based on previous documents issued by NRC and NEI.



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FAQ 31: HRR – Interim Action Responses

time frame will also be based on the level of effort and time required to develop and implement the interim actions. Interim actions should focus on providing margin for assurance of the ability for maintaining the critical safety functions necessary to prevent core damage, spent fuel damage, and loss of containment integrity. Interim actions to meet the new beyond design basis hazard can include:

- a. Actions taken in response to INPO IER 11-1
- b. Actions already taken or imminent actions associated with implementation of FLEX
- c. Actions taken to address small Available Physical Margins (APMs) identified as part of the recent flooding design basis walkdowns
- d. Actions taken as a result of the flooding IPEEE reviews or other site initiatives
- e. Actions taken in response to major storms
- f. Flood protection or mitigation capabilities that are not currently credited in the plant's current licensing basis

Interim actions are not expected to be extensive or permanent modifications, since the final flooding reevaluation results will not be confirmed until the NRC issues a Staff Assessment for the sites Flooding Hazard Reevaluation Report. Also, the Integrated Assessment will determine mitigation or protective actions to be considered by the NRC during the Phase 2 review to determine if any regulatory actions are needed to protect against the updated flooding related hazards (e.g., update the design basis and SSCs important to safety).

Rigor for Interim Actions

- a. All new interim flood protection features (e.g., sandbags inflatable barriers, self-inflating flood bags, ventilation louver covers) will be acquired, pre-staged and maintained to provide the required protection or mitigation.
- b. The design of the new flood mitigation equipment will be verified to withstand the environmental conditions that might accompany the applicable reevaluated flood event.
- c. Station procedures will be revised to direct installation of the new flood mitigation equipment.
- d. Training on the use and installation of the new flood mitigation equipment will be conducted as determined by the Systematic Approach to Training (SAT) process for all necessary personnel.
- e. Installation of the new flood mitigation equipment will be verified to ensure that it can be properly installed within the required timeframes using reasonable simulations, or other appropriate methods.

Examples

The interim action responses will be described by addressing two cases for Small Increase in Flooding Hazard(s), and Large Increase in Flooding Hazard(s):

- a. **Small Increase in Flooding Hazard(s)** - The site HRR has identified a new flooding hazard with a small increase in the flooding hazard above CLB flooding levels. The site is able to develop interim actions where a majority of the interim actions include flooding barriers that can easily be raised and existing procedures that can be modified to address the new hazard. Any interim actions that have not been implemented when the HRR report is submitted should be included in the HRR as planned actions. The site should take the following actions:
 1. Document the beyond design basis hazard in the site corrective action program.
 2. Include in the HRR actions taken and include a plan and schedule to complete any remaining interim actions to mitigate the hazard.
 3. The interim actions should typically be implemented within 3 to 6 months after the submittal of the HRR.

