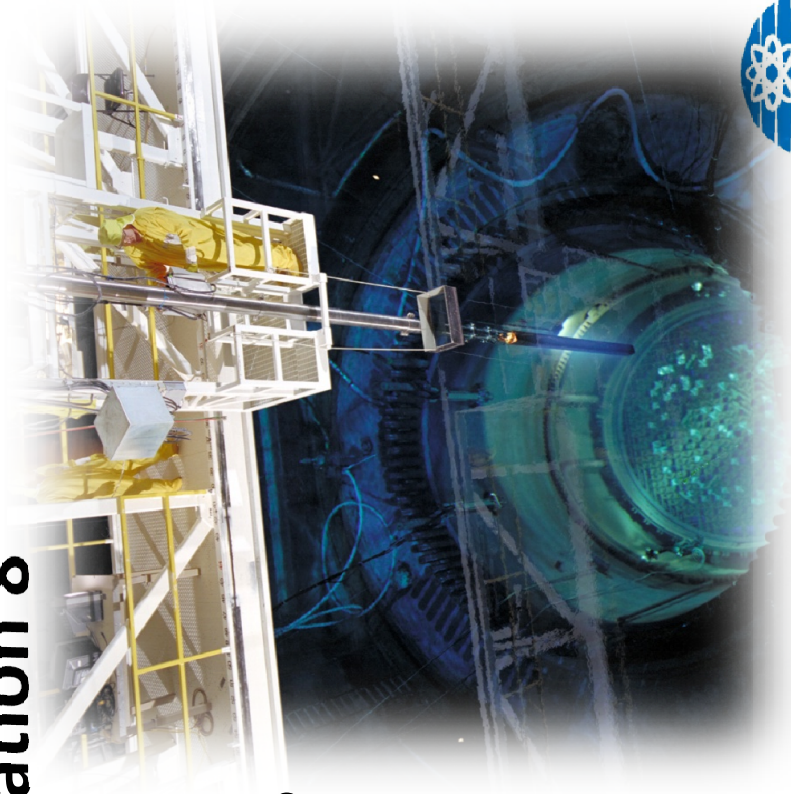


Update on Owners' Groups Activities - NTTF Recommendation 8



**JOINT BWR and PWR OWNERS
GROUPS**

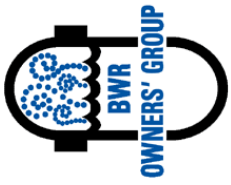
**Jack Stringfellow; Chairman -
PWROG**

November 19, 2013



Joint Owners' Groups Objectives

- Integration of procedures and guidance (e.g., transition points)
- Command and control capabilities for responding to extreme events affecting all onsite units
- Programmatic requirements to sustain plant capabilities



Joint Owners' Groups Focus

Prevention (First)

- FLEX implementation

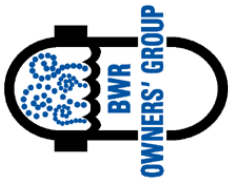
Mitigation (Second)

- SAMG focus follows FLEX Implementation



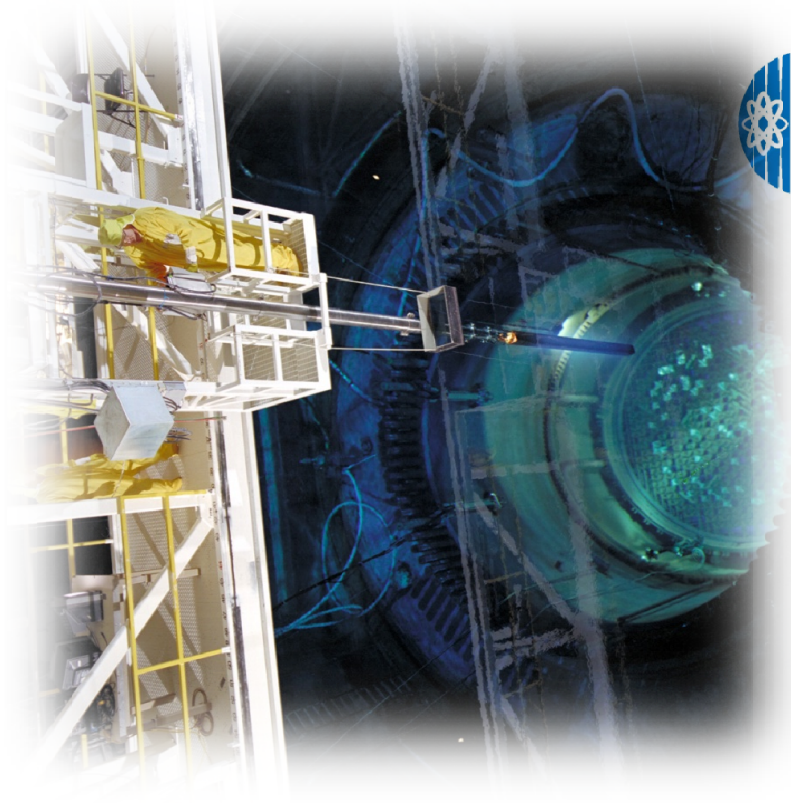
Summary

- We support a high-level rule with staff endorsement of industry-developed guidance:
 - Due to timing of release of draft rule language; full industry review is ongoing
- Maintain separation of Onsite Accident Management and Emergency Plan regulations
- Regulatory positions should be consistent with Beyond Design Basis (BDB) event response principles



Joint Owners' Group Task Force

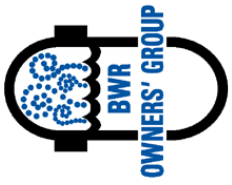
Key Joint Owners' Group Activities



Jay Lyter (Exelon) BWROG
Steve Pierson (Exelon) PWROG

November 19, 2013



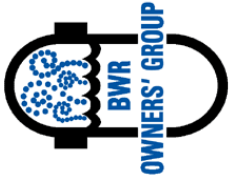


Joint Owners' Group Task Force

Task Force is composed of utility subject matter experts (with vendor support) from the following functions:

- Plant Operations
- Training
- Emergency Planning
- Severe Accident Analysis
- FLEX Implementation Leads
- Procedure Writers

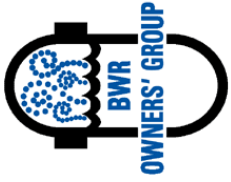




Elements of Owners' Groups Guidance

- Procedure/Guidance Integration
- Development and maintenance of Onsite Accident Management Procedures along with Additional Supporting Guidance
- Command and Control





Owners' Group vs. Licensee Responsibilities - Examples

Owners' Group

- Enhance generic SAMG guidance
- Develop generic FLEX support guidelines
- Develop generic industry guidance for command and control

Licensee

- Revise site-specific SAMGs to incorporate enhanced guidance
- Develop site-specific FLEX Support guidelines
- Update command and control structure for onsite accident management



Procedure Integration

- Integration of accident mitigation capabilities across appropriate procedures and guidelines:
 - Ensure no gaps in procedure guidance from event initiation through SAMG
 - Using capabilities across all procedures and guidelines
- Clear transitions between procedures and guidelines

Command and Control Structure

- Command and Control structure is different for onsite versus offsite activities:
 - Command and Control for onsite activities may remain in the main control room or be transferred to the Technical Support Center
 - Command and Control for offsite activities may be transferred to the Emergency Operations Facility (EOF)
- An effective Command and Control structure should be based on “key functions” rather than locations:
 - Any transfer of Command and Control from one person to another should be clearly identified

Command and Control Structure

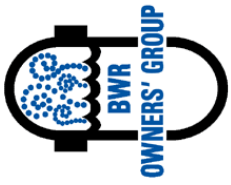
- Command and control structure considers the following:
 - Events that use EOPs
 - Events that use fire response strategies
 - Events that originate at shutdown & refuel conditions
 - Events that impact the spent fuel pool
 - Large-scale damage events that use EDMGs
 - Accidents involving multiunit events
 - Beyond Design Basis External Events (BDBEE) that use FSGs
 - Events that progress to use of SAMGs

Programmatic Controls

- Elements common to all accident management procedures/guidance (EOP, AOP, FSG, EDMG & SAMG):
 - a) Start with technical basis development:
 - Generic or plant specific technical bases
 - b) Process for development of procedures and guidance:
 - Plant specific implementation
 - c) Verification and Validation of procedures and guidance:
 - Objectives, methods, and disposition of findings
 - Transitions
 - d) Maintenance of procedures and guidance:
 - Document control, ongoing assessment, and updating for new information

Programmatic Controls

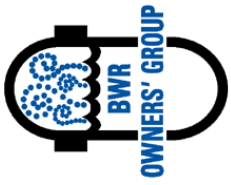
- Programmatic control elements that should remain different between EOP, AOP, FSG, EDMG or SAMG:
 - Level of detail and rigor of technical bases and guidance
 - Requirements in regulations and best practices
 - Methods available for Verification and Validation



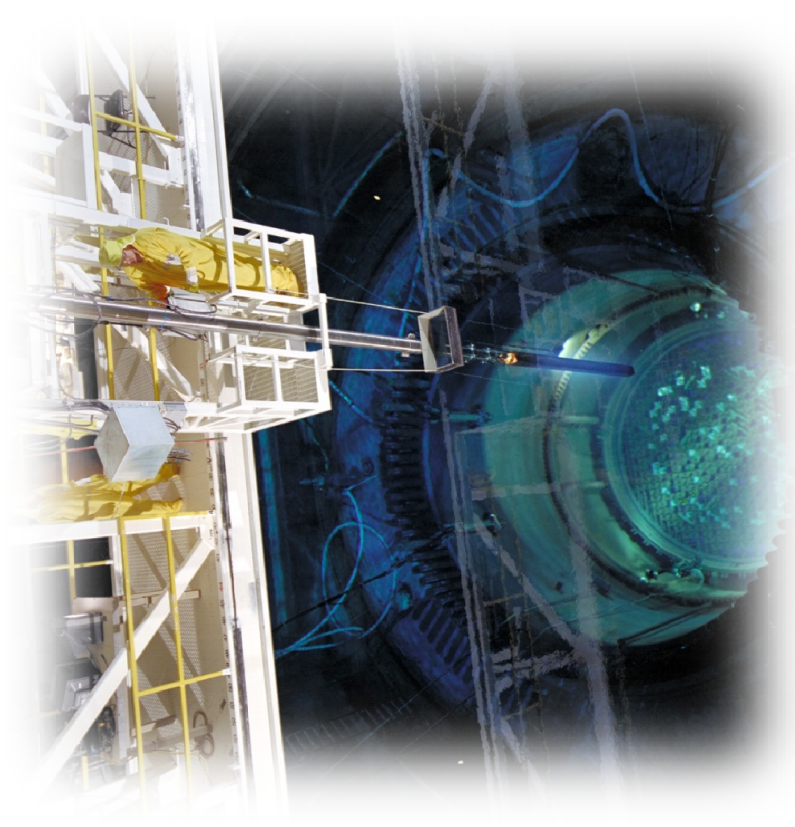
Future Owner's Group Activities

- Review EOPs, AOPs, and FSGs for shutdown & refuel conditions
- Review fire response strategies to identify and address potential conflicts with BDB/SAMG strategies





Summary, Points of Contact & Questions

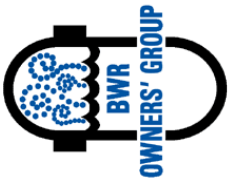


**JOINT BWR and PWR OWNERS
GROUPS**

**Jack Stringfellow; Chairman -
PWROG**

November 19, 2013





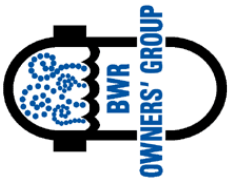
Points of Contact for Joint Task Force

- Lesa Hill BWROG Chair
- Jack Stringfellow PWROG Chair



Conclusion

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 - Due to timing of release of draft rule language; full industry review is ongoing
- Maintain separation of Onsite Accident Management and Emergency Plan regulations
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Questions

