

**From:** [Kuntz, Robert](#)  
**To:** [Miller, Ed](#)  
**Subject:** FAQ 23  
**Date:** Monday, December 09, 2013 10:57:00 AM  
**Attachments:** [FAQ 023 CLB Event Duration Unspecified Rev 2.doc](#)

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Ed,

Attached is FAQ 23 from the November 14<sup>th</sup> meeting. The staff provided comment at the meeting and NEI indicated that it would revise the FAQ and provide the FAQ to the NRC for its review for any additional comments.

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## FAQ 023: Undefined CLB Event Duration

**A. TOPIC:** Integrated Assessment trigger – Undefined CLB Event Duration

Source document: JLD-ISG-2012-05 Section: 1.1

**B. DESCRIPTION:**

The design basis flooding evaluation for some licensees does not contain specific information on event duration, however the hazard reevaluation will contain this information. Is it necessary to perform an Integrated Assessment if the design basis flooding evaluation **bounds** the reevaluated hazard in all respects, but the design basis evaluation does not include specific information on the duration of the flood hazards evaluated?

**C. Initiator:**

Name: Jim Riley Phone: 202-739-8137  
Date: 04-18-13 E-Mail: jhr@nei.org

**D. RESOLUTION:** (Include additional pages if necessary. Total pages: 2)

Inquiry number: 023 Priority: H

It is not necessary to perform an Integrated Assessment **for a flood mechanism** if the **current** design basis (CDB) evaluation of that mechanism does not contain **specific** information on **duration**, but **bounds** the reevaluated hazard in all other respects (including addressing all applicable associated effects), and there is no reason to believe that the duration has **increased**. **Note that the lack of duration information in the design basis is not sufficient by itself to conclude that an integrated assessment is not necessary. An effort must be made to determine whether flood duration was considered in the design of the flood protection features in order to be confident that the protection features remain adequate to perform their credited function.**

**The flooding reevaluation report should justify the conclusion that the duration of the design basis event is approximately the same or longer than the reevaluated hazard duration for the flooding mechanism of interest. This justification should include summaries of the current design basis for the flood mechanism and of the determination that the existing flood protection features are adequate for the reevaluated hazard duration.**

**EXAMPLE:**

The limiting event for the site is a hurricane driven storm surge. The expected surge height and all applicable associated effects determined by the reevaluation are bounded by the design basis evaluation. In addition, all other design basis hazards and associated effects bound the parameters in the reevaluated hazard.

The duration of the **hurricane driven storm surge** in the reevaluation is 2 days; however, the duration of the corresponding design basis event was not specified. Since all other aspects of the reevaluation are bounded and since no new information indicates that the event duration has increased significantly, **it is reasonable to believe** that the durations of the event in the reevaluation

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and the CDB are approximately the same. For these same reasons an Integrated Assessment is not necessary for this mechanism. The reevaluation report should document the rationale for this conclusion.

Revision: 2 Date: 7/3/13

### **E. NRC Review:**

Not Necessary \_\_\_\_\_

Necessary X

Explanation: \_\_\_\_\_

### **F. Industry Approval:**

Documentation Method: June 6, 2013 meeting summary Date: 6/7/2013

### **G. NRC Acceptance:**

Interpretation \_\_\_\_\_

Agency Position \_\_\_\_\_

Documentation Method: \_\_\_\_\_ Date: \_\_\_\_\_

### **G. NRC Acceptance:**

Interpretation X

Agency Position \_\_\_\_\_

Documentation Method: June 6, 2013 meeting summary Date: \_\_\_\_\_