

From: Kuntz, Robert
To: [Miller, Ed](#)
Subject: FAQ 23 discussed at December 19, 2013 public meeting
Date: Wednesday, January 08, 2014 2:08:00 PM
Attachments: [FAQ 023 CLB Event Duration Unspecified Rev 3.doc](#)

Ed,

Attached is FAQ 23 which was discussed at the December 19th public meeting. This FAQ had been revised by NEI based on NRC comments. During the meeting NRC staff had additional comments on the FAQ for NEI to consider.

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FAQ 023: Undefined CLB Event Duration or Warning Time

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 or warning time, 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 , or warning time available for, 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 or warning time available, 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 or warning time has been reduced. Note that the lack of duration or warning time 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 or warning time 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 is reasonable to infer that the duration / warning time of the design basis event is approximately the same or longer / shorter than the reevaluated hazard duration / warning time 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 and / or warning time.

EXAMPLE (applies to either the duration or warning time situation):

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 or warning time] of the hurricane driven storm surge in the reevaluation is 2 days; however, the [duration or warning time] of the corresponding design basis event was not specified.

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Since all other aspects of the reevaluation are bounded and since no new information indicates that the event [duration or warning time] has [increased or decreased (in the case of warning time)] significantly, it is reasonable to believe that the [durations or warning times] of the event in the reevaluation 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: 23 Date: 7/3/13 11/14/13

E. NRC Review:

Not Necessary _____ Necessary X
Explanation: _____

F. Industry Approval:

Documentation Method: _____ Date: _____

G. NRC Acceptance:

Interpretation _____ Agency Position _____
Documentation Method: _____ Date: _____

G. NRC Acceptance:

Interpretation X _____ Agency Position _____
Documentation Method: June 6, 2013 meeting summary Date: _____