

January 24, 2014

MEMORANDUM TO: Matthew A. Mitchell, Chief
Projects Management Branch
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

FROM: Robert F. Kuntz, Senior Project Manager **/RA/**
Projects Management Branch
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF NOVEMBER 14, 2013, PUBLIC MEETING
ON IMPLEMENTATION OF NEAR-TERM TASK FORCE
RECOMMENDATION 2.1, FLOODING HAZARD
REEVALUATIONS, RELATED TO THE FUKUSHIMA
DAI-ICHI NUCLEAR POWER PLANT ACCIDENT

On November 14, 2013, the Nuclear Regulatory Commission (NRC) staff held a public meeting¹ with stakeholders. The purpose of the meeting was to discuss the flooding hazard reevaluations that are being performed as part of Recommendation 2.1 from "Recommendations for enhancing Reactor Safety in the 21st Century," a report issued by the post-Fukushima Near-Term Task Force on July 12, 2011.² On March 12, 2012, the NRC issued a request for information pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) to implement this recommendation.³

The Nuclear Energy Institute (NEI) questioned the staff on how the U.S. Army Corps of Engineers (USACE) would be completing evaluation of dams that could potentially affect flooding analyses for certain nuclear power plants. Specifically, NEI questioned the staff on what sites had contacted the NRC to request USACE evaluation of upstream dams. The NRC staff responded that all requests received are available in the Agencywide Documents Access and Management System (ADAMS). NEI also questioned the staff on how the evaluations would be completed and how the licensees will be able to participate in the process. The NRC staff stated that each licensee that has requested information on USACE dams will be contacted by the NRC staff and the process will be explained.

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¹ The original meeting notice is available via ADAMS under Accession No. ML13310A304.

² The NTTF report is available under ADAMS Accession No. ML111861807.

³ The 50.54(f) letter is available under ADAMS Accession No. ML12053A340.

NEI also questioned the staff on how licensees should proceed if new information becomes available after the flooding hazard reevaluation is submitted to NRC. NEI questioned if that information should be submitted as a revision to the hazard reevaluation report or as part of the integrated assessment. NRC staff responded that they would consider NEI's question and provide guidance at a future public meeting.

The NRC staff provided comments⁴ on the portion of NEI's example of a scenario based evaluation performed as part of an integrated assessment (IA) related to evaluation of manual actions. In addition, NEI and staff had a discussion of the timing analysis associated with the manual action evaluation. NEI expressed a concern that the use of bounding estimates in the timing analysis may lead to unnecessary conservatism. The staff noted that Appendix C of JLD-ISG-2012-05 "Guidance for Performing the Integrated Assessment for External Flooding,"⁵ is intended to be conservative. Nonetheless, staff also noted that Appendix C offers some flexibility with respect to justifying that sufficient margin is available to ensure actions can be reliably performed.

NEI presented a list of questions and Frequently Asked Questions (FAQs) to discuss in the meeting.⁶ The FAQs discussed were: FAQ 17,⁷ FAQ 23,⁸ FAQ 25,⁹ FAQ 28, FAQ 29,¹⁰ and FAQ 31.¹¹

FAQ 17 relates to the scope of the IA when a single associated effect of a flooding mechanism is not bounded by the current design basis. NEI had presented FAQ 17 and the NRC staff had provided comments at a previous public meeting. NEI revised FAQ 17 and presented the revision for discussion. The NRC staff indicated that it would review the FAQ and provide comments at the next public meeting.

FAQ 23 relates to the "trigger" for the IA when the design basis flooding evaluation does not contain specific information on flood duration. The NRC staff suggested that NEI consider editing section D of the FAQ. NEI indicated that it would revise the FAQ and provide the FAQ to the NRC for its review for any additional comments.

FAQ 25 relates to use of location-specific results and the "trigger" for the integrated assessment. The NRC staff provided editorial suggestions on the organization of the FAQ. The staff also commented that for the second bullet "important to safety SSCs" could be expanded to also include SSCs associated with plant response to flooding. NEI indicated that it would consider the staff's comments and revise FAQ 25, as appropriate.

FAQ 28 was not presented at the meeting, but was discussed. NEI stated that the FAQ was no longer necessary.

⁴ NRC comments on the portion of NEI's example of a scenario based evaluation performed as part of an integrated assessment (IA) related to evaluation of manual actions is available in ADAMS under Accession No ML13350A661.

⁵ JLD-ISG-2012-05 is available in ADAMS under accession No. ML12311A214

⁶ A list of meeting questions and FAQs is available in ADAMS under Accession No. ML13350A658.

⁷ FAQ 17 is available in ADAMS under Accession No. ML13350A647

⁸ FAQ 23 is available in ADAMS under Accession No. ML13350A649

⁹ FAQ 25 is available in ADAMS under Accession No. ML13350A654

¹⁰ FAQ 29 is available in ADAMS under Accession No. ML13350A656

¹¹ FAQ 31 is available in ADAMS under Accession No. ML13350A657

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FAQ 29 provides definitions for terms used in JLD-ISG-2012-05. NEI presented FAQ 29 for discussion. The NRC staff indicated that it would review FAQ 29 and provide comments (if appropriate) at the next public meeting.

FAQ 31 relates to interim actions associated with the flooding hazard reevaluations. NEI presented FAQ 31 for discussion. The staff expressed concerns with the content of the FAQ. In lieu of the FAQ, NRC staff committed to prepare a presentation for the next public meeting that would describe "lessons-learned" from the interim action reviews the staff is currently performing.

Prior to concluding the meeting, an opportunity for public comment was afforded and an announcement was made that the next public interactions would be on December 19, 2013.

Enclosure:
Lists of Attendees

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Enclosure:
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ADAMS Accession No.: ML14010A285

* Concurrence via e-mail

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NAME	RKuntz	SLent	MMitchell	RKuntz
DATE	1/24/2014	1/ 10 /2014	1/24/2014	1/24/2014

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Public Meeting to Discuss Topics Associated with Flooding Hazard Walkdowns
November 14, 2013

Participant List

Name:

Organization:

Rob Kuntz	U.S. Nuclear Regulatory Commission (NRC)
Chris Cook	NRC
Michelle Bensi	NRC
Warren Sharp	NRC
Molly Keefe	NRC
James Riley	Nuclear Energy Institute
Colin Keller	FirstEnergy Nuclear Operating Company (FENOC)
Pat Brunette	FENOC
Ray Schneider	Westinghouse Electric Company
Mark Moenssens	Westinghouse Electric Company
Mark Hammons	FTN
Charlotte Geiger	PSEG
Jose Gasper	Omaha Public Power District
Dean Hubbard	Duke Energy
Joe Bellini	Aterra/Exelon
Jana Bergman	Scientech

Enclosure