

From: Dentel, Glenn
Sent: Wednesday, February 12, 2014 10:17 AM
To: 'Ari Herzog'
Subject: RE: NRC Public Meeting Response

Mr. Herzog,

I am responding back to your followup question noted below: The basis of my December 18 question involved the discovery of ASR (which was subsequent to 1998). It sounds like you're saying there is no connection between concrete degradation and compliance with updated SAMGs. Or am I not understanding? To be blunt: If ASR spreads to the extent that it is pivotal to a severe accident, should not Seabook Station have a SAMG compliant to the most latest revisions?

The Severe Accident Management Guidelines (SAMGs) are focused on dealing with the loss of multiple pieces of safety equipment beyond what is assumed in the design basis accident analysis for the plant. They are established to address beyond design basis events regardless of the original of the cause of the loss of equipment and/or structures for a severe accident. Therefore, there is not a direct connection between concrete degradation and the need to revise SAMGs.

As noted at the public meeting on December 18, ASR-affected structures remain fully capable of performing their design function. The concrete walls at Seabrook: 1) were designed with a substantial safety margin and engineering conservatisms in design, 2) field walk-downs have confirmed no visible indication of significant deformation or displacement of structures, or rebar corrosion, 3) the ASR identified was been confined to localized areas in select concrete walls, and, 4) the progression of ASR degradation has been occurring slowly over time.

Thus at this point, there is no technical basis to update the SAMGs based on ASR concrete degradation; further, as noted, these documents remain an industry initiative versus a regulatory requirement and are already designed to address the loss of multiple pieces of critical plant equipment after an event.

I trust this answers your additional questions Mr. Herzog. If you have any more, please feel free to contact me at (610) 337-5233.

Glenn Dentel, Branch Chief responsible for oversight of Seabrook, Salem & Hope Creek, 610-337-5233 (w)

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From: Ari Herzog [<mailto:ariherzog@gmail.com>]
Sent: Tuesday, January 21, 2014 12:38 PM
To: Dentel, Glenn
Subject: Re: NRC Public Meeting Response

Hi Glenn,

Thanks for your kind response; as I had not expected one. I do have a quick question about something you wrote:

"Since the plant's installed safety equipment has not changed significantly since 1998, nor have the basic strategies to deal with a severe, beyond design basis accident, the current version of the SAMGs in use at Seabrook are sufficient to deal with a severe accident."

The basis of my December 18 question involved the discovery of ASR (which was subsequent to 1998). It sounds like you're saying there is no connection between concrete degradation and compliance with updated SAMGs. Or am I not understanding?

To be blunt: If ASR spreads to the extent that it is pivotal to a severe accident, should not Seabrook Station have a SAMG compliant to the most latest revisions?

Thanks again. Ari Herzog Councilor at Large, Newburyport
<http://ariherzog.com> | <http://councilorariherzog.com>

On Tue, Jan 21, 2014 at 11:27 AM, Dentel, Glenn <Glenn.Dentel@nrc.gov> wrote:

Mr. Herzog,

At the December 18, 2013, public meeting, you raised a question regarding Seabrook's Severe Accident Management Guidelines (SAMGs). Specifically, you requested whether they had been updated since 1998. Seabrook Station has emergency operating procedures (EOPs) to address emergencies within the design basis of the plant to which it was licensed by the NRC. These have been in-place since the facility began operation and are regularly updated. For severe or unusual events beyond the design basis of the plant, such as those involving numerous failures of safety equipment, the SAMGs were developed as a voluntary industry initiative.

The SAMGs were developed using a standard guidance document prepared by the Nuclear Energy Institute, or NEI, the industry's trade group. The SAMGs at Seabrook were in-place by 1998. As part of the Fukushima Lessons Learned effort in April/May 2011, the NRC conducted additional inspection activities of the status of the SAMGs at all the facilities in the USA using Temporary Instruction 2515/184, "Availability and Readiness Inspection of Severe Accident Management Guidelines (SAMGs)." During this review at Seabrook, we identified that while the SAMGs are readily available in critical locations, are controlled and maintained by NextERA, and operators receive training on the SAMGs once every two years, they had not undergone a comprehensive three-year review when due in November 2010. This observation was placed in NextERA's corrective action program for resolution.

Since the plant's installed safety equipment has not changed significantly since 1998, nor have the basic strategies to deal with a severe, beyond design basis accident, the current version of the SAMGs in use at Seabrook are sufficient to deal with a severe accident.

Going forward, NextERA plans to update the SAMGs consistent with the industry revision to the guidance document recently published, and to reflect the additional equipment that will be available in the near future (e.g., remote spent fuel level monitoring, portable pumps and electric generators, as well as the necessary connections to use this equipment) following the implementation of the Fukushima Lessons Learned modifications.

We appreciate your interest and participation in the meeting. I believe this answers your specific concern; however, if you have any additional questions or concerns, please contact me at the number below or via email. *Glenn Dentel, Branch Chief responsible for oversight of Seabrook, Salem & Hope Creek 610-337-5233 (w)*