May 15, 2014

Mr. Joseph E. Pollock, Vice President Nuclear Operations Nuclear Energy Institute 1201 F Street NW, Suite 1100 Washington, DC 20004

Dear Mr. Pollock:

The U.S. Nuclear Regulatory Commission (NRC) staff has considered a request from the Nuclear Energy Institute (NEI), on behalf of the nuclear industry to endorse NEI white paper dated April 15, 2014, entitled "White Paper NEI HCVS-WP-01, Hardened Containment Vent System Dedicated and Permanently Installed Motive Force, Revision 0, April 14, 2014" (Agencywide Documents Access and Management Systems (ADAMS) Accession No. ML14120A298 and ML14120A295).

The purpose of the white paper is to further develop and clarify the guidance provided in NEI 13-02 (ADAMS Accession No. ML13316A853) related to licensees' ability to meet the requirements of Order EA-13-109, "Order Modifying Licenses With Regard To Reliable Hardened Containment Vents Capable of Performing under Severe Accident Conditions" (ADAMS Accession No. ML13130A067). The NRC staff has interacted with your staff and external stakeholders during the development of this white paper.

The NRC staff agrees that the white paper provides an acceptable interpretation of NRC Order EA 13-109 element 1.2.6 regarding the requirement that the Hardened Containment Vent System (HCVS) be able to operate for 24 hours with dedicated and permanently installed equipment including clarifications regarding HCVS components related to motive force such as electrical power and pneumatic supply. The NRC staff will evaluate a licensee's application of the guidance in its development of the final safety evaluation documenting compliance with NRC Order EA-13-109 for each plant.

Individual licensees should inform the NRC of their plans to abide by this generic interpretation and implementation approach, and their plans to address potential plant specific issues associated with implementing this order requirement. Additional guidance regarding referencing white papers and frequently asked questions within a application are provided in the templates prepared by the industry working group and endorsed by the NRC staff in a letter dated May 14, 2014. Licensees are strongly encouraged to follow the guidance in the NEI white paper, "HCVS-WP-01, Hardened Containment Vent System Dedicated and Permanently Installed Motive Force, Revision 0, April 14, 2014," in order to improve efficiency of the NRC's review and to avoid further requests for information.

If a licensee deviates from the guidance, the licensee should justify the deviations and provide information that demonstrates how associated requirements in NRC Order EA-13-109 will be met during an extended loss of AC power.

J. Pollock

If you have any questions, please contact Dr. Rajender Auluck, of my staff, at 301-415-1025, or via email to <u>Rajender.Auluck@nrc.gov</u>.

Sincerely,

/RA/

David Skeen, Director Japan Lessons-Learned Project Directorate Office of Nuclear Reactor Regulation J. Pollock

If you have any questions, please contact Dr. Rajender Auluck, of my staff, at 301-415-1025, or via email to <u>Rajender.Auluck@nrc.gov</u>.

Sincerely,

/RA/

David Skeen, Director Japan Lessons-Learned Project Directorate Office of Nuclear Reactor Regulation

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