

Kahler, Carolyn

From: Kahler, Carolyn
Sent: Wednesday, May 28, 2014 11:33 AM
To: 'MTH@nei.org'
Cc: Anderson, Joseph
Subject: RE: Response from "Submit a Question about Emergency Preparedness" (EPFAQ No. 2014-006)

Dear Mr. Hug:

Thank you for your recent submission of EPFAQ No. 2014-006 regarding the use of equipment abandonment procedures and processes during cessation of operation. NSIR/DPR has performed an acceptability review of proposed EPFAQ No. 2014-006, based on the applicability and screening criteria in NSIR Office Instruction EP-100 (ADAMS Accession No. ML12201A946) and based on discussions at the May 22, 2014 public meeting with the NEI Emergency Preparedness (EP) Decommissioning Transition Working Group. The results of this review are as follows:

- **EPFAQ No. 2014-006 (Abandonment of EP-Related Equipment)**
Rejected: Issue is outside of EPFAQ process since it does not relate directly to NRC issued or endorsed EP guidance. NSIR is proposing to take this to our NRC Decommissioning Transition Working Group for discuss and possible options for providing clarification to licensees.

If you have any questions regarding submitting an EPFAQ, please feel free to contact me at carolyn.kahler@nrc.gov or 301-287-3722.

Sincerely,

Carolyn J. Kahler

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-----Original Message-----

From: MTH@nei.org [<mailto:MTH@nei.org>]
Sent: Sunday, May 18, 2014 12:56 PM
To: EPFAQ Resource
Subject: Response from "Submit a Question about Emergency Preparedness"

Below is the result of your feedback form. It was submitted by

(MTH@nei.org) on Sunday, May 18, 2014 at 12:56:27

through the IP 209.170.118.134

using the form at <http://www.nrc.gov/about-nrc/emerg-preparedness/faq/faq-contactus.html>

and resulted in this email to epfaq.resource@nrc.gov

relevant-guidance:

revision-number:

applicable-sections:

comments: Question:

Is it permissible for a licensee that has submitted certification confirming cessation of operation and removal of fuel from the reactor vessel to use its equipment abandonment procedures and processes to permanently remove from service the emergency preparedness equipment which is not required to support permanently defueled accident scenarios? The licensee is no longer authorized to operate the reactor or place fuel into the reactor vessel (Ref. 10 C.F.R. 50.82).

Background:

NRC staff provided verbal guidance that, until a station receives approval of the Permanently Defuel Emergency Plan (PDEP), the only vehicle available to licensees is to use the station configuration control processes (equipment out-of-service programs, equipment checklist, etc.) to temporarily remove from service the emergency preparedness equipment which is not required to support permanently defueled accident scenarios.

This situation causes the station to defer workload and retain personnel to complete, after approval of the PDEP, the equipment abandonment process.

proposed-solution: Once the licensee has submitted certification confirming cessation of operation and removal of fuel from the reactor vessel and an analysis is performed to determine the permanently defueled accident scenarios, the equipment abandonment procedures and processes may be employed to permanently remove from service the emergency preparedness equipment which is not required to support permanently defueled accident scenarios.

originator: Martin Hug

organization: Nuclear Energy Institute (NEI)

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