

FAQ 035: HRR Revisions

A. TOPIC: HRR Revision Process

Source document: Fukushima Response 50.54(f) letter Enclosure 2

Section: Required Response

B. DESCRIPTION:

REQUIRED RESPONSE item 2 states that licensees must submit Hazard Reevaluation Reports (HRRs) in accordance with the NRC's prioritization plan and within 1 to 3 years after the date of the information request letter. The description of the response is silent on when and how to submit updated information that changes the results previously submitted in the HRR. Under what circumstances and processes should updated information to the HRR be submitted?

C. Initiator:

Name: Jim Riley Phone: 202-739-8137

Date: 06/26/13 E-Mail: jhr@nei.org

D. RESOLUTION: (Include additional pages if necessary. Total pages: 2)

Inquiry number: 035 Priority: H

The NRC has not yet agreed to a process for revising the HRRs, except in the case where the licensee finds an error in the initial submittal, because a revised submittal would be a burden on NRC resources (since their review might have to be restarted) and would cause a delay in closure of the 50.54(f) response. From a utility's perspective, a revision would be costly and the improvement in results would have to be worth the cost of the revision. However, there may be compelling reasons for some licensees to submit changes to their HRRs to address significant corrections, updated assumptions, or updated models/analysis.

The NEI Fukushima Flooding Task Force has developed the following possibilities for submitting new information that significantly impacts the HRR. Note that if the new hazard analysis information is submitted sufficiently prior to issuance of the NRC's HRR Staff Assessment letter, the new information should be recognized.

1. Submit an addendum or revision to the HRR – (The NRC has concerns about this option for the reasons stated above, but the 50.54(f) process would not rule out this action).
2. Submit a revised hazard analysis in response to a RAI on the HRR submittal. Recognizing the time limit for responding to most RAIs, if the updated analysis has not already been completed the response could commit to completing an updated analysis by a specified date.
3. The NRC has required sites to notify them if there are any changes to the interim actions listed in the HRR. The new hazard analysis information could be submitted as an update to the interim actions. The new information could impact margin (positively or negatively) and would provide a basis for revisions to the flooding response strategy.
4. Include the new hazard analysis information as part of the Integrated Assessment (IA) and address both the original and revised hazards in parallel showing the consequences of, and response to both the HRR flooding level and the updated HMR flooding level.
5. Include the new hazard analysis information as an addendum or revision to the IA along with a description of the impacts to the IA conclusions caused by the updated hazard analysis.

Any of these approaches would put the new information on the docket and, depending on the timing of the submittal, either enable the NRC to recognize its effects on margin as they make their decision on hazard inputs to be used in the Integrated Assessment, or influence any regulatory action taken during Phase 2 of the 50.54(f) response process.

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Revision: <u>0b</u>	Date: <u>07/10/14</u>
<u>E. NRC Review:</u>	
Not Necessary _____	Necessary <u>X</u>
Explanation: _____	
<u>F. Industry Approval:</u>	
Documentation Method: _____	Date: _____
<u>G. NRC Acceptance:</u>	
Interpretation _____	Agency Position _____
Documentation Method: _____	Date: _____