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July 31, 2014

Dr. Jennifer L. Uhle  
Deputy Director for Reactor Safety Programs  
Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Second Industry Response to U.S. Nuclear Regulatory Commission Request for Information Related to the Filtering Strategies and Severe Accident Management of Boiling Water Reactors with Mark I and II Containments Rulemaking

**Project Number: 689**

Dear Dr. Uhle

The Nuclear Energy Institute (NEI)<sup>1</sup> is pleased to provide the nuclear industry's second response to NRC's May 21, 2014 letter requesting<sup>2</sup> information to support the Boiling Water Reactor (BWR) with Mark I and II filtering strategies rulemaking. The first response provided the requested filter system cost estimate.<sup>3</sup> Attached please find the industry response to the requested major assumptions related to the BWR Owners' Group's (BWROG)<sup>4</sup> guidance documents and other proprietary documents.

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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

<sup>2</sup> Letter, Jennifer Uhle (NRC) to Steven P. Kraft (NEI), *Request for Information Related to the Filtering Strategies and Severe Accident Management of Boiling Water Reactors with Mark I and II Containments Rulemaking*, May 21, 2014.

<sup>3</sup> Letter, Steven P. Kraft (NEI) to Jennifer Uhle (NRC), *Initial Industry Response to Nuclear Regulatory Commission Request for Information Related to the Filtering Strategies and Severe Accident Management of Boiling Water Reactors with Mark I and II Containments Rulemaking*, May 31, 2014.

<sup>4</sup> The BWR Owner's Group provides a forum where utility members can achieve higher plant reliability, maintain and improve plant safety, minimize and share costs, and facilitate regulatory interaction.

The NRC data request covers three distinct areas:

1. Detailed cost estimates – provided on May 31, 2014, as requested.
2. Major assumptions related to the BWR Owners' Group's guidance documents and other proprietary documents – requested by July 31, 2014, attached with this letter.
3. Plant-specific information – requested by July 31, 2014, please see discussion below.

### **Information request response due dates**

As noted in the May 31, 2014, letter, the NRC (in its May 21, 2014 letter) kindly recognized the challenge of collecting the plant-specific information in the time period requested in Request #3 and indicated that the information on Mark II containment plants is a higher priority than Mark I plants. While we have been making steady progress in obtaining the plant-specific information, we are, regrettably, unable to supply it by July 31, 2014, as requested. We expect to be able to provide all the Mark II plant data and a large part of the Mark I plant data by August 8, 2014, with the balance of the Mark I data as soon after that date as practicable.

### **Major assumptions related to the BWR Owners' Group's guidance documents and other proprietary documents**

Attached for NRC information and use are the industry's responses to the questions concerning the BWROG Emergency Procedure Guidelines/Severe Accident Guidelines Revision 3 (EPG/SAG Rev. 3).

Please note that a number of the questions could not be answered in the abstract and required an assumed scenario on which to base an answer. As described in the attachment, two scenarios were developed. The first assumed an extended loss of AC power and the unavailability of the motive force for the ultimate heat sink; there is no core damage. The second scenario assumed the first scenario plus the failure of the steam driven reactor pressure vessel water injection pump leading to core damage.

Answers to questions not covered by the scenarios are provided in the attachment following the scenarios.

We trust the information enclosed with this letter provides the information requested concerning the BWROG EPG/SAG Rev. 3. The industry stands ready to discuss these answers and the remainder of the information requested to support the filtering strategies rulemaking.

Dr. Jennifer L. Uhle

July 31, 2014

Page 3

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "SP Kraft". The signature is written in a cursive, somewhat stylized font.

Steven P. Kraft

Attachment

c: Mr. Aaron L. Szabo, NRR/DPR/PRMB, NRC  
Ms. Lesa P. Hill, Chairman, BWR Owners' Group