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September 15, 2014

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

Subject: Industry Response to Nuclear Regulatory Commission Request for Clarification and Supporting Basis for NEI Statements and Submitted Documents Related to the Filtering Strategies and Severe Accident Management of Boiling Water Reactors with Mark I and Mark II Containments

Project Number: 689

Dear Dr. Uhle:

The Nuclear Energy Institute (NEI)¹ is pleased to provide the nuclear industry's response to the NRC's August 27, 2014, request² for clarification and supporting basis for NEI statements and submitted documents related to the Containment Protection and Release Reduction of BWR with Mark I and Mark II Containments Rulemaking (CPRR Rulemaking).³ Attached are the industry's responses to the ten questions on general methodology and modeling posed in the enclosure to the August 27 letter. These responses were requested by September 15, 2014.

¹ 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.

² Letter, Jennifer Uhle (NRC) to Steven P. Kraft (NEI), *Request for Clarification and Supporting Basis for NEI Statements and Submitted Documents Related to the Filtering Strategies and Severe Accident Management of Boiling Water Reactors with Mark I And Mark II Containments*, August 27, 2014.

³ On August 21, 2014, NRC Staff announced that the "Filtering Strategies of Boiling Water Reactors with Mark I and Mark II Containments Rulemaking" is now entitled "Containment Protection and Release Reduction of BWR with Mark I and Mark II Containments Rulemaking (CPRR Rulemaking)" (*Category 2 Public Meeting to Discuss Filtering Strategies of Boiling Water Reactors with Mark I and Mark II Containments Rulemaking (Tac No. Mf1878) August 21, 2014*).

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In addition to the ten questions posed in the attachment, the NRC requested a significant amount of detailed information on the "small" external containment filter for BWR Mark I and II plants being included by the industry in its evaluation supporting the CPRR Rulemaking. The NRC also asked how this information differs from that describing the "large" filter also included in the industry evaluation. We are endeavoring to develop this information and to provide it in a format useful to NRC staff in its evaluations by the requested due date of September 21, 2014.⁴ We will advise you if we will not be able to provide the requested information by the date requested.

NEI acknowledges and thanks the BWR Owners' Group⁵ for its continuing close participation in the industry efforts in support of the CPRR rulemaking and input to the attached responses to the NRC's questions.

We trust the responses attached with this letter provide the information requested. The industry stands ready to discuss these responses and other matters in support of the CPRR rulemaking.

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

Sincerely,



Steven P. Kraft

Attachment

c: Ms. Lesa P. Hill, BWROG
Mr. Aaron L. Szabo, NRR/DPR/PRMB/PRAT, NRC

⁴ September 21, 2014 is a Sunday.

⁵ 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.