



October 8, 2014

BWROG-14053

Project Nos. 691 and 694

Mr. Lawrence E. Kokajko
Division Director, Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Proposed Auditing Process for Revisions of Generic Severe Accident Management Technical Guidelines

Reference: NRC ML14093A098 "SUMMARY OF MARCH 26-27, 2014, PUBLIC MEETING TO DISCUSS THE BOILING WATER REACTOR AND THE PRESSURIZED WATER REACTOR OWNERS GROUP'S EMERGENCY PROCEDURE GUIDELINES/SEVERE ACCIDENT GUIDELINES."

Dear Mr. Kokajko:

As you are aware, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting March 26-27, 2014 with the Boiling Water Reactor Owners' Group (BWROG) and Pressurized Water Reactor Owners' Group (PWROG) as documented in reference ML 14093A098 to discuss the Owners Groups (OGs) Emergency Procedure/Severe Accident Guidelines proprietary documents to inform rulemaking activities including the preparation of implementation documentation. This two-day workshop helped inform guidance development for the proposed rulemakings addressing NTTF Recommendations 4, 7, and 8 and also to inform the staff's regulatory basis development for NTTF Recommendation 5.

In addition, the NRC staff conducted a public meeting on August 26, 2014, to discuss several topics concerning the consolidated rulemaking being undertaken to address requirements for beyond-design-basis (BDB) event response planning and capabilities. With respect to one of those topics, Severe Accident Management Guidelines (SAMGs), the staff indicated that the preferred approach to regulatory oversight regarding ongoing maintenance of the guidelines would be to credit generic work performed at the industry-level and to structure the regulatory oversight towards this level. During the subsequent discussion, the staff requested that the BWROG and the PWROG provide a joint proposal for how such oversight might be accomplished.

After joint deliberation, the BWROG and PWROG would like to propose that the following process, and related attributes, be applied to staff oversight of generic severe accident management technical guidelines.

1. To better reflect the intended purpose and scope, we suggest that staff oversight of generic severe accident management technical guidelines be described as an “audit.”
2. The BWROG and PWROG will provide the staff with an opportunity to audit future revisions of their generic severe accident management technical guidelines prior to dissemination to the industry. Periodic guideline updates, which are issued between revision packages, would not be subject to the audit process. These periodic updates will be captured in a revision package.
3. Given the proprietary nature of the generic material, we would make all documents available to the staff on an electronic portal and provide the necessary access information (e.g., user names and passwords).
4. The staff would have the opportunity to provide questions or comments to the appropriate Owners Group within 60 calendar days of their access to the revised generic guidelines. The affected Owners Group will engage with staff members as necessary to address their questions or comments. Should no questions or comments be received within the 60-day period, the Owners Group would continue with their process to distribute the revision package to the industry. The Owners Group will make their best effort to address NRC staff questions and comments. However, should comments remain outstanding at the end of 60 days, the Owners Group will continue with their process to distribute the revision package to the industry in the interest of providing their membership with the best possible severe accident guidance.

We believe that the above approach would facilitate an appropriate level of regulatory oversight consistent with the Owners Groups’ mission of issuing high-quality products in a timely manner.

If you require additional information concerning our proposed process, please feel free to contact either Lesa Hill at 205-992-5727 or Jack Stringfellow at 205-743-9487.

Sincerely,



Lesla Hill, Chairman
BWROG

Jack Stringfellow, Chairman
PWROG

cc: Mr. Timothy A. Reed, NRR/DPR/PRMB, NRC
Ms. Jennifer T. Tobin, NRR/DPR/PRMB, NRC
Mr. David L. Young, NEI
Mr. Kenneth A. McCall, BWROG
Mr. Anthony Nowinowski, PWROG