

December 22, 2014

Mr. John W. Stetkar, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: STANDARD REVIEW PLAN CHAPTER 19 AND SECTION 17.4

Dear Mr. Stetkar:

I am responding to your letter dated November 13, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14314A653). The U.S. Nuclear Regulatory Commission (NRC) staff understands the position of the Advisory Committee on Reactor Safeguards (ACRS) regarding the guidance in the NRC Standard Review Plan (SRP) Chapter 19 and Section 17.4 on the treatment of nonsafety-related structures, systems, and components (SSC), specifically, the distinctions in the guidance between plant designs that employ active safety features and those that employ passive safety features. The NRC staff also understands the position of the ACRS regarding NRC guidance that endorses probabilistic risk assessment (PRA) conformance with ASME/ANS RA-S-2008, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Capability Category I versus II in design certification and combined license stages of the licensing reviews.

The NRC staff appreciates the comments and recommendations provided by the ACRS and recognizes that its August 28, 2014, response to the ACRS (ADAMS Accession No. ML14204A004) has not resolved the Committee's concerns regarding SRP Chapter 19 and SRP Section 17.4 and the NRC's current endorsement of ASME/ANS Capability Category I.

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The NRC staff acknowledges the opportunity for further improvements in its guidance to applicants for design certifications or combined licenses with respect to the treatment of risk-significant nonsafety-related SSC, as well as the technical adequacy of PRAs required in accordance with Title 10 of the *Code of Federal Regulations* Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants." Consequently, the NRC staff would like to discuss further the Committee's recommendations and will work with the ACRS to schedule this interaction.

Sincerely,

/RA/

Mark A. Satorius
Executive Director
for Operations

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Ostendorff
Commissioner Baran
Commissioner Burns
SECY

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