



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, DC 20555 - 0001**

February 20, 2015

Mr. Mark A. Satorius
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**SUBJECT: DRAFT FINAL GENERIC LETTER 20XX-XX, "TREATMENT OF
NATURAL PHENOMENA HAZARDS AT FUEL CYCLE FACILITIES"**

Dear Mr. Satorius:

During the 621st meeting of the Advisory Committee on Reactor Safeguards, February 5-7, 2015, the Committee reviewed the staff's Generic Letter 20XX-XX, "Treatment of Natural Phenomena Hazards at Fuel Cycle Facilities." We also had the benefit of the documents referenced.

RECOMMENDATION

Generic Letter 20XX-XX, "Treatment of Natural Phenomena Hazards at Fuel Cycle Facilities" should be issued.

BACKGROUND AND DISCUSSION

The NRC staff has conducted inspections of selected nuclear fuel cycle facilities to confirm licensees are in compliance with applicable regulatory requirements and license conditions, particularly with regard to their abilities to respond to events initiated by or related to natural phenomena. Immediate threats to safety identified in the inspections have been addressed. However, the staff has found that as a generic matter, licensees could not confirm the compliance of their facilities. The staff has prepared the Generic Letter to request that within 90 days licensees provide:

- Definitions of likelihood ranges for natural phenomena events addressed in the facility Integrated Safety Assessments,
- Descriptions of safety assessments for the licensing and design basis natural phenomena events,
- Descriptions of possible changes in methodologies, likelihoods, and severities of natural phenomena events from those used in the original design and evaluation of facilities, and
- Summaries of results of any facility "walkdowns" or assessments to identify degraded, nonconforming, or unanalyzed conditions that can affect the performances of the facilities in response to natural phenomena.

Should licensees conclude that changes are needed in the safety assessments of facilities' performance in response to natural phenomena, the licensees are to submit plans for staff review within 180 days.

Licensees have concluded that the time frames proposed in the Generic Letter are adequate because the staff has kept them well informed as the Generic Letter was developed. The staff is confident it has resources to review in a timely fashion submittals provided by licensees in response to the Generic Letter.

Clear definitions of the licensing bases of nuclear fuel cycle facilities and justifications of assumptions used in their safety assessments are essential for assuring that these facilities provide adequate protection of the public health and safety and to the environment. The Generic Letter should be issued.

We look forward to continued interactions with the staff once they have received and reviewed the licensee submittals. Decisions on the need for further regulatory actions with regard to the nuclear fuel cycle facilities and natural phenomena should include considerations of the risks posed by these facilities.

Sincerely,

/RA/

John W. Stetkar
Chairman

REFERENCES

1. NRC Generic Letter 20XX-XX: "Treatment of Natural Phenomena Hazards in Fuel Cycle Facilities" (ML14328A029)
2. NMSS Memorandum, Subject: "Response to Public Comments on Draft NRC Generic Letter 20XX-XX, 'Treatment of Natural Phenomena Hazards at Fuel Cycle Facilities'," December 2014 (ML14328A028)
3. Temporary Instruction 2600/15, "Evaluation of Licensee Strategies for the Prevention and/or Mitigation of Emergencies at Fuel Facilities," September 30, 2011 (ML111030453)

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