

## Process Overview for Implementation of Order EA-12-051

### Summary:

The NRC is ensuring U.S. nuclear power plants efficiently and effectively implement the Reliable Spent Fuel Pool Instrumentation Order by providing guidance for compliance, evaluating implementation plans, and conducting inspections once compliance is achieved.

### Background:

- NRC's Order EA-12-051, "Order Modifying Licenses with Regards to Reliable Spent Fuel Pool Instrumentation" (ADAMS Accession No. [ML12056A044](#)), requires licensees to install reliable instrumentation to remotely monitor spent fuel pool level at three discrete levels:
  - normal level.
  - low level, but still high enough to shield workers above the pools from radiation.
  - a very low level, near the top of the spent fuel rods (indicating that more water should be added without delay).
- The industry issued guidance in NEI 12-02 (ADAMS Accession No. [ML12240A307](#)).
- NRC endorsed NEI 12-02, with exceptions, in [JLD-ISG-2012-03](#).
- Activities associated with review of the implementation of this order have been merged with those associated with EA-12-049 (Mitigation Strategies Order).

### Process Overview:

The process for compliance with EA-12-051 includes the following elements:

- Licensees submit overall integrated plans (OIP) for spent fuel pool level instrumentation (updated every six months) describing:
  - Range of spent fuel pool levels that will be monitored.
  - Design features, including instrument description, mounting, arrangement, qualification, testing, power supplies, and other aspects.
  - Program features, including personnel training, procedures, testing, and calibration.
- NRC staff will evaluate the OIP and issue interim safety evaluations (ISEs):
  - NRC staff will issue questions and perform regulatory audits following LIC-111.
  - With the ISE and audit notes, NRC staff will generate a post-audit ISE.
- After all changes are made, the licensee will submit a final implementation plan (FIP):
  - NRC staff review the FIP using the ISE and post-audit ISE as guidance.
  - NRC staff issues final safety evaluation report on FIP.
- The NRC will conduct post-compliance inspection using Temporary Instruction 2515/191 (ADAMS Accession No. [ML14273A444](#)).

### References:

Additional information about actions to comply with Order EA-12-051 can be found on the "[Implementation Status](#)" page under the Japan Lessons Learned section of the NRC public Web site.