

Draft JLD-ISG-2015-01 Clarifications and Exceptions – NEI 13-02 Draft 0E2

ISG Section	Clarification or Exception	NEI 13-02 Section	Proposed Resolution	Industry Discussion
4.1	With respect to the first method of compliance that includes a severe accident capable drywell vent without SAWA, there are potential longer-term issues related to the CPRR rulemaking should a licensee decide to pursue this option	3	Revise Section 3 of NEI 13-02	Industry acknowledges potential impacts of choosing this option and the on-going CPRR rulemaking. The guidance in NEI 13-02 for the first compliance method has been modified to alert licensees that may consider this method of compliance that there may be longer term impacts from CPRR rulemaking that may include water addition similar to SAWA requirements.

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4.2	In regard to the second method of compliance, the guidance does not contain sufficient functional requirements for SAWA. The staff believes that the functional requirements of Order section B.1 provide a logical starting point for SAWA functional requirements.	4.1, 4.2, 5 and 6	Revise Sections 4.1, 4.2, 5 and 6 of NEI 13-02 to include SAWA functional requirements under Order Section A. Where a Section A functional requirement is not applicable to SAWA, guidance will be provided.	<p>Industry agrees that most of the functional requirements of Order Section A can be made applicable to SAWA. The applicability of Order Section A requirements to SAWA will be referenced in the applicable sections of NEI 13-02.</p> <p>Industry considers SAWA and SAWM to be compliance methods under Order Section B.2. As such, Section B.1 is not applicable. However, the industry agrees that the SAWA to support either the 545°F SADV or SAWM should consider the functional requirements under Order Section A. Since Order Section B.1 points back to Section A for functional requirements of an SADV, the staff’s objective of defining the appropriate SAWA functional requirements is met, since it’s the same SAWA regardless of whether SAWM or the 545°F SADV is selected.</p>

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4.3.1	<p>With respect to wetwell vent preservation time, an acceptable approach for Phase 2 could be for licensees to develop procedures and functional requirements for installed and portable equipment, including instrumentation, supporting SAWM and venting from the wetwell for the same 7-day period previously agreed upon for Phase 1.</p> <p>If <7 days, the guidance could direct licensees to submit for staff review, their potential success paths to establish an alternate heat removal system in the desired time period.</p>	Appendix C Section C.7	Revise Appendix C, Section C.7 to provide guidance for a three tiered approach for demonstrating effectiveness of SAWM.	<p>Industry will make changes to NEI 13-02 Appendix C to address the ISG exception.</p> <p>Tier 1 – show SAWM maintains containment pressure below PCPL for 7 days of Sustained Operation without the need for a drywell vent.</p> <p>Tier 2 – show SAWM maintains containment pressure below PCPL for ≥ 72 hours but less than 7 days until alternate containment heat removal and pressure control is established. A functional description of how alternate containment heat removal and pressure control will be established will need to be provided in the Phase 2 OIP.</p> <p>Tier 3 – show SAWM maintains containment pressure below PCPL for <72 hours until alternate containment heat removal and pressure control is established. A detailed description, including necessary permanent plant modifications, of how alternate containment heat removal and pressure control and procedures for implementation will need to be provided in the Phase 2 OIP.</p>

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4.3.2	<p>The guidance should instruct licenses to identify and include in their OIPs possible means of providing the alternative pressure control.</p> <p>If the licensees determine that drywell venting would be a necessary accident management function after the wetwell vent is flooded and within 7 days of the onset of the accident, licensees should submit for the staff review, one or more possible success paths to establish an alternate containment pressure control as discussed in [draft ISG] Section 4.3.1. The discussion should address the equipment required and any permanent modifications required to enable drywell vent system operation during a severe accident.</p>	1.2 and 1.3	Guidance related to possible use of a non-severe accident capable drywell vent within either the 7 day Sustained Operation period or before alternate containment heat removal and pressure control is established will be removed.	Any discussion of post severe accident use of the drywell vent that is not severe accident capable per Order EA-13-109 has been moved to Section 1.3, Procedure Interface. Existing and future EPG/SAGs will contain guidance for containment venting, which may include the drywell, post core damage either with or without AC power. This Order applies under a specific condition of ELAP with significant core damage while the EPG/SAGs address a broad spectrum of accident scenarios. Possible drywell venting described in Section 1.3 is only applicable after Order EA-13-109 objectives have been met, i.e., 7 days of Sustained Operation or until alternate containment heat removal and pressure control is established and will be guided by actions within the EPG/SAGs including consideration of the presence of combustible gas and potential for radioactive release.

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4.3.3	NEI 13-02 should include guidance regarding functional requirements such as how power to the required instruments is ensured during the first 24 hours following onset of the accident.	Appendix C C.8 Appendix I I.1.6	Guidance to be added to NEI 13-02 to address the need for powering this equipment through the period of Sustained Operation that includes the first 24 hours from the onset of the accident.	Section C.8 and I.1.6
4.4	EPRI Technical Report 3002003301, Technical Basis for Severe-Accident Mitigating Strategies (NEI 13-02 Draft 0E2 Reference 27) has not been made available for NRC review.	Various	No change made to NEI 13-02	EPRI is planning to release a summary report by the end of April, 2015, with the detailed technical report to be released early summer 2015. The results of the EPRI technical analysis were presented to the NRC in an open meeting on December 11, 2014 (ML14345A010).
4.5	Information discussion related to EPG/SAGs will not be endorsed	1.3	No change made to NEI 13-02	Industry acknowledges the NRC position on this item. It does not adversely impact guidance contained in NEI 13-02.
4.6	Information discussion related to Generic Letter 89-16. NEI 13-02 Appendix E contains no information on the guidance related to the design and implementation of the HCVS required by Order EA-13-109. It has not been reviewed and not within the scope of the ISG	Appendix E	No change made to NEI 13-02	Industry acknowledges the NRC position on this item. It does not adversely impact guidance contained in NEI 13-02.

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4.7	This section of the ISG addresses clarifications to the qualifications for instruments supporting HCVS function. A very similar clarification was made in JLD-ISG-2013-02 for Phase 1 (ML13304B836)	4.1 and 4.2 Appendix C Appendix I	<p>No change made to NEI 13-02</p> <p>Recommend same language as Phase 1 ISG.</p>	<p>Industry requests that the wording in the draft ISG be made the same as the wording in the ISG issued for Phase 1, or indicate why different wording is utilized, particularly with the closing paragraph of the section.</p> <p>Phase 1 ISG Section 6.7:</p> <p>With the above instrument considerations, the staff is endorsing the HCVS design in NEI 13-02, and will evaluate the design features details when submitted as part of the overall integrated plan.</p> <p>Preliminary Draft Phase 2 ISG Section 4.7:</p> <p>With the above instrument considerations, the staff will evaluate the licensee’s proposed design details in their OIPs, and will find them to be acceptable, if they conform to the order requirements and to the criteria described above.</p> <p>Draft Phase 2 ISG Section 4.7:</p> <p>Paragraph deleted.</p>

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4.8	The NRC staff is not providing a blanket endorsement of the references when they are intended to support methods for implementing the HCVS under Order EA-13-109.	8	No change made to NEI 13-02	Industry acknowledges the NRC position on this item. It does not adversely impact guidance contained in NEI 13-02.
4.9	The staff emphasizes that the definitions in Appendix A to NEI 13-02 are intended only for their use within NEI 13-02 and acknowledge that some terms, including “stable state” are used in other contexts (such as NRC regulation 10 CFR 50.54(w)(4)(i))	Appendix A	<p>Change “Stable State” to “HCVS Stable State” to address the specific issue of concern with 10 CFR 50.54(w)(4)(i).</p> <p>Add a clarifying statement at the beginning of Appendix A.</p> <p>The definitions provided in this Appendix are intended for use within the context of this document for implementing Order EA-13-109 requirements and should not be applied to other documents where these are similar to terms used.</p>	<p>Industry acknowledges the NRC position on this item, but desires to close the gap with respect to particular definitions causing this to be considered an open item requiring further discussion. Industry thinking is that the definition of Stable State, as used in the context of NEI 13-02 guidance, is an important part of the Phase 2 SAWM strategy objective. Changing the term from “Stable State” to “HCVS Stable State” is intended to address the concern yet retain the concept embodied by this definition as used in the context of NEI 13-02 draft 0F2.</p> <p>Pending closure of this open item, industry is requesting similar wording in the final ISG for Phase 2 as it appears in the final ISG for Phase 1, JLD-ISG-2013-02 for Phase 1 (ML13304B836). The wording in the final ISG for Phase 1 as it relates to Appendix A – Glossary of Terms, does not adversely impact guidance contained in NEI 13-02.</p>