

STEVEN P. KRAFT
Senior Technical Advisor

1201 F Street, NW, Suite 1100
Washington, DC 20004
P: 202.739.8116
spk@nei.org
nei.org



NUCLEAR ENERGY INSTITUTE

3/10/2015
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April 9, 2015

Ms. Cindy K. Bladey
Chief, Rules, Announcements, and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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Subject: Nuclear Industry Comments on U.S. Nuclear Regulatory Commission Draft Interim Staff Guidance JLD-ISG-2015-01, "Compliance with Phase 2 of Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions," *80 Fed. Reg. 12649*, March 10, 2015; Docket ID: NRC-2015-0048.

Project Number: 689

Dear Ms. Bladey:

On behalf of the nuclear industry, the Nuclear Energy Institute (NEI)¹ is pleased to provide the U.S. Nuclear Regulatory Commission (NRC) comments on the draft March 2015 Interim Staff Guidance "Compliance with Phase 2 Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions" (JLD-ISG-2015-01)(Draft ISG). In general, the industry and NRC staff appear in alignment on most of the guidance.

The industry compliments and thanks the NRC staff for a fruitful series of public meetings and conference calls dating back to the development of Order EA-13-109. Designing and planning for operation of systems following a severe accident² is a complex matter. This is especially so when developing guidance for implementing an Order that requires a severe accident capable containment vent system that includes both

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

² Severe accident conditions include the elevated temperatures, pressures, radiation levels, and combustible gas concentrations, such as hydrogen and carbon monoxide, associated with accidents involving extensive core damage, including accidents involving a breach of the reactor vessel by molten core debris.

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a wetwell vent and a drywell vent or a strategy that makes it unlikely venting from the drywell would be needed before alternate reliable containment heat removal and pressure control is established.

As noted in several locations in the draft ISG, further discussion between the NRC staff and industry was required to resolve several open issues. Since the issuance of the draft ISG, the NRC staff and industry have continued to meet in public and seek to resolve the open issues. It has been through these engagements and the documents provided (draft revisions of NEI 13-02, presentations and comment resolution matrices) that the industry has provided comments on the draft ISG and additional NRC staff comments, as follows:

- On December 10, 2014, NEI provided the NRC NEI 13-02, Revision 0E2, for endorsement.³
- In addition to issuing the draft ISG, NRC staff provided comments on NEI 13-02, Revision 0E2, in the form of in-text mark-up and comments.⁴
- The industry provided proposed resolution of the NRC staff comments at the public meeting on March 16, 2015.⁵
- On March 20, 2015, both the NRC staff and industry briefed the ACRS Fukushima Subcommittee on the EA-13-109 Phase 2 guidance, which provided additional comments and insights on the industry guidance.⁶
- Based on the discussions at the March 16 and March 20 meetings, on March 24, 2015 the industry provided NEI 13-02, Revision 0F4, and a comment resolution matrix detailing the changes in NEI 13-02 from Revision 0E2 to 0F4 for NRC staff review.⁷
- On April 2, 2015, NRC staff provided comments on NEI 13-02, Revision 0F4, in the form of in-text mark-up and comments.⁸
- On April 2, 2015, the NRC held a public conference call to discuss with the industry the NRC staff comments on NEI 13-02, Revision 0F4.
- As a result of the April 2 call, on April 8, 2015, the industry provided a comment resolution matrix showing proposed resolution of NRC staff comments on NEI 13-02, Revision 0F4.⁹

The documents provided by the industry that supported the listed engagements among NRC staff, ACRS, the industry and interested members of the public constitute our comments on the draft ISG.

³ Letter, Steven P. Kraft (NEI) to Dr. Rajender Auluck, *Transmittal of NEI 13-02, Industry Guidance for Compliance with Order EA-13-109, Revision 0E2, December 2014*, December 10, 2014.

⁴ Nuclear Regulatory Commission (NRC) ADAMS Accension No. ML 15054A355.

⁵ Meeting, NRC, *Meeting to Discuss Activities Associated with Implementation of Near-Term Task Force Recommendation 5.1 Related to Containment Venting Systems*, March 16, 2015.

⁶ Meeting, Advisory Committee of Reactor Safeguards (ACRS) Fukushima Subcommittee, *Meeting on ISG Phase 2 in Support of Order EA-13-109 (Reliable Hardened Vents)*, March 20, 2015.

⁷ Email, Phillip M. Amway (Exelon) to Rajender Auluck (NRC) and Weidong Wang (ACRS staff), *Industry Guidance for HCVS Order EA-13-109 Phase 2 – NEI 13-02 Draft 0F4*, March 24, 2014 (Note: Mr. Amway transmitted documents to NRC on behalf of NEI and the nuclear industry.).

⁸ Email, Rajender Auluck (NRC) to Steven P. Kraft (NEI), *Additional Comments*, April 2, 2015.

⁹ Email, Steven P. Kraft (NEI) to Rajender Auluck (NRC), *Latest Documents*, April 8, 2015.

Ms. Cindy K. Bladey

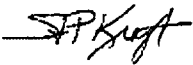
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In conclusion, we reiterate our appreciation for the constructive engagement by the NRC staff in developing the guidance for implementation of Phase 2 of EA-13-109. NEI also wants to recognize the vital contributions of the Boiling Water Reactor Owners' Group (BWROG)¹⁰ to this effort. We look forward to hearing back from the NRC staff on the industry resolution of NRC comments on NEI 13-02, Revision 0F4, so we may finalize the industry guidance, which will be transmitted to NRC for final endorsement.

Please do not hesitate to contact us if there are additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "SP Kraft", written in a cursive style.

Steven P. Kraft

¹⁰ The BWR Owner's Group provides a forum where utility members can achieve higher plant reliability, maintain and improve plant safety, minimize and share costs, and facilitate regulatory interaction.