

September 17, 2015

Mr. Andrew Mauer  
Senior Project Manager  
Nuclear Energy Institute  
1201 F Street NW, Suite 1100  
Washington, DC 20004

SUBJECT: ENDORSEMENT OF ELECTRIC POWER RESEARCH INSTITUTE FINAL DRAFT REPORT 3002004396, "HIGH FREQUENCY PROGRAM: APPLICATION GUIDANCE FOR FUNCTIONAL CONFIRMATION AND FRAGILITY"

Dear Mr. Mauer:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to the Nuclear Energy Institute (NEI) letter<sup>1</sup> dated July 30, 2015, with attached Electric Power Research Institute (EPRI) Report No. 3002004396 entitled, "High Frequency Program: Application Guidance for Functional Confirmation and Fragility" (hereafter referred to as the High Frequency Guidance Report). The NEI letter was submitted to support licensee responses to Enclosure 1 of the March 12, 2012, information request<sup>2</sup> that was issued pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) (hereafter referred to as the 50.54(f) letter). The 50.54(f) letter was issued as part of the lessons learned from the accident at the Fukushima Dai-Ichi nuclear facility.

The NRC staff interacted with the stakeholders on the development of the High Frequency Guidance Report with a focus on applying high frequency seismic test results (EPRI 1025287) to support completion of high frequency confirmations for sites with re-evaluated seismic hazard exceedances above 10 Hertz. The High Frequency Guidance Report is the product of significant interaction between the NRC, NEI, EPRI, and industry stakeholders, at five public meetings.<sup>3</sup> These interactions and the insights gained from the meetings allowed for the development of this document in an effective and transparent manner. The meetings helped develop the expectations for how licensees would perform high frequency confirmations.

The NRC staff has reviewed the High Frequency Guidance Report and found the guidance to be an acceptable method for licensees to use when responding to NRC Requested Information item (4) in Enclosure 1 of the 50.54(f) letter. Licensees may use the High Frequency Guidance Report in addition to the SPID guidance, as an acceptable approach for responding to the information requested. Licensees are encouraged to adopt EPRI Report 3002004396 without

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<sup>1</sup> The letter can be found at Agencywide Documents Access and Management System (ADAMS) Accession No. ML15223A095.

<sup>2</sup> The 50.54(f) letter is available in ADAMS under Accession No. ML12053A340.

<sup>3</sup> Public meetings were held on October 27, 2014, February 11, 2015, March 31, 2015, May 21, 2015, and July 15, 2015 (meeting summaries can be found at ADAMS Accession Nos. ML14307B726, ML15104A065, ML15111A019, ML15147A677, ML15208A039, respectively).

deviation to expedite the review process. Licensee deviations from the application guidance should be discussed in their high frequency confirmation submittal.

The NRC staff notes interactions are planned with NEI and industry stakeholders to develop a high frequency confirmation submittal template. The submittal template is expected to include a plant-specific description of stable condition sufficient to justify that the equipment list identified to achieve this state adequately encompasses the scope. Near-term development of a submittal template and example plant-specific descriptions of stable condition are important for the successful implementation of the High Frequency Guidance report and will play a key role in reducing the need for requests for additional information during the staff review.

As a preliminary implementation schedule for high frequency confirmation, the NRC staff agrees with the industry's implementation schedule proposed in NEI's July 30, 2015, letter. The final implementation schedule for this activity will be issued by the NRC in subsequent communications as part of an integrated implementation schedule for the remaining Near Term Task Force 2.1 Seismic assessments.

If you have any questions, please contact Mr. Stephen Wyman at 301-415-3041 or by email at [Stephen.Wyman@nrc.gov](mailto:Stephen.Wyman@nrc.gov).

Sincerely,

*/RA/*

Jack R. Davis, Director  
Japan Lessons-Learned Division  
Office of Nuclear Reactor Regulation

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Sincerely,  
**/RA/**  
 Jack R. Davis, Director  
 Japan Lessons-Learned Division  
 Office of Nuclear Reactor Regulation

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\*concurrence via e-mail

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