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RULES AND DIRECTIVES
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Ms. Cindy K. Bladey
Office of Administration
OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments on Draft Regulatory Issue Summary (RIS) 2015-## "Clarification of 10 CFR 50.46 Reporting Requirements and Recent Issues with Related Guidance Not Approved for Use by the NRC" (Docket ID NRC-2015-0172)

Project Number: 689

Dear Ms. Bladey:

In the July 24, 2015, Federal Register Notice (80FR44160) the U.S. Nuclear Regulatory Commission (NRC) requested public comments on the Draft RIS 2015-## "Clarification of 10 CFR 50.46 Reporting Requirements and Recent Issues with Related Guidance Not Approved for Use by the NRC". (ML15057A346) This letter forwards for NRC consideration comments compiled by the Nuclear Energy Institute (NEI).¹

Our overarching comment is that the RIS contents focus on the two primary functions:

- 1) Providing reporting requirements (paragraph (a)(3)), and
- 2) Providing acceptance criteria (paragraph (b)).

Specific comments are submitted in the attachment; however, NEI requests particular attention to providing clarity for the following items:

- Reporting requirements for certain non-significant changes to, and errors discovered in, Emergency Core Cooling System (ECCS) Evaluation Models.
- What constitutes a "change" for the purposes of reporting.

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

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- When the 30-day reporting period begins for certain significant changes.
- Clearly distinguishing between an input parameter and an element of the method of evaluation.

The NRC staff identified three specific issues with NEI 07-05, "10 CFR 50.46 Reporting Guidelines". Comments specific to these issues are also provided in the attachment.

The industry supports the idea of further interactions with the NRC in workshops, teleconferences, and meetings to use all the resources available to facilitate completion of this document. If you have any questions or require additional information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Gordon A. Clepton", with a stylized flourish extending to the right.

Gordon A. Clepton

Attachment

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"Clarification of 10 CFR 50.46 Reporting Requirements and Recent Issues with Related Guidance Not Approved for Use by the NRC"
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1	General	<p>Regulation 10 CFR 50.46 has two primary functions: 1) to provide reporting requirements in paragraph (a)(3) and 2) provide acceptance criteria in paragraph (b).</p> <p>10 CFR 50.46 is not a change control rule. 10 CFR 50.59 provides criteria for making changes to methods of evaluation and when NRC approval is required. In comparison, 10 CFR 50.46 does not provide such criteria.</p> <p>In the guidance for the implementation of 10 CFR 50.59 in Revision 1 of NEI 96-07, as endorsed by Regulatory Guide 1.187, there is a clear distinction between an input parameter and an element of the method of evaluation. 10 CFR 50.46 does not provide such a distinction.</p> <p>10 CFR 50.46 uses the term "Acceptable Evaluation Model" several times. The rule provides no clear definition of the process for acceptance of an Evaluation Model or acceptance of changes to an Evaluation Model. The only reference to a process may be in paragraph (a)(2) that refers to "... evaluations of ECCS cooling performance <i>submitted...</i>".</p> <p>While not formally defined in 10 CFR 50.2, "Definitions", paragraph (c)(2) of 10 CFR 50.46 describes or "defines" an Evaluation Model as being the "calculational framework" and the "calculation procedure". This description implies that the Evaluation Model is a process. Paragraph (c)(2) uses the expression "... procedure for treating input and output information ...". Again, this describes a process, not values of plant-specific inputs or input parameters.</p> <p>Paragraph (c)(2) also uses the expression "values of parameters" as being part of the Evaluation Model. This</p>	<p>Consider clarification within the RIS of the use of an evaluation model to ensure consistency with definitions in 10 CFR 50.46(c)(2).</p>

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		<p>expression has been a source of confusion. It is not clear from the definition of an Evaluation Model in paragraph (c)(2) what is meant by a “parameter”. Mathematically, a parameter is a quantity that influences the behavior of a mathematical function. An example would be the coefficients in the Baker-Just equation for calculating the metal-water reaction rate as described in 10 CFR 50, Appendix K. In this case, the parameters (coefficients) would be considered part of the Evaluation Model. This is analogous to an element of a method of evaluation in 10 CFR 50.59 as opposed to an input or input parameter.</p> <p>The concept of an “Acceptable Evaluation Model” is not clear. Acceptance of models (or methods of evaluation as referred to in 10 CFR 50.59) is typically through the issuance of a Safety Evaluation Report (SER) by the NRC whereby the NRC approves the method for an intended application as in 10 CFR 50.59(a)(2)(ii). Such methods are typically submitted as topical reports by vendors to the NRC for review and acceptance/approval. In the topical reports, as well as in the review and acceptance process, plant-specific inputs or parameters are not typically included. Therefore, plant-specific inputs or parameters cannot be considered part of the Evaluation Model.</p> <p>In the proposed rulemaking (64 FR 53270, October 1, 1999) related to the revision of 10 CFR 50, Appendix K of NEI submitted comments on the proposed rulemaking in a letter dated December 15, 1999 (ML003671779). NEI Comment 8 addressed the following statement in the Section-by-Section Analysis of the proposed change: “Estimated changes in ECCS performance due to revised analysis inputs are reported under 10 CFR 50.46 (a)(3),</p>	

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		<p>at least annually."</p> <p>NEI sought to clarify the applicability of the reporting requirements in paragraph (a)(3). In particular, NEI argued that paragraph (a)(3) does not apply to changes in the Peak Clad Temperature (PCT) resulting from plant-specific analysis input parameter values. NEI proposed revised rule language to clarify this.</p> <p>In the publication of the final rule, the NRC disagreed with the NEI proposal and took the position that "... the ECCS evaluation model is comprised of the computer code or codes, the input parameters (including plant-specific design parameters), and the calculational results." (65 FR 34918, June 1, 2000).</p> <p>This position further indicates continued disagreement on what constitutes an Acceptable Evaluation Model. As discussed previously, the definition in paragraph (c)(2) does not include plant-specific information. Further, contrary to the statement above from 65 FR 34918, the definition in paragraph (c)(2) does not include calculational results.</p>	
2	General	<p>The Draft RIS would benefit by better organization of the information. The use of "NRC Staff Position" is unclear whether it was previously stated or is being repeated herein. For example, "NRC Staff Position" is used on page 3 of 9 prior to the section that describes the NRC Staff Position. Even more, the NRC Staff Position is intermingled with the Summary of the Issue. Separation of these would provide better clarity. Finally, the last paragraph in the Background Information would be better placed after the first paragraph in that section.</p>	<p>Reorganize the RIS to provide improved clarity and cite specific docketed examples of "NRC Staff Position".</p>

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3	General	A statement should be provided relative to potential future changes in reporting under the draft 10 CFR 50.46c and their intent to clarify the language such that the RIS would no longer be needed.	Recommend that a statement be added to clarify what future changes provided by 10 CFR 50.46c would to sunset the RIS.
4	General	The definition of “application” is both incorrect and inconsistent with the 1988 ECCS Rule SOC.	Revise the definition of “application” to be consistent with the 1988 ECCS Rule SOC
5	General	<p>The following items are not addressed in the Draft RIS:</p> <ul style="list-style-type: none"> • The wording of the rule (i.e., “<i>acceptable</i> evaluation model,” “last <i>acceptable</i> model,” “proposed schedule for <i>providing a reanalysis</i>,”) is frequently and inappropriately inferred to require regulatory action that is not required by any rule. • Ambiguous characterization of a “change to or error discovered in ... a model that affects the temperature calculation.” Is reporting required for changes/errors that have no effect on the PCT calculation result? • Treatment of offsetting changes as compared to the last acceptable analysis (e.g., changes due to installation and removal of lead test assemblies, as discussed in the public meeting). • What constitutes the “last acceptable model,” – last NRC SE, last biannual report, last 30-day report or other? • Repeated 30-day reports for inconsequential changes due to the “sum of the absolute magnitudes” exceeding 50 °F. 	Recommend clarification on these bullet points be provided within the RIS.

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6	General	<p>The stated intent of the Draft RIS is to provide clarification with regards to the language in 10 CFR 50.46(a)(3). The Draft RIS was initiated in response to “recent inspection and review activities.” Additional clarification is needed within the Draft RIS to complete this endeavor.</p> <p>The proposed language on reporting requirements in 10 CFR 50.46c is different than the current language. It appears that the Staff concludes that the following differences (not inclusive of all differences) are necessary to clarify the intent of the future reporting requirements.</p> <ul style="list-style-type: none"> • “estimate” vice “predicted response” • “acceptable” vice “NRC-approved” • “...or in the application of such a model” vice “...or the application of such a model, or any operation inconsistent with the ECCS evaluation model...” • “If the change or error is significant,...a proposed schedule for providing a reanalysis or taking other action as may be needed to show compliance...” vice “...but is significant, then a report describing each such change, error, or operation, and a schedule for submitting a reanalysis and implementation of corrective actions must be submitted within 30 days of the change, discovery of the error, or operation.” <p>Within the Draft RIS the arguments for some language are inconsistent. With regards to “application”, the discussion on page 4 of 9 of the Draft RIS rebuts the use of application to mean analysis of facility changes and indicates that it is the extension of the (evaluation)</p>	Provide clarity to these identified items within the RIS.

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		<p>model beyond the range intended. Whereas, the discussion on page 5 of 9 of the Draft RIS clearly states that “application” is “...the act of putting an evaluation model to use.” (Note: the Draft RIS does not provide a basis for the “broader, plain-language definition.”) These are clearly different meanings to the use of application.</p>	
7	General	<p>Once issued, this RIS will be in effect until all plants are licensed under the proposed rule 10 CFR 50.46c. A five year time frame for review of the RIS for efficacy is not reasonable if outstanding items that require clarity are identified, affect reporting, and are not resolved.</p>	<p>Consider a review timeframe shorter than five year for the RIS to ensure items requiring clarification are resolved in a timelier manner.</p>
8	<p>“Background Information,” page 1 of 9 (footnote 1)</p>	<p>10 CFR 50.46 and Draft RIS do not provide clear and complete direction with regard to when the 30-day reporting period begins for certain significant changes to Emergency Core Cooling System (ECCS) Evaluation Models, specifically those that arise from discretionary plant design modifications.</p> <p>In the case referenced in the Draft RIS, the NRC determined that the 30-day reporting period began at discovery, which corresponded with initiation of a documented Condition Report (CR) within the licensee’s corrective action process. This determination is analogous to the concept of discovery for 10 CFR Part 21 reporting practices and is not in dispute. However, given the NRC’s position in the Draft RIS that certain plant-specific inputs and design parameters are, by definition, part of ECCS Evaluation Models or applications thereof, the implication of this position is that certain significant changes to ECCS Evaluation Models and their applications</p>	<p>It is recommended to expand the discussion of reporting requirements in the RIS to state the policy with regard to reporting of discretionary plant design changes.</p> <p>The need for consistent guidance is particularly acute for major modifications that have significant effects on PCT pursuant to 10 CFR 50.46(a)(3)(ii), but are planned, controlled, and executed outside of a licensee’s corrective process. In such cases, the traditional concept of “discovery” such as that used for errors and their corrective actions would not necessarily apply to determine the start of a 30-day reporting period. It is recommended that policy and guidance also be provided for minor modifications that have non-significant effects on PCT and which may be reported in annual reports pursuant to 10 CFR 50.46(a)(3)(ii).</p> <p>It should be recognized that, without such guidance, licensees may interpret 10 CFR 50.46 in a non-consistent manner and may select different start dates for reporting of discretionary plant design modifications, such as upon management approval of funding, approval of a contract with a vendor, completion of design</p>

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		<p>may also arise from discretionary plant design modifications that are planned, controlled, and executed outside a licensee’s corrective action process, and which are in no way corrective actions pursuant to 10 CFR 50, Appendix B, Criterion XVI. In such cases, the concept of discovery as the starting point for a 30-day report is not defined by either 10 CFR 50.46 nor the Draft RIS.</p> <p>For example, a licensee may decide to implement a design modification that will add heat sinks to a containment building and thereby affect calculated PCT for a postulated Loss of Coolant Accident (LOCA). If that design modification does not otherwise require prior NRC review and approval, then that licensee would not submit a License Amendment Request (LAR) pursuant to 10 CFR 50.90 and instead would report the change pursuant to 10 CFR 50.59 (if only because of the impact of the new heat sinks on calculated post-accident containment pressures and temperatures or containment subcompartment analyses). If reanalysis with an acceptable ECCS Evaluation Model revealed that the calculated PCT would change by 50°F or more, or that the cumulative sum of absolute magnitudes of ΔPCT estimates would change by 50°F or more once the effects of prior changes/errors were taken into account, then the position in the Draft RIS would require that this discretionary plant design modification be reported within 30 days pursuant to 10 CFR 50.46(a)(3)(ii). If the plant design modification is not itself a corrective action for some other deviation, deficiency, or nonconformance, then implementation of the modification would occur outside the corrective action process. In such a case, neither 10 CFR 50.46 nor the Draft RIS define when the</p>	<p>paperwork, 90% design review, beginning or end of physical installation of a modification, turnover to plant operations personnel, etc. For consistency with other licensing requirements, it is recommended that the reporting requirements would start only after both of the following occur: (1) partial or complete physical installation of a modification in the plant; and (2) when the plant’s ECCS is determined to be or declared OPERABLE in accordance with that plant’s Technical Specifications.</p>

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		30-day reporting period would begin.	
9	“Background Information,” page 3 of 9	<p>10 CFR 50.46 and Draft RIS do not provide clear and complete direction with regard to reporting requirements for certain non-significant changes to, and errors discovered in, Emergency Core Cooling System (ECCS) Evaluation Models.</p> <p>Specifically, if a licensee docketed a 30-day report pursuant to 10 CFR 50.46(a)(3)(ii) for a significant change or error that had a 50°F or greater effect on calculated PCT, along with a proposed schedule for providing a reanalysis, and later discovered another non-significant change or error before that reanalysis was complete, it is not clear what actions the NRC would require of the licensee.</p> <p>The 1988 Statement of Considerations (SOC), quoted on page 3 of the Draft RIS, suggests that non-significant changes and errors would not normally be of immediate concern to the NRC, and thus could be reported in the licensee’s next annual report pursuant to 10 CFR 50.46(a)(3)(ii). However, if a licensee had not yet completed corrective action (reanalysis) in accordance with a 30-day report, another interpretation of the regulation may require the licensee to cumulate the absolute magnitude of the effect on PCT for a newly discovered, non-significant change/error with any previously reported changes/errors, thereby effectively reclassifying the new change/error from non-significant to significant and triggering another 30-day report (or an update to the previous 30-day report). Such an interpretation would have the consequence of requiring</p>	<p>It is recommended to expand the discussion of reporting requirements in the Draft RIS to state its policy with regard to reporting of non-significant changes/errors that are discovered following a 30-day report, but prior to completion of corrective action (reanalysis).</p> <p>It is further recommended that a statement be added to the RIS that licensees have three options in such a case, as follows: (1) if the reanalysis will not be complete prior to the licensee’s next annual report, include the newly discovered non-significant change/error in that next annual report along with its estimated effect on PCT; (2) if the reanalysis will be complete prior to the licensee’s next annual report and the newly discovered change/error will not be resolved as part of that reanalysis, then include the newly discovered non-significant change/error in the next annual report along with its estimated effect on PCT; or (3) if the reanalysis will be complete prior to the licensee’s next annual report and the newly discovered change/error will be resolved as part of that reanalysis, then describe the newly discovered non-significant change/error in the next annual report but report its estimated effect on calculated PCT as “Not Applicable” because its impact has already been addressed through reanalysis.</p> <p>It is recommended to state in the RIS that a licensee will not be required to docket a 30-day report pursuant to 10 CFR 50.46(a)(3)(ii) for a change/error that has a 0°F effect on PCT. Such a policy would provide a reasonable balance between the needs of NRC Staff to maintain cognizance with respect to licensee activities and the licensee’s burdens associated with reporting requirements.</p>

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		<p>certain non-significant changes/errors, with a 0°F effect on calculated PCT, to be treated as significant and reported within a 30-day period of discovery because of how cumulative sums are calculated pursuant to 10 CFR 50.46 and the 1988 Statement of Considerations (SOC).</p>	
10	<p>“NRC Staff Position,” page 3 of 9</p>	<p>The “NRC Staff Position” contained in Draft RIS does not, but should, recognize that there may be differences between a bounding or limiting plant configuration that has been analyzed with an acceptable Emergency Core Cooling System (ECCS) Evaluation Model, and an actual as-built or physical plant configuration. This is important because 10 CFR 50.46 requires reporting of certain changes, but does not explicitly define what a “change” is, unlike 10 CFR 50.59.</p> <p>A closer examination of how the word “change” is used in 10 CFR 50.46 suggests that licensees do have some latitude to modify their actual plants without necessarily triggering any reporting requirement pursuant to 10 CFR 50.46. Given the positions described in the Draft RIS, it logically follows that only plant modifications that affect the bounding or limiting inputs used in ECCS performance analyses should be of regulatory interest to the NRC pursuant to 10 CFR 50.46, although certain other reporting requirements (e.g., 10 CFR 50.59) may also apply for such modifications.</p>	<p>It is recommended to expand the discussion of reporting requirements in the RIS to state the policy with regard to what constitutes a “change” for the purposes of reporting.</p> <p>This comment is loosely related to the concepts of “margin management” and “margin ownership.” Clearly, the acceptance criteria adopted in 10 CFR 50.46 (e.g., 2200°F PCT) represent limits that licensees must not violate, and the NRC is the sole owner of any margin between that acceptance criteria and the ultimate cladding performance limit. Licensees, however, should be the sole owners of any discretionary margins between actual plant configurations and analyzed (bounding or limiting) plant configurations. Thus, a modification of the plant configuration or reload core design practices should not be construed as a “change” for the purposes of 10 CFR 50.46 reporting requirements.</p>
11	<p>Summary of Issue, Page 4 of 9</p>	<p>Footnote 8 on page 4 indicates that the RIS has a narrow focus. Use of the phrase “all potential issues associated with the NEI guidance document” indicates that other issues may exist but are not being pursued.</p>	<p>If the other potential issues exist, they should be in the scope of the RIS. If there are no additional specific issues with NEI 07-05 identified, the footnote should be modified to remove this phrase.</p>

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12	Definition of “Application,” pages 4 and 5 of 9	<p>The lack of a definition of “application” in 10 CFR 50.46 is a source of confusion. In the Draft RIS, the NRC disagrees with the definition of “application” in Section 2.2.2 of NEI 07-05. It states that the NEI definition is “inappropriately limiting”. Further, it states: “In contrast to the NEI 07-05 definition, the Staff has consistently applied a broader, plain-language definition, considering ‘application of an evaluation model’ to mean the act of putting an evaluation model to use.” This is contrary to the position taken by the Staff in their response to a commenter in the 1988 ECCS Rule Statements of Consideration (53 FR 35996, September 16, 1988).</p> <p>Specifically, the commenter’s interpretation of the words “or in the application of such a model” was a broader interpretation. In response, the NRC stated: “The regulatory language referred to is intended to ensure that applications of models to areas not contemplated during initial review of the model do not result in errors by extending a model beyond the range that it was intended.” This statement limits the meaning of the word “application”. This is the basis for the definition in NEI 07-05 and is consistent with the 1988 ECCS Rule Statements of Consideration (53 FR 35996, September 16, 1988).</p> <p>The Draft RIS states: “The intent of the statement was not to provide a definition of the word ‘application’ ...”. In the absence of further guidance, licensees have no other recourse but to treat this statement as at least an interpretation or position, if not a definition. Further, with regard to this NRC statement above containing a “plain-language definition”, such a definition does not appear in</p>	Recommend the definition of “application” in NEI 07-05 be incorporated and endorsed within the RIS. This definition is consistent with the interpretation or position in 1988 ECCS Rule Statements of Consideration (53 FR 35996, September 16, 1988).

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		the regulation or other regulatory guidance document.	
13	Definition of “Input Information,” pages 5 through 7 of 9	The terms “input”, “parameter”, “input parameter”, “input information”, “design input”, “model input”, have been used in Federal Register Notices, Regulation, and industry guidance. These terms seem to be used interchangeably. Regardless of the term used, if the value of such a quantity is part of the Evaluation Model submitted to the NRC for review and acceptance, and formed the basis for acceptance and documented as a condition for the use of the Evaluation Model in an SER, it would be considered part of the Evaluation Model. However, if the value of such a quantity does not meet this criterion and is plant-specific, it would not be considered part of the Evaluation Model.	Recommend the definition of “input information” in NEI 07-05 be incorporated and endorsed within the RIS. This definition provides a clear distinction between quantities that are and are not part of the Evaluation Model and, therefore, are or are not subject to the reporting requirements of 10 CFR 50.46(a)(3).
14	Section C, Page 7 of 9	The interpretation of the relationship between 10 CFR 50.46 and 10 CFR 50.59 provides the NRC’s perspective from a 10 CFR 50.46 view point and seems to interject the term “reporting” when the subject is determination of change.	Clarify if both 10 CFR 50.59 and 10 CFR 50.46 can apply to a change and what that means for the Applicability Determination process used as the pre-screen in 10 CFR 50.59 application.
15	Section C, page 7 of 9	The Draft RIS discussion fails to address the distinct differences in the intent of these two rules (10 CFR 50.46 and 10 CFR 50.59). 10 CFR 50.46 does not include requirements for regulatory review of <i>changes</i> to the ECCS analysis. It establishes requirements for the initial calculated cooling performance of the ECCS, and provides guidance for reporting of changes to or errors in that analysis subsequent to “acceptance” by the Staff. The main objective of 10 CFR 50.59 is to allow changes under licensee control if certain criteria are met. The	The referenced passages in the RIS should be changed to correctly address the relationship between the two rules, in that they address different aspects of regulatory requirement and that based on the nature and the effect of a particular change to ECCS model, both rules should be independently applied on their own merits.

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		<p>reporting requirements of 10 CFR 50.59 are only ancillary to the main objective, and require only a summary of changes made under the rule. In the last paragraph of the Draft RIS on page 7 of 9, applying the provisions of 10 CFR 50.59(c)(4) to compare the decision making mechanism provided in 10 CFR 50.59 to the reporting requirements of 10 CFR 50.46 is an inappropriate comparison. Both the position attributed to NEI 07-05 and the interpretation provided in the Draft RIS are incorrect for the following reasons:</p> <ol style="list-style-type: none"> 1. As stated in the Draft RIS “changes to, and errors in, ECCS evaluation models, or applications thereof, made as a result of facility changes under 10 CFR 50.59 are reportable under 10 CFR 50.46(a)(3).” Acceptability of the change under licensee control and satisfaction of other reporting requirements (both from 10 CFR 50.59) do not relax this requirement. 2. Changes to the evaluation model or its application are subject to 10 CFR 50.59 review to the extent that they are described in the UFSAR. That may involve either a change to the evaluation model (method of evaluation, 10 CFR 50.59(c)(2)(viii)) or changes to inputs resulting from design modifications or analytical input (10 CFR 50.59(c)(2)(I – vii)). Regardless of 10 CFR 50.46 other requirements, such changes are subject to the two-year summary reporting requirements of 10 CFR 50.59(d)(2), contrary to the conclusion drawn in the Draft RIS. 	
16	Section 3, page 7 of 9	The Draft RIS states, “...that by not providing timely reporting of all changes and errors to evaluation models,	The RIS should provide guidance on the cumulation of changes and errors.

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		<p>or applications thereof, which results in changes to the PCT of more than 50%, licensees impact the ability of the NRC to determine the safety significance of each error or change.” Licensees have been cited for inconsistent implementation of other aspects of reporting under 10 CFR 50.46.</p> <p>10 CFR 50.46(a)3(i) establishes “...a significant change or error is one which results in a calculated peak fuel cladding temperature different by more than 50 °F from the temperature calculated for the limiting transient using the last acceptable model or is a cumulation of changes and errors such that the sum of the absolute magnitudes of the respective temperature changes is greater than 50 °F.”</p> <p>The Draft RIS does not address what actions allow a re-set of the cumulation of changes and errors. For example:</p> <ul style="list-style-type: none"> • Does the submittal of an annual report that shows the complete list of changes and errors allow a re-zero of the cumulation? • Is a licensee required to maintain the cumulation since the last 30-day report for exceeding 50 F, which could have been 4 years ago? <p>The Draft RIS does not address how to evaluate the impact of a temporary EM change when it is no longer applicable and whether it needs to be counted against the cumulation upon the final removal of the change.</p> <p>For example, consider the assessment of a +14% PCT for introduction of a new fuel product when in a transition core with the current fuel product. This PCT</p>	

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		<p>impact is not applicable for a full core of the new fuel. The PCT penalty is added in cycle N for the first mixed core of the two fuel types. For cycle N+3, a full core of the new fuel is in place and the +14☐ is no longer applicable to the Evaluation Model. The PCT cumulation had included +14 F during the transition cores. In this instance, to reflect the full core of the new fuel product, should the plant now have to take a -14☐ against the cumulation of changes? With this approach, this fuel transition has an absolute change of 28☐ to PCT but no actual change to the Evaluation Model by the end of the fuel transition.</p> <p>For plants that track the cumulation of changes since the last 30-day report (which could have been before the fuel transition started), this 28☐ and other changes or errors could trigger an unnecessary 30-day report.</p>	