



September 21, 2015
NRC:15:037

Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

7/24/2015
SDFR 44160
2

RECEIVED

2015 SEP 22 PM 2:49

RULES AND DIRECTIVES
BRANCH
NRC

AREVA Inc. Response to Request for Public Comment on the Draft Regulatory Issue Summary on Reporting Requirements Related to Analyses of Emergency Core Cooling System Performance, Docket ID NRC-2015-0172

Ref. 1: Draft NRC Regulatory Issue Summary 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.

Dear Ms. Bladey,

AREVA Inc. (AREVA) submits the following comments for consideration by the U.S. Nuclear Regulatory Commission (NRC). These comments are in response to the NRC request for public comment on the Draft Regulatory Issue Summary (RIS) on Reporting Requirements Related to Analyses of Emergency Core Cooling System Performance, Docket ID NRC-2015-0172, (Reference 1).

AREVA comments are as follows:

Comment #1:

The phrase "all other information necessary to specify the calculational procedure" in the 10 CFR 50.46(c)(2) definition of Evaluation Model (EM) does not encompass plant specific input values.

An approved topical report for an Evaluation Model describes the equations, methods, and codes utilized for analyzing LOCA events for a variety of plants. It describes how some plant input parameters would be considered and treated, but does not prescribe the values of input parameters for each individual plant. As such, the only "information necessary to specify the calculational procedure" of the EM are those related to the underlying equations and methods. The individual plant inputs are only necessary in order to exercise the EM for a specific plant design's LOCA demonstration. Therefore, relative to the definition of an EM, plant specific input values are not part of the EM.

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
Add= D. Popova (AXF16)

AREVA INC.

Comment #2:

The consideration of all changes to plant input parameters as reportable is beyond the original intent of the rule.

The Statements of Consideration for the 1988 ECCS Rule change states that the intent of the regulatory language regarding the application of the model was associated with the concern that a change would result in an extension outside the EM's intended use. Therefore, only plant changes that violated the EM's initial range would be considered reportable. In this situation the potential for reporting under both 10 CFR 50.46 and 10 CFR 50.59 would not be duplicative. Based on that stated intent, plant input changes within the EM's acceptable range would not require 50.46 reporting.

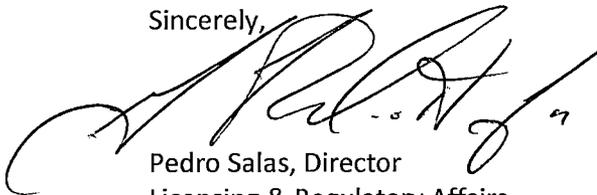
The specific Statements of Consideration text for the 1988 ECCS Rule change is as follows:

"One commenter interpreted the use of the words 'or in the application of such a model' as requiring reporting when facility changes (already reportable under §50.59), resulting in model input changes, occur.

The regulatory language referred to is intended to ensure that applications of models to areas not contemplated during the initial review of the model do not result in errors by extending a model beyond the range that it was intended. The Commission does not believe that further clarification of this requirement is necessary and has not done so in the final rule."

If you have any questions related to this information, please contact Mr. Alan Meginnis by telephone at (509) 375-8266, or by e-mail at Alan.Meginnis@areva.com.

Sincerely,



Pedro Salas, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: J. G. Rowley
Project 728