

October 8, 2015

Mr. Joseph E. Pollock, Vice President  
Nuclear Operations  
Nuclear Energy Institute  
1201 F Street NW, Suite 1100  
Washington, DC 20004

Dear Mr. Pollock:

The U.S. Nuclear Regulatory Commission (NRC) staff has considered a request from the Nuclear Energy Institute (NEI), on behalf of the nuclear industry, to endorse the document entitled, "Hardened Containment Venting System (HCVS) Phase 1 and 2 Overall Integrated Plan Template," Revision 1, dated September 22, 2015, and Frequently Asked Questions (FAQs) 10, 11, 12, and 13 (Agencywide Documents Access and Management Systems (ADAMS) Accession No. ML15273A141).

The purpose of the template is to assist licensees of boiling water reactors with Mark I and II containments in meeting the requirements of Order EA-13-109, "Order Modifying Licenses With Regard To Reliable Hardened Containment Vents Capable of Performing under Severe Accident Conditions" (ADAMS Accession No. ML13130A067). This template is meant to be used in conjunction with NEI 13-02, "Industry Guidance for Compliance with Order EA-13-109," Revision 1 (ADAMS Accession No. ML15113B318). This template also provides references to white papers and FAQs that were developed during preparation of this template. White papers provide additional guidance and/or describe alternate methods for complying with the requirements of Order EA-13-109. The white papers referenced in the template were previously reviewed and endorsed by the NRC staff.

The FAQs provide further clarification and/or interpretation of guidance provided in selected areas of Japan Lessons-Learned Division (JLD) Interim Staff Guidance (ISG) JLD-ISG-2015-01 (ADAMS Accession No. ML15104A118), NEI 13-02, and the overall integrated plan (OIP) template. Since the issuance of the ISG for Phase 2 in April 2015, the NRC staff has held several public meetings and interacted with your staff and external stakeholders during the development of this template. The FAQs 10, 11, 12, and 13, which relate to plant severe accident multiple unit response (HCVS-FAQ-10), plant response during a severe accident (HCVS-FAQ-11), radiological evaluations on plant actions prior to HCVS initial use (HCVS-FAQ-12), and severe accident venting actions validations (HCVS-FAQ-13) were developed as a result of these public interactions.

The NRC staff finds that this template, along with the FAQs, provides an acceptable method for preparation of the OIP for complying with Order EA-13-109. Individual licensees should inform the NRC of their plans to follow this guidance and their implementation approach, as well as their plans to address potential plant-specific issues associated with implementing the order requirements. Licensees are strongly encouraged to follow the guidance in this document in conjunction with NEI 13-02, Rev. 1, and NRC JLD-ISG-2015-01 in order to satisfy the order requirements and improve efficiency of the NRC's review and to minimize the need for requests for information.

J. Pollock

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If a licensee deviates from the guidance, the licensee should justify the deviations and provide information that demonstrates how associated requirements in NRC Order EA-13-109 will be met.

If you have any questions, please contact Dr. Rajender Auluck, of my staff, at (301) 415-1025, or via email to [Rajender.Auluck@nrc.gov](mailto:Rajender.Auluck@nrc.gov).

Sincerely,

***/RA/***

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

J. Pollock

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Sincerely,

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

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