

HCVS Guidance Inquiry Form

A. TOPIC: Severe Accident Venting Actions Validation

Inq. No.: HCVS-FAQ-13

Source document: NEI 13-02 Revision 1

Section: Section 6.1.1.7.4

B. DESCRIPTION:

NEI 13-02 Revision endorsed by JLD-ISG-2015-01 allows the use of the FLEX Verification and Validation process for time sensitive operator actions for EA-13-109 compliance. However, the reference to which V&V process to utilize is not clearly stated.

C. PROPOSED ANSWER: (Include additional pages if necessary. Total pages: 1)

The Validation process referenced in endorsed NEI 13-02, Revision 1 is the Validation plan issued under NEI APC 14-17, dated July 18, 2014 issued to Administrative Points of Contact and Fukushima Points of Contact by Nick Pappas. (07-18-14_APC FPC FLEX Validation.pdf, 07-18-14_071814FLEX Beyond Design Basis Validation Process Guidance Document_Attachment.pdf, 07-18-14_071814FLEX Beyond Design Basis Validation Process Guidance Document_Attachment.docx)

“The enclosed document provides the methodology to be used to document the validity of a site’s FLEX strategies associated with NRC Order EA-12-049. Licensees should use the document to validate Time Constraints as identified in Attachment 1A of the site OIP, “Sequence of Events Timeline.” Additionally, this methodology can be applied to other actions/tasks which are not considered time-sensitive, but may be desired to be validated in order to confirm their feasibility.”

Reevaluated flood and seismic hazard assessment as described below only applies to those portions of the HCVS system that support FLEX (mitigating strategies) (e.g., anticipatory venting using HCVS components to preserve Reactor Core Isolation Cooling (RCIC) functionality). It does not apply to those portions of the HCVS or SAWA that only need to be functional after core damage has occurred (e.g., HCVS purge systems and Systems, Structures or Components (SSCs) supporting SAWA and SAWM functionality that are not dual purposed to also support FLEX (mitigating strategies)).

Licensees should be mindful that the Mitigation of Beyond-Design-Basis Events (MBDBE) rulemaking will reflect the NRC decision that mitigating strategies need to address the reevaluated flood and seismic hazards. Guidance being prepared for Order EA 12-049 (Appendices G (Rev 1) and H (Rev 2) to NEI 12-06) are expected to be applicable for the containment venting systems needed to support mitigating strategies.



D. RESOLUTION: (Include additional pages if necessary. Total pages: 1)

Licensees should perform validations for time sensitive actions using the 07-18-2014 version of the FLEX validation plan not Appendix E of NEI 12-06 revision 1.

Applies to Phase 1 and 2.

Revision: 0

Date: 09-22-2015