

PUBLIC SUBMISSION

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| Comments Due: December 10, 2015 |
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Docket: NRC-2012-0068
Order Modifying Licenses

Comment On: NRC-2012-0068-0015
Mitigation Strategies for Beyond-Design-Basis External Events

Document: NRC-2012-0068-DRAFT-0015
Comment on FR Doc # 2015-28593

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RULES AND REGULATIONS
BRANCH
1-2870

Submitter Information

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11/10/2015

OPR 69702

General Comment

4

See attached file(s)
Note: The attached comments are an update to my comments posted on 12/3/2015 under Comment Tracking Number 1jz-8mlx-nuhd.
Comment 1 has been updated for clarification.

Attachments

JLD-ISG 2012-01 draft R1 comment

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03

Add= S. phelpatt (5X87)

Docket ID NRC-2012-0068

1. Comment to:

main body, Page 5, paragraph titled "Implementation."

Comment:

Add the following sentence: "Licensees that, prior to the issuance date of this ISG, have confirmed compliance with Order EA-12-049 in accordance with JLD-ISG-2012-01, Revision 0, dated August 29, 2012, (ML12229A174), and NEI 12-06 Revision 0, dated August 21, 2012, (ML12242A378), and have received a Safety Evaluation documenting the NRC staff's determination that the licensee's integrated plan will adequately address the requirements of Order EA-12-049, are considered to have provided an acceptable alternative to the requirements of this ISG, and NEI 12-06, Revision 1, including all Appendices.

Basis for Comment:

Licensees that have implemented an integrated plan that has been determined to be acceptable by the NRC staff have already demonstrated compliance with EA-12-049. These licensees have therefore already provided an "acceptable alternative" to the requirements in the revised ISG and revised NEI guide.

2. Comment to

Enclosure Section 3.4 "Programmatic Controls for Unavailability"

Comment:

Change referenced section from 11.5.3 to 11.5.4

Basis for Comment:

NEI 12-06 Section 11.5.3 describes maintenance and testing. NEI 12-06 Section 11.5.4 describes unavailability of equipment and applicable connections.

3. Comment to:

Enclosure Section 6.1, Treatment of Reevaluated Seismic Hazards, Staff Position e.

Comment:

Add the following sentence:

The structure housing the equipment should be evaluated to confirm that, while deformation of the structure is possible, it will protect the equipment at the reevaluated seismic hazard so as to allow deployment of the equipment.

Basis for Comment:

Addition of the sentence is a clarification for consistency with other paragraphs of Section including c., d., and f. Additionally, provides clarification of the phrase "adequate seismic margin to protect the equipment"