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

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Comment on FR Doc # 2015-28593

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FR 69702

General Comment

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See attached file

Attachments

AREVA comments 2015-12-10

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Add= S. Philpott (SXP7)

Comments on Draft Revision 1, to JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events":

1. The Staff Position on Sections 1, 2 and 3 and Appendix E to NEI 12-06, Revision 1A takes exception to the assumption that "Station batteries and associated dc buses along with ac power from buses fed by station batteries through inverters remain available." This appears to go beyond the intent of Order EA 12-049:
 - (a) The proposed revision is inconsistent with the current issued version of JLD-ISG-2012-01 (ML12229A174) which states "Licensees should establish and maintain current estimates of their capabilities to maintain core and SFP cooling and containment functions **assuming a loss of alternate current (ac) electric power to the essential and nonessential switchgear buses except for those fed by station batteries through inverters.**" (emphasis added)
 - (b) The availability of station batteries along with ac power from inverters is assumed in NEI 12-06 and is consistent with the definition of a long term station black out (LTSBO) in SOARCA and other NRC-sponsored analyses. (See SECY-12-0157, NUREG 1935, NTTF Recommendation 4.1, Draft Commission Paper Entitled "Consideration Of Additional Requirements For Containment Venting System For Boiling Water Reactors With Mark I And Mark II Containments".(11/8/2012), and NUREG/BR-0359 "Modeling Potential Reactor Accident Consequences" for examples).
 - (c) The availability of station batteries along with ac power from inverters was discussed in ACRS reviews of the original guidance without additional ACRS recommendations being made that required this assumption.
2. NEI 12-06 has provided contingencies for measurement of key instrument readings using a portable instrument. The ISG has incorrectly suggested that these contingencies are mandatory (to address a loss of ac from inverters):
 - a. These contingencies are for additional failures beyond the scope of NEI 12-06, Section 3.2.1.3 "Initial Conditions." Licensees may elect to allow for additional failures beyond the scope of the Order; however, these provisions should not be made mandatory.
 - b. NEI has recommended portable equipment readings be taken with as little involvement of 'intervening electrical equipment', as possible. The Staff position would result in including intervening equipment that is completely ac independent. An assumption of failure of ac independent equipment that is adequately protected is not required by the Order.
3. The capability to accommodate loss of ac power from batteries in limited areas of plants is addressed in NEI 06-12, *B.5.b Phase 2 & 3 Submittal Guideline*. We do not agree that the B.5.b guidance should be expanded to address concurrent losses of DC power over the

entire site. Further, we note that while individual contingency actions would likely be taken that are the same or similar to the actions for B.5.b., no guidance is provided in the ISG that would endorse such a strategy.