

From: Marshall, Michael
To: [Jim Riley \(jhr@nei.org\)](mailto:Jim.Riley@nei.org)
Cc: [Shams. Mohamed](#)
Subject: RESPONSE REQUESTED: Flooding MSA Template and Examples
Date: Friday, February 19, 2016 11:27:00 AM

Hello Jim,

Below are the NRC staff remaining comments on NEI's flooding MSA template. The NRC staff does not have any additional substantive comment on the template. After the two template comments/questions, I have listed our general observation on examples.

Additional Comments/Questions on the Template

- Page 4, Section 2.3.2, 2nd Bullet and 2.3.3, 1st Bullet: Does the "explanation" referred to in the two bullets include describing why the revised sequence is an appropriate sequence of events?
- Page 4, Section 2.3.2, 5th Bullet and 2.3.3, 8th Bullet: Will the documentation of the validation referred to in the two bullets be available on site for NRC staff use during an audit?

Comment on the Examples

- General Comment: During our review of MSA submittals, the NRC is planning to focus on changes to mitigation strategies reviewed under Order EA-12-049 to address differences between the design basis flood hazard and the reevaluated flood hazard or "alternate" AMS/THMS flood hazard. It would be helpful if explicit statements were included in the examples (i.e., submittals) that list the aspects of mitigation strategies (e.g., equipment, storage location, location of use, etc.) that did not change or did change due to the assessment against the reevaluated hazard or "alternate" AMS/THMS flood hazard. The inclusion of such statement would provide better clarity on which portion, if any, of the mitigation strategies should be reviewed.
- General Comment: It was unclear whether the examples were intended to merely illustrate the implementation of the template or to fully represent an actual submittal that would be provided to the NRC. If the examples were intended to represent an actual submittal, in a number of instances it appears they lack sufficient detail or specificity. For example:
 - G.4.3 Example: On page 4, the second numbered bullet mentions the pre-deployment of AMS equipment (and required FLEX equipment). No description or listing of AMS equipment and associated staging locations or protection from the flood hazard appears to be included in the example.
 - G.4.3 Example. On page 5, the last paragraph mentions that the majority of the AMS strategy relies on the existing FLEX. It is not obvious from the example the differences between mitigation strategies reviewed under Order EA-12-049 and AMS.

- General comment: Regarding associated effects and flood event duration, the template notes that the level of detail should be similar to what would be provided if the associated effects and flood event duration information had been submitted along with the FHRR; however this is not reflected in the examples (particularly Example G.4.3, which contains limited information and assumptions). In addition, to ensure the analysis is traceable so that staff can efficiently review information as part of the audit process, the examples should illustrate the inclusion references to calculation packages associated with the associated effects and flood event duration.

Best Regards,
Michael L. Marshall, Jr.
Senior Project Manager

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Subject: [External_Sender] Flooding MSA Template and Examples

Mo, Mike;

I have attached the latest version of our MSA template that addresses all the comments we have received to date. The changes since the last version we sent you are shown in "Track Changes" mode. Our January 27th webinar identified some continuing concerns with our responses to your comments 9, 10, 35, and 36. I believe that the attached document resolves these comments in a manner that meets your request.

I look forward to your acceptance of this document and your comments on our G.3.A (PLANT

DB=FLEX DB < MSFHI), G.3.B (PLANT DB < FLEX DB < MSFHI), and G.4.3 (AMS) examples that were sent to you on February 2nd.

I will send you a revised version of our G.4.4 (THMS) example that addresses your comments from last December, and an initial version of the G.4.1 (FLEX OK) and G.4.2 (MOD FLEX) examples this Friday. At this point you will have received all the documents that we plan to prepare to support the MSA effort.

We should be scheduling a follow-up meeting or webinar to close out the comments on all these examples in the near future. Please contact me with proposed dates once you have determined when your comments will be completed.

Thank you,

Jim Riley

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