

Associated Effects Reviews for Flooding Focused Evaluations and Integrated Assessment

NEI Fukushima Flooding Task Force

NRC Public Meeting

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Purpose

- Need clarity on FE/IA flood mechanism trigger conditions
- All inputs for the Focused Evaluation/Integrated Assessment need to be established prior to initiation
- Waiting for the closure of the MSA reviews does not support current schedule for FE/IA

Industry Concerns on Associated Effects Review

- Use of MSFHI letters is not consistent with trigger conditions communicated to the industry in the December 3, 2012 NRC letter and in subsequent public meetings
 - Original understanding was that any unbounded flood mechanism parameter (i.e. level, associated effects, and duration) would trigger the need for an IA
 - Any changes to trigger conditions (i.e. flood level only) need to be documented
- NRC staff stated that completion of associated effects reviews is held up by a lack of industry inputs
 - Many sites are not aware that NRC needs additional information
 - Interactions between licensees and NRC needs to occur
 - Need NRC acceptance and confirmation of associated effects and duration parameters prior to start of the FE/IA process

Proposed Path Forward

- ISG clarification should state:
 - “Licensees may use the methodology of NEI 16-05, with clarifications, upon receipt of the NRC letter providing the flood hazard parameters for use in the Mitigating Strategies Assessments of NEI 12-06, Appendix G. Flood mechanisms that are required to be evaluated in the process described in NEI 16-05 are those identified in the interim letters as being non-bounded. For these mechanisms, licensees should confirm that information not explicitly addressed in the interim letters such as the event duration parameters and associated effects have been accepted and documented (e.g. Staff Assessments, Audit Reports, or other official correspondence) by the NRC prior to initiation of the process.”