From: Frumkin, Daniel
Sent: Wednesday, August 03, 2016 2:34 PM
To: ANDERSON, Victoria (vka@nei.org)
Cc: Casto, Greg
Subject: NRC staff comments on FAQ 07-0040, Revision 5 - Non-Power Operations

Victoria,

To facilitate better discussion during the August 9, 2016, public meeting, the NRC staff is providing comments on FAQ 07-0040, Revision 5, ML16193A464.

1. The new section on spent fuel pool cooling starts by discussing that safe and stable means keeping the temperature below boiling. Although this may be consistent with the standard, it is not the licensing basis for all plants. Some plants licensing bases allows boiling of the spent fuel pool whereas others require a specific temperature below boiling to me maintained. There should be a discussion of the different licensing bases –and application to licensee specific criteria “in accordance with the current licensing basis”- rather than only the standard’s safe and stable definition.

2. The discussion of safety, that is the adequacy of programmatic defense-in-depth features, lacks technical arguments of why full core off load is or is not a high risk evolution. To provide consistency in licensee evaluations of spent fuel cooling and make-up the NRC staff suggests that technical criteria (in addition to the programmatic defense-in-depth features) be added to provide the topics for consideration. For example for the key safety function of spent fuel cooling and make-up: feasibility of any operator actions, implications of high density racks, implications of possible dual unit core off load, consideration of time to boiling (if current licensing basis) or drain down to near top of fuel (if boiling is consistent with current licensing basis), discussion of capabilities to provide cooling outside of fuel building (assuming pinch points exist in the fuel building), and any degraded cooling or make-up capability described as part of the licensing bases.

3. If based on the technical discussion in item 2, industry stakeholders don’t consider a full core off load to be a high risk evolution, then the FAQ should state what conditions need to exist such that a full core offload would be a high risk evolution. If the NRC staff determines that a full core off load represents a high risk evolution, we can include our conclusion in a FAQ closure memorandum and prepare to include such discussion be included in a future regulatory guide.

4. The programmatic portion at the bottom of Page 10, beginning, “In addition. . .” is redundant to the information at the top of Page 10.

These comments will be included in ADAMS and attached to the meeting announcement.

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