



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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August 31, 2016

Mr. W. Anthony Nowinowski, Program Manager
PWR Owners Group, Program Management Office
Westinghouse Electric Company
1000 Westinghouse Drive, Suite 380
Cranberry Township, PA 16066

SUBJECT: STAFF AUDIT CONSIDERATIONS FOR REVISION 0 OF THE PRESSURIZED
WATER REACTOR OWNERS GROUP GENERIC SEVERE ACCIDENT
MANAGEMENT GUIDELINES

Dear Mr. Nowinowski:

The purpose of this letter is to provide U.S. Nuclear Regulatory Commission (NRC) staff audit considerations for the Pressurized Water Reactor Owners Group (PWROG)-15015-P, "PWROG Severe Accident Management Guidelines," dated February 26, 2016. PWROG-15015-P provides the pressurized water reactor generic severe accident management guidelines (SAMGs) that licensees have committed to implement on a site-specific basis. The audit of the SAMGs was discussed with the PWROG during an August 10 and 11, 2016, meeting (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16214A319). A second purpose of this letter is to request that long term access to PWROG-15015-P be provided to the NRC for training purposes through an electronic reading room.

The NRC staff's approach for the review of the PWROG generic SAMGs, which are not a requirement, is outlined in a letter to the Nuclear Energy Institute (NEI) dated February 23, 2016 (ADAMS Accession No. ML16032A029). As discussed in the February 23, 2016, letter, the NRC staff was directed by the Commission in an August 27, 2015, staff requirements memorandum (ADAMS Accession No. ML15239A767), to update the Reactor Oversight Process (ROP) to explicitly provide periodic oversight of industry's implementation of the SAMGs.

By letter dated October 26, 2015 (ADAMS Accession No. ML15335A442), the NEI informed the NRC of an industry initiative to maintain SAMGs. This letter stated that each licensee will send a letter to the NRC docketing its site-specific SAMG commitments by December 31, 2015. The NRC has received SAMG commitment letters from each licensee that are consistent with the commitments outlined in the NEI's October 26, 2015, letter. The licensees' SAMG commitment letters include commitments to update the site-specific SAMGs based on the PWROG generic SAMGs in a timely manner after the generic SAMGs have been published by the PWROG.

The February 23, 2016, letter informed the NEI that the NRC staff intends to update the ROP by December 31, 2020, to allow for oversight of the site-specific SAMG incorporation of generic guidance revisions. To support the ROP update this letter provides additional details regarding the audit of the generic SAMGs. Key considerations regarding the staff's audit include the following:

- As stated in the February 23, 2016, letter the staff is requesting access to the PWR generic SAMGs (i.e., PWROG-15015-P) through an electronic reading room to inform and develop the appropriate ROP updates and subsequent inspections of the site-specific implementation of the generic SAMGs.

The staff will not charge fees to the PWROG for the staff's audit of the PWR generic SAMGs because: 1) the PWROG is not requesting NRC staff review of the generic SAMGs, and 2) the PWROG is not formally submitting the documents to the NRC. The NRC staff's audit of the generic SAMGs will enable the staff to develop the inspection procedures necessary to support the inspection of the site-specific implementation of the generic SAMGs. The staff notes that operating reactor licensees will be subject to inspection fees in accordance with 10 CFR 170.21 for the inspection of site-specific implementation of the generic SAMGs.

- The milestones for the staff's audit of the PWR generic SAMGs are as follows:
 - September 2016 – the NRC identifies to the PWROG the NRC staff requesting access to the generic PWR SAMGs
 - September 2016 – the PWROG provides access to the generic PWR SAMGs through an electronic reading room
 - December 2016 – the NRC staff provides feedback on generic PWR SAMGs to the PWROG for their consideration
 - February 2017 – Meeting between the NRC and the PWROG to discuss disposition of the NRC feedback on the generic PWR SAMGs
 - May 2017 – the NRC documents results of the audit of the generic PWR SAMGs for purposes of informing development of ROP site-specific implementation of generic SAMGs
- As stated in the February 23, 2016, letter, another purpose for requesting access to the PWROG generic SAMGs is to develop familiarity with the guidelines to inform and train the NRC staff on other regulatory actions (e.g., research activities to model severe accident sequences, and training NRC staff members who are involved with incident response activities). Therefore, the NRC is requesting long-term access to the PWROG generic SAMGs for selected staff to support this purpose.

W. Anthony Nowinowski

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Jonathan Rowley, of my staff, will contact you in the near future to make arrangements for the NRC staff to gain access to the PWROG generic SAMGs. Should you have any questions please contact Jonathan at (301) 415-4053, or via email to Jonathan.Rowley@nrc.gov.

Sincerely,

/RA/

Louise Lund, Director
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

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Sincerely,

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Louise Lund, Director
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Office of Nuclear Reactor Regulation

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ADAMS Accession No.: ML16229A527

***-via email**

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DATE	08/18/2016	08/18/2016	08/22/2016	08/22/2016	08/26/2016
OFFICE	NRR/JLD/JHMB	NRR/DIRS/BC	NRR/DRA	OGC* (NLO)	NRR/DPR
NAME	GBowman*	CMRegan	RFelts for JGiitter	SClark	LLund
DATE	08/22/2016	08/23/2016	08/23/2016	08/29/2016	08/31/2016

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