



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 28, 2017

Ms. Lesa P. Hill, Chairman
Boiling Water Reactor Owners' Group
Southern Nuclear Operating Company
c/o GE Hitachi Nuclear Energy
P.O. Box 780
3901 Castle Hayne Road, M/C F-12
Wilmington, NC 28402

SUBJECT: STAFF AUDIT CONSIDERATIONS FOR REVISION 3 OF THE BOILING
WATER REACTOR OWNERS GROUP GENERIC SEVERE ACCIDENT
GUIDELINES

Dear Ms. Hill:

The purpose of this letter is to provide U.S. Nuclear Regulatory Commission (NRC) staff audit considerations for the Boiling Water Reactor Owners Group (BWROG) Revision 3 of the Emergency Procedure Guidelines and Severe Accident Guidelines (EPG/SAG Revision 3). The staff notes that the BWROG has combined EPGs, which are a requirement, with the SAGs which are not a requirement, in one document. The audit plan outlined in this letter is limited to the SAG portion of EPG/SAG Revision 3. EPG/SAG Revision 3 provides the BWR generic severe accident guidelines that licensees have committed to implement on a site-specific basis. The audit of the SAGs was discussed with the BWROG 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 BWROG EPG/SAG Revision 3 be provided to the NRC for training purposes through an electronic reading room.

The NRC staff's approach for the review of the BWROG generic SAGs, 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 SAGs.

By letter dated October 26, 2015 (ADAMS Accession No. ML15335A442), the NEI informed the NRC of an industry initiative to maintain SAGs. This letter stated that each licensee will send a letter to the NRC docketing its site-specific SAG commitments by December 31, 2015. The NRC has received SAG commitment letters from each licensee that are consistent with the commitments outlined in the NEI's October 26, 2015, letter. The licensees' SAG commitment

letters include commitments to update the site-specific SAGs based on the BWROG generic SAGs in a timely manner after the generic SAGs have been published by the BWROG.

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 SAG incorporation of generic guidance revisions. To support the ROP update, this letter provides additional details regarding the audit of the generic SAGs. Key considerations regarding the staff's audit include the following:

- The staff is requesting access to the BWR generic SAGs Revision 3 through an electronic reading room to inform and develop the appropriate ROP updates and subsequent inspections of the site-specific implementation of the generic SAGs.

The staff will not charge fees to the BWROG for the staff's audit of the BWR generic Revision 3 SAGs because: 1) the BWROG is not requesting NRC staff review of the generic Revision 3 SAGs, and 2) the BWROG is not formally submitting the documents to the NRC. The NRC staff's audit of the generic Revision 3 SAGs will enable the staff to develop the inspection procedures necessary to support the inspection of the site-specific implementation of the generic SAGs. The staff notes that operating reactor licensees will be subject to inspection fees in accordance with Title 10 of the *Code of Federal Regulations* 170.21 for the inspection of site-specific implementation of the generic SAGs.

- The milestones for the staff's audit of the BWR generic Revision 3 SAGs are as follows:
 - December 2016 – the NRC identifies to the BWROG the NRC staff requesting access to the generic BWR Revision 3 SAGs (Complete)
 - January 2017 – the BWROG provides access to the generic BWR Revision 3 SAGs through an electronic reading room (Complete)
 - May 2017 – the NRC staff provides feedback on generic BWR SAGs to the BWROG for their consideration
 - June 2017 – Meeting between the NRC and the BWROG to discuss disposition of the NRC feedback on the generic BWR SAGs
 - August 2017 – the NRC documents results of the audit of the generic BWR Revision 3 SAGs for purposes of informing development of ROP site-specific implementation of generic SAGs
- The staff is also requesting long-term access to the BWROG generic Revision 3 SAGs for selected staff. Long-term access is being requested to develop familiarity with the guidelines for the purpose of informing and training 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).

The staff notes that the BWROG may request a formal review of the EPG portion of the combined EPG/SAG document in the future. The staff further understands that this request may be forthcoming when EPG/SAG Revision 4 is targeted for issuance, which is in early calendar year 2018. We request that you inform us as soon as practicable if such a request will be made so that the staff can adequately plan for this activity.

Jason Drake, of my staff, will contact you in the near future to make arrangements for the NRC staff to gain access to the BWROG generic Revision 3 SAGs. Should you have any questions please contact Jason at (301) 415-8378 or via email to Jason.Drake@nrc.gov.

Sincerely,

/RA/

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

Project No. 691

SUBJECT: STAFF AUDIT CONSIDERATIONS FOR REVISION 3 OF THE BOILING WATER REACTOR OWNERS GROUP GENERIC SEVERE ACCIDENT GUIDELINES DATED FEBRUARY 28, 2017.

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ADAMS Accession No.: ML16293A162; *via email**NRR-106**

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