

Enclosure 1

M170023

Revised Response, GEH Proposed Resolution of Item #17

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NRC- Suggested Design Changes Item #17 – Emergency Operating Procedures

Update emergency procedure guidelines and severe accident management guidelines consistent with NEI 91-04.

GEH Revised Response:

In MFN-15-044 (June 19, 2015), GEH responded to Item #17 of the NRC suggested ABWR design changes collectively referred to as the “28-item backfit list.”¹ Subsequently, in M170020 (January 23, 2017), GEH modified a response to Item #26 of the backfit list to remove from the ABWR Design Control Document (DCD) certain information that related to post-Fukushima Recommendation 4.2, Mitigation Strategies, based on discussion with the NRC. During the processing of M170020, GEH identified information that had been added to the ABWR DCD for resolution of Item #17, but which related to the mitigation strategies.

For consistency with the changes in the response to Item #26, GEH proposes to remove from the ABWR DCD reference to the NEI guidance for mitigation strategies and the associated FLEX support guidelines which were added as guidance for developing emergency procedures. For the same reasons that were set forth in M170020 regarding a near-term pending final rulemaking to address mitigation of beyond design basis events (10 CFR 50.155), GEH has determined that the references to the FLEX guidance are no longer appropriate. The new rule will provide the appropriate actions for future licensees to address mitigating strategies and related procedure development.

Removing information in the ABWR DCD that was added for resolution of Item #17 does not result in any further changes to section of the DCD, other than those identified in the attached DCD markups.

The response that was presented in MFN-15-044 is revised as shown below, with the changes in red text:

GEH will amend ABWR DCD Tier 2, Sections 13.5.3.2 and 13.5.4 to reference NEI 91-04. In addition, NEI 06-12, NEI 14-01 and SECY-11-0124 have been added as references. The current revision of the ABWR DCD contains the Emergency Operating Procedures (EOPs) and the new references will provide guidance to the plant operator on the development of the additional post accident guidelines used by the industry:

- Severe Accident Management Guidelines (SAMGs),
- Extensive Damage Mitigation Guidelines (EDMGs),
- ~~FLEX Support Guidelines (FSGs)~~ and
- Plant Specific Technical Guidelines (PSTGs).

The following text will be added to the next revision of the ABWR DCD Tier 2,

¹ See Letter from USNRC to Jerald G. Head, GEH, Subject: GE-Hitachi Nuclear Energy, –United States Advanced Boiling-Water Reactor Design Certification Renewal Application, July 20, 2012 (ML12125A385).

Section 13.5.3.2:

The procedure development will integrate the Emergency Operating Procedures (EOPs), Severe Accident Management Guidelines (SAMGs), ~~FLEX Support Guidelines (FSGs)~~ and Extensive Damage Mitigation Guidelines (EDMGs) by using the following guidance:

- Industry (BWROG) guidance as endorsed by applicable NRC regulatory guides consistent with the Task Force recommendation as described in SECY-11-0124 (Reference 13.5-9).
- Plant Specific Technical Guidelines (PSTGs), EOPs and SAMGs development activities using as inputs the standard ABWR guidelines (DCD) and generic industry guidance per NEI 91-04, Revision 1, Severe Accident Issue Closure Guidelines (Reference 13.5-10), which includes the industry commitment to incorporate severe accident strategies into the overall accident management program.
- EDMGs development as described in NEI 06-12, Reference 13.5-11.
- ~~FSGs development as described in NEI 12-06, Reference 13.5-12.~~
- The EOPs, EDMGs, FSGs and SAMGs will be integrated in a cohesive, effective and useable manner as described in NEI 14-01, Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents (Reference 13.5-1243).

The four new documents referenced will be added to both Section 13.5.4 and to the appropriate Tables in Section 1.8 (Tables 1.8-21 and 1.8-22).

Impact on DCD:

The DCD Tier 2 Tables 1.8-21 and 1.8-22 (the previous change in Table 1.8-22 is not impacted by this revised response), and Sections 13.5.3.2 and 13.5.4, are being revised. The ABWR DCD R6 marked up pages are provided in Enclosure 2.