



NUCLEAR ENERGY INSTITUTE

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# Mitigation of Beyond Design Basis Events Flexible Scheduling

Template for Request to Use  
10 CFR 50.155 (h)(2) to Establish  
Alternative Date for Compliance with  
Reevaluated Seismic Hazard Mitigation  
Requirements of 10 CFR 50.155(b)(2)



# Key provisions of Final Draft 10 CFR 50.155, Mitigation of Beyond- Design-Basis Events

- (b)(2) Reevaluated Seismic and Flooding Hazards Mitigation
- (h)(1) Compliance Date Requirements
- (h)(2) Alternate Compliance Date for a Reevaluated Hazard



(b)(2) – Each licensee that received the March 12, 2012 NRC 50.54(f) Request for Information letter, shall consider the reevaluated hazards information

- For some licensees, the detailed Seismic Risk Evaluation required to respond to the 50.54(f) Request is currently in progress
- These Seismic Probabilistic Risk Analyses are progressing on a staggered schedule for completion and submittal by December 31, 2019



# Seismic Mitigation Strategy Assessments

- Methodology provided by NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Appendix H
- Appendix H, Path 5, methodology uses the inputs and risk insights developed in the Seismic Probabilistic Risk Assessments (SPRA)
- Seismic Mitigation Strategy Assessments will be completed and submitted for NRC review prior to implementing identified modifications and achieving compliance with (b)(2)



## (h)(1) – Implementation Dates

- 3 years from 10 CFR 50.155 effective date for Order EA-13-109 recipients
- 2 years from 10 CFR 50.155 effective date for all others



## (h)(2) - Alternate Compliance Date for a reevaluated hazard

- Request due no later than 90 days after effective date of 10 CFR 50.155
- Submitted Request regarded as approved 120 days after submission unless notified otherwise.



# Alternate Compliance Date Request

- Good Cause
  - Reason Alternate Date is Needed
    - Seismic Mitigation Strategies Assessment, Path 5 Option, uses risk insights and inputs from SPRA
    - Seismic Mitigation Strategies Assessment may identify plant modifications and/or FLEX Mitigation Strategy changes





# Alternate Compliance Date Request

- Good Cause, continued
  - Assurance of Safety During Alternate Compliance Date Period
    - Existing Orders and Strategies remain in place
    - Compliance with other 10 CFR 50.155 provisions
    - Good Faith effort to achieve requirements by Compliance Date
    - Expedited Seismic Evaluation Process including identified actions completed
    - Spent Fuel Pool Seismic Evaluation completed



# Summary

- Request to Use Flexible Schedule Provisions To Establish Alternate Compliance Date for Reevaluated Seismic Hazard template
  - Provides for consistent level of detail in request
  - Supports timely request submittal
  - Assures all considerations addressed
  - Standard format facilitates NRC Staff review

