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**Subject:** [External\_Sender] Summary table showing key attributes for eligibility criteria  
**Date:** Wednesday, April 21, 2021 12:57:13 PM  
**Attachments:** [ARPS Rule Eligibility Criteria Attribute Summary Table.docx](#)  
**Importance:** High

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Nan,

Good afternoon.

As discussed during the meeting this morning, the attached table shows our understanding of the key attributes associated with each of the eligibility criteria. I ask that your folks review the table and then let me know if we're aligned in our understanding or if adjustments are needed. Given my commitment to get you the guidance in time to support the near-term rulemaking schedule milestones, I request a timely review and return of staff feedback. Any method of providing the feedback is fine with me – telephone call, email or meeting.

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## ARPS Rule – Eligibility Criteria Attribute Summary Table

Attributes	Eligibility Criterion		
	§ 73.55(a)(7)(i)(A)	§ 73.55(a)(7)(i)(B)	§ 73.55(a)(7)(i)(C)
<b>Facility Possesses a Target Set</b> ( <i>see definition below</i> )?	No	Yes	Yes
<b>Facility Possesses an Achievable Target Set</b> ( <i>see definition below</i> )?	N/A	No	Yes
<b>Credit engineered safety and security features described in licensing basis?</b>	Yes	Yes	Yes
<b>Credit on-shift operator actions to prevent or mitigate consequences?</b>	No	Yes	Yes
<b>Credit post-facility recovery actions to prevent or mitigate consequences?</b>	No	No	Yes
<b>How is release timing and magnitude determined?</b>	Analysis assumes DBT attack starts at T=0 and determines subsequent SSC failures	Analysis assumes DBT attack starts at T=0 and determines subsequent SSC failures	Analysis assumes DBT attack starts at T=0 and determines subsequent SSC failures
<b>Credit physical and chemical processes that prevent or mitigate consequences?</b>	Yes	Yes	Yes

A “target set” is the minimum combination of equipment or operator actions which, if all are prevented from performing their intended safety function or prevented from being accomplished, would result in offsite doses greater than the reference values in §§ 50.34(a)(1)(ii)(D) and 52.79(a)(1)(vi).

An “achievable target set” means a target set that is within the ability of the DBT to compromise, destroy, or render nonfunctional, absent actions by an onsite armed response force.