

	Comment	Guidance should include relevant information without reliance on EPFAQs.	Page 2, Sect 1.2
		There is a wide range of what could be considered as "addressing" a serious event or condition. From an EP perspective, the capability to identify, classify, and notify could be considered as "addressing" the event.	Page 11, Sect 3.1.1(A)
		With 50.155, is this still true? Should this wording be updated?	Page 13, Sect 3.1.5(3)
		10 CFR 50 Appendix E, IV.C, specifically addresses when a declaration needs to be made. If any additional clarification is needed, it should be included in 99-01.	Page 24, Sect 5.1
	Comment	Should also go with site-specific procedures. It seems that you have a table that has "in accordance with plant procedures" surrounded by discussions that do not include plant procedures and do not refer to the table.	Page 27, Sect 5.6
	Comment	Should Short-Lived events be specifically identified in the applicable EALs?	Page 28, Sect 5.7
		The inadequate RCS heat removal threshold was removed from the PWR fission product barrier matrix. If the description is so complicated/unclear that it relies on an example, then maybe alternate wording should be provided	Page 28, Sect 5.8
	Comment	Is it possible to simply state that licensees should simply use 2 times the alarm values as calculated by ODCM/RETS methodology. Licensees spend effort making this harder on themselves than intended.	Page 31, EAL AU1
	Comment	EAL #3 is based on samples and/or surveys. Not sure what setpoint the setpoint/threshold statement refers to. However, this would be a really good statement for EALs #1 and #2.	Page 34, For EAL #3
		Concerning the sentence of the last paragraph on pages 43, 50, and 56: If you cannot get a reading in a timely manner, then why have the indication? If no reading is provided, then an alternate method to determine level 2 in a timely manner should be provided.	Page 43, For EAL #3 Page 50, AS2 Page 56, AG2

NRC PRESENTATION SLIDE
 NEI 99-01 DRAFT C
 Public Meeting, October 20, 2021

		If there is a potential delay in placing the instrumentation in service, it should be noted and the EAL should be declared, if applicable, promptly following receipt of level 2 values.	
		The final sentence of the first paragraph for EAL#2 addresses notification and not communication capability.	Page 69, CU5 Developer Note for EAL#2 Page 200, SU6 Developer Note for EAL#2
	Comment	Need to be careful with statements indicating that a condition does not warrant an EAL classification. You could uncover an irradiated fuel assembly during refueling which would require a declaration under AA2. Some would/could attempt to use this statement as justification for not declaring an event.	Page 72, EAL #2 discussion
		Although SAFETY SYSTEM, as used in the EAL threshold values, is a defined term, the term “required by Technical Specifications” was added to the threshold value. EALs CA6 and SA9 are based on the extent of a hazardous event. If a hazardous event results in degraded performance in one safety system, then that system was reasonably in operation and needed for the current plant conditions. This degraded performance in at least one train and either degraded performance in a second safety system or VISIBLE DAMAGE, as defined in the EAL technical basis document, would require an alert declaration. Although the above seems pretty straightforward, extensive wording was added to the basis discussion and developer notes that introduce such statements as “two-train impact criteria” and “severe enough to affect the functionality or reliability of two trains” which could cause unnecessary confusion and/or inconsistency.	Page 78, CA6 Page 215, SA9

NRC PRESENTATION SLIDE
 NEI 99-01 DRAFT C
 Public Meeting, October 20, 2021

		The R6 version of CS1 uses containment closure as a discriminator between threshold values 1 and 2. Threshold values 1 and 2 have similar RCS/RPV level indications. The proposed threshold values 1 and 2 vary both containment closure and RCS/RPV conditions. This change needs additional justification and/or clarification.	Page 82, CS1
		Similar changes were proposed for CS1 threshold value 2(b) and CG1 threshold value 1(a). As proposed, it appears that CS1 threshold value 2 and CG1 threshold value 1 will both be met at the same time.	Page 82, CS1 Page 89, CG1
		Similar changes were proposed for CS1 threshold value 2(b) and CG1 threshold value 1(a). As proposed, it appears that CS1 threshold value 1 and CG1 threshold values will be more focused on maintenance of core cooling than a loss of RCS/RPV inventory affecting core decay heat removal capabilities as identified in the initiating conditions for these EALs.	Page 82, CS1 Page 89, CG1
	Comment	I think I understand what this means. It means that you are taking actions to restore or maintain the identified safety functions and not that you are actually meeting acceptance criteria. Implicit in this decision is the expectation that you are taking actions that are expected to restore the safety function.	Page 87, CS7 Basis discussion
		The basis discussion for CG1 includes the term containment integrity instead of CONTAINMENT CLOSURE. In lower modes, CONTAINMENT CLOSURE may be more appropriate.	Page 91, CG1 Basis discussion, 4 th paragraph
	Comment	The fact that 300 µCi/gm DE I-131 is a typical value for 2% seems to get lost by some applicants (they include both a 2% value and a 300 µCi/gm DE I-131value). If a licensee just picked 2% based on their site-specific value that would be support improved timely and accurate EAL assessments. Pretty much, you could incorporate your proposed developer note information in the threshold value with a clear focus on 2%.	Page 108, RCS Activity Loss 1.A Page 111, Primary Containment Radiation Loss 4.A

NRC PRESENTATION SLIDE
 NEI 99-01 DRAFT C
 Public Meeting, October 20, 2021

		The second paragraph for RCS Activity Loss 1.A Developer Notes and the last sentence of the Developer Notes for Containment Radiation Loss 4.A both indicate that a licensee can use either 2% clad damage or 300 $\mu\text{Ci/gm}$ DE I-131 value for threshold values. Specifying 2% would provide better timeliness and accuracy.	Page 108, RCS Activity Loss 1.A Developer Note Page 112, Containment Radiation Loss 4.A Developer Note
		What is the definition of an accident situation? Would you be in an emergency operating procedure if you did not have an accident situation?	Page 123, Loss 3.B second paragraph
	Comment	PWR Fission Product Barrier Matrix has similar 2% and 300 $\mu\text{Ci/gm}$ DE I-131 comments as the BWR Matrix.	Pages 135 and 136
	Comment	The Westinghouse Owners Group Emergency Response Guidelines provide a more apparent specific condition (Heat Sink Red Path) than that provided for Combustion Engineering designs.	Page 141, Developer Notes for RCS Barrier Potential Loss 2.A
	Comment	The developers note includes a specific reference to 2-loop Westinghouse plant that could be taken to imply that 3 or 4 loop Westinghouse plants would not have to make this declaration if plant conditions required the steaming of a leaking or ruptured S/G.	Page 146 Developers Note for Loss 1.A
	Comment	EAL HU2 Developer Notes seem to encourage selecting one of two provided alternatives. Could consider suggesting a primary and alternative method that is consistent with guidance.	Page 162

NRC PRESENTATION SLIDE
 NEI 99-01 DRAFT C
 Public Meeting, October 20, 2021

		The Initiating Condition for SU3 is reactor coolant activity greater than Technical Specification allowable limits. Considering that this condition would be addressed by site-specific procedures consistent with any other plant condition that did not meet applicable Technical Specifications, the underlying basis for SU3 is not explicitly stated. The proposed guidance for EAL #2 appears to require an EAL declaration when site-specific procedures and Technical Specifications may not indicate the need for a power reduction. If Technical Specifications did require a reactor shutdown, the reactor would be placed in a lower mode as directed by Technical Specifications. Considering that the site would continue to meet its Technical Specifications Limiting Conditions for Operation, it is not clear what threshold would represent the threshold value for a Notification of Unusual Event.	Page 93, SU3
		Similar to SU3, the proposed RCS leakage threshold values could result in a Notification of Unusual Event when site-specific procedures, including the Technical Specifications, would direct placing the reactor in a lower mode of operation by performing a controlled shutdown if required.	Page 194, SU4
		Should stay consistent with CA6, SA9 use of "required by Technical Specifications" discussed earlier.	Page 209, SU9
		I understand that this should not be needed. However, the power supply to the site-specific emergency bus must be capable of powering the safety systems. If you have multiple power sources available to an emergency bus that, for whatever reason, cannot supply AC power to SAFETY SYSTEMS, then SA1 should not credit those sources.	Page 204, SA1 EAL Threshold Value (1)b
	Comment	Many sites consider control as being transferred when the operators are capable of implementing procedures to restore or maintain control while some seem consider control as actual restoration. Should be clear as to which one is expected.	Page 211, SA5 Page 222, SS5

NRC PRESENTATION SLIDE
 NEI 99-01 DRAFT C
 Public Meeting, October 20, 2021

		<p>This should be more along the lines of the SM/ED has determined that safety functions cannot be restored/maintained using emergency procedures. Waiting for 1200 degrees during an extended loss of AC is not appropriate as this would wait until GE criteria under Fission Product Barrier criteria is met. Note: The Developer Notes (last sentence of the first paragraph) does provide reasonable wording for threshold value development. Note: the NRC staff does recognize that the current EAL scheme (revision 6) does include both coping times OR site-specific indication of an inability to adequately remove heat from the core. However, for an extended loss of all AC power, site-specific indication of an inability to remove heat from the core that is functionally identical to the fission product barrier matrix, does not provide additional time for implementation of offsite protective actions.</p>	<p>Page 226, SG1 Threshold Value (1)b</p>
	<p>Comment</p>	<p>In addition to indicating that a “site-specific bus voltage value” the current SG8 developer notes include a statement describing typical cell voltage. Is this really needed?</p>	<p>Page 230, SG8 Developer Notes</p>
	<p>Comment</p>	<p>The definition of UNISOLABLE includes a Developer Note that is very wordy and not as clear as the definition. If there is a specific need for this Developer Note, it may be a good idea to get a cold read to ensure it meets the intended purpose.</p>	<p>Page B-4</p>
		<p>Basis for EAL AA1 #3 includes reference to “all hazards response plans.” Are all State and local public safety and environmental officials required to have an all hazards response plan that is capable of taking action for a radioactive spill?</p>	<p>C-1, Change Summary/Basis</p>