



**SOUTHERN NUCLEAR**

# Industry Perspective on LBLOCA Rule Change (10 CFR 50.46a)

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# Industry Support

- **Improves focus on safety**
- **Key step toward a consistent, risk-informed, performance-based regulatory structure**
- **Provides greater operational flexibility**

# Safety Benefit Examples

- **Extend Emergency Diesel Generator Start Time to increase Reliability**
- **Enable improved GSI-191 Water Management strategies, e.g.**
  - Eliminate unnecessary containment spray actuation
  - Increase operator time to perform sump switch-over actions
- **Optimize ECCS flow balancing for SBLOCA**

# Operational Benefit Examples

- **Greater flexibility in operational parameters**
  - Accumulator operability requirements
  - Lower RWST boron concentration
  - Containment Fan Cooler requirements
  - Ultimate Heat Sink requirements
  - Lower peak containment pressure in analyses
- **Improvements in operational efficiency**
  - Fuel utilization
  - Core design

# Key Issues and Provisions

- **Selection of Transition Break Size**
  - Substantial conservatism beyond Expert Elicitation results
  - However, Minimal BWR benefits
  - With existing TBS, expect few BWRs to adopt
- **Mandated OOS time not risk-informed**
- **Change Management Process**
  - Once adopted by a plant, all subsequent changes undergo a risk-informed review
- **Maintains Defense in Depth**
  - Rule provisions, in concert with existing regulations and regulatory processes, provide assurance that defense in depth will be maintained

# Next Steps

- **Awaiting transmittal of rule package to Commission for decision**
- **Industry, through NEI and Owners Groups, will work with NRC staff to develop implementation guidance**
- **Pilot applications await final rule and implementation guidance**