

**NOTATION VOTE**

**RESPONSE SHEET**

**TO:** Annette Vietti-Cook, Secretary

**FROM:** Gregory B. Jaczko

**SUBJECT:** SECY-11-0014 – USE OF CONTAINMENT ACCIDENT  
PRESSURE IN ANALYZING EMERGENCY CORE  
COOLING SYSTEM AND CONTAINMENT HEAT  
REMOVAL SYSTEM PUMP PERFORMANCE IN  
POSTULATED ACCIDENTS

Approved \_\_\_\_\_ Disapproved  X  Abstain \_\_\_\_\_

Not Participating \_\_\_\_\_

COMMENTS: Below \_\_\_ Attached  X  None \_\_\_

  
\_\_\_\_\_  
SIGNATURE

2/18/11  
\_\_\_\_\_  
DATE

Entered on "STARS" Yes  x  No \_\_\_

**Chairman Jaczko's Comments on SECY-11-0014,  
"Use Of Containment Accident Pressure In Analyzing Emergency Core Cooling System  
And Containment Heat Removal System Pump Performance In Postulated Accidents"**

I disapprove the staff approach to credit containment accident pressure (CAP) in the analyses of emergency core cooling systems. I am, however, comfortable with the approach recommended by the Advisory Committee on Reactor Safeguards in their May 19, 2010 letter. I appreciate the many discussions that have occurred between the staff and the ACRS, but I believe at this point there is not a sufficient safety basis to allow CAP to be credited in ongoing license amendments and other licensing actions. As the ACRS reiterates in their February 17, 2011 letter to the Commission, "crediting containment accident pressure is a serious compromise of the independence of the prevention and mitigation functions, a basic element of the defense-in-depth philosophy." In particular, I am very supportive of the ACRS approach to allow licensees to justify the use of CAP credit with plant specific risk information that demonstrates the risk of relying on CAP is small. As ACRS indicates, this analysis should utilize risk analyses that include internal, fire, and seismic initiating events and consider the effect of operator errors.



Gregory B. Jaczko

2/18/11  
Date