

Proposed Rulemaking: Mitigation of Beyond Design Basis Events

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Importance of this Rule

- Centerpiece of the response to Fukushima
 - Establishes a regulatory framework for beyond design basis events
 - Integrates mitigating strategies with reevaluated hazards
 - Differentiates the treatment from design basis requirements
 - Improves the safety margin at every plant

Keep It Simple

- Provide diverse means to obtain power and water to perform key safety functions
- Risk-informed, performance-based approach
 - Absolutely necessary because sites, designs and hazards are different
- Need widespread understanding
 - Maintain clear differentiation between design basis and beyond design basis treatment

Implementation Dates

- Industry has met commitments on initial orders and requests for information thus far
- Rule must accommodate a spectrum of scenarios, methods and results
- Provide ample time based on realistic assumptions for completion of activities
- Minimize the need to seek exemptions for extensions of the deadline

Severe Accident Management Guidelines

- Industry initiative approved in 1994
- No significant issues identified in 2011 NRC inspections
- Relevant quantitative factors are insufficient to impose the requirement
- Docketed commitments provide appropriate regulatory footprint

New Plant Design Requirement

- Imposes new design basis requirements
 - Hazards are not beyond design basis for new plants
 - Complicates/confuses intent of proposed rule
- Fundamentally different from aircraft impact
- Unknown risk reduction benefit

Conclusions

- The timing is right for this rulemaking
 - We all know a lot more now
 - We have a better understanding of what's needed to complete the response
- While challenging, the rule provides the right framework for resolution of remaining issues