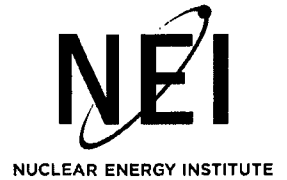


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6/11/2013  
78 FR 35072

(1)

July 10, 2013

Ms. Cindy K. Bladey  
Chief, Rules, Announcements, and Directives Branch (RADB)  
Office of Administration  
Mail Stop: TWB-05-B01M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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**Subject:** Comments on Proposed Revision to Strategies and Guidance to Address Loss of Large Areas of the Plant Due to Explosions and Fire; Docket ID NRC-2013-0124

**Project Number: 689**

Dear Ms. Bladey:

On behalf of the nuclear industry, the Nuclear Energy Institute (NEI)<sup>1</sup> appreciates the opportunity to comment on the Commission's proposed Revision 0 to NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," Section 19.4, "Strategies and Guidance to Address Loss of Large Areas of the Plant Due to Explosions and Fires." This was issued for public comment in *Federal Register* Notice 78 FR 35072.

The industry expresses its overall support for the proposed revision, which generally aligns well with the Interim Staff Guidance ISG-016 previously issued that provided guidance for implementing the requirements in 10 CFR 50.54(hh)(2).

Clarifying comments from industry stakeholders are consolidated in the attachment. Each comment has a reference to the relevant page number, section and paragraph.

<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

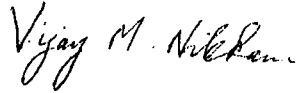
Ms. Cindy K. Bladey

July 10, 2013

Page 2

Please contact me if you have any further questions.

Thank you,

A handwritten signature in black ink that reads "Vijay M. Nilekani". The signature is written in a cursive style with a large initial 'V'.

Vijay M. Nilekani

Attachment

## Industry Comment Sheet(s) on Standard Review Plan NUREG-0800, Section 19.4

## Loss of Large Areas of the Plant due to Explosions and Fires

NEI Comments July 10, 2013

Comment #	Reference of Page, Paragraph, Sentence	Specific Comment	General/Notes
1	Pg. 19.4-3 Acceptance Criteria	In the discussion of review against 50.54(hh)(2) there is no reference to Interim Staff Guidance ISG 016 being superseded by SRP, Section 19.4 once it is issued.	The ISG is an interim guidance which should be replaced by the SRP 19.4 once it is issued.
2	Pg. 19.4-4 Staff Position	All the emphasis seems to be on Phase 1 and following the Feb. 25, 2005 guidance whereas most of the detail in the Mitigating Strategies Document (MSD) template (App. D to NEI 06-12, Rev.3) deals with Phase 2 and Phase 3.	There should be less emphasis on Phase 1 for the COL phase and more emphasis for descriptions of Phase 2 & 3 strategies which make up most of App. D.
3	Pg. 19.4-5 Proposed License Condition	<p>NRC proposed License Condition: "...incorporated in the standard license conditions in Chapter 13 of the FSAR...."</p> <p>License conditions are in Part 10 of a COL Application, not in the FSAR (Part 2). Table 13.4-201 in FSAR Chapter 13 references license conditions for some programs, which are actually in Part 10 of the COLA.</p>	<p>ISG-015 provides multiple avenues for implementation of Post COL actions or commitments. The SRP does not need to be prescriptive on how this is implemented.</p> <p>Commitments vs License Condition may provide a more detailed schedule implementation as program aspects may be required at different dates. i.e., 6 months prior to fuel load for programmatic and</p>

Comment #	Reference of Page, Paragraph, Sentence	Specific Comment	General/Notes
			<p>procedure elements and prior to fuel load for training elements.</p>
4	Pg. 19.4-6 Item 3. Airlifted Resources	The criteria establishes a two hour response and MOU or discussion of the agreement to provide such resources.	<p>Resources may or may not be available or may be controlled by other authorities (state or Federal) and therefore, no written or verbal agreement would be provided in some cases.</p> <p>The original NRC inspection wording is conditional that the "licensees were expected to look for airlifted resources using a 2-hour total response criteria" The wording should reflect that airlifted resources should be assessed not that airlifted resources are required.</p>
5	General Comment with reference to Comment # 4 above	As the NRC states in the footnote on 19.4-1: "The SRP is not a substitute for the NRC's regulations, and compliance with it is not required."	<p>As a beyond design basis accident the stated goal is to provide flexibility of response to meet the regulation, care should be taken to ensure the SRP does not reflect an overly prescriptive response. (e.g. see Item 3 above)</p> <p>The wording in the SER for operating plants is almost identical to the wording in this revision to the SRP with one notable exception.</p>

Comment #	Reference of Page, Paragraph, Sentence	Specific Comment	General/Notes
			Where the SER included the "It is the staffs expectation to evaluate..." , the SRP removes the conditional wording and states as a requirement. Care should be taken to ensure SRP is not overly prescriptive.
6	Pg. 19.4-9 Mass Casualties and Triage Areas	These two Phase 1 items are one item in the Mitigating Strategies Table (MST) that is part of the MSD described in App. D of NEI 06-12.	If 19.4 is going to continue to emphasize more detail on Phase 1 items than is intended by App. D, then SRP 19.4 must give some guidance on just how much detail is needed in the MST/MSD. The current MSD's do not have a lot of detail in the MST on these Phase 1 items.
7	Page 19.4-10, SRP Acceptance Criteria # 15. "Use of Plant Equipment During Loss of Power Situations", "...procedures to start an emergency diesel generator without direct current (dc) power,...."	Some diesel generator designs do not allow this and alternatives proposed by licensees have to be reviewed and accepted when demonstrated to achieve the intent of the strategies.  Passive reactor designs have diesel generators but not safety related "emergency" generators. Wording should be added to clarify this aspect.	Per the implementation guidance on Pg. 19.4 – 15 applicant may purpose an acceptable alternative for complying with the strategies being discussed in NEI Guideline NEI 06-12.
8	Pg. 19.4-11 SFP	Most of what is in this guidance is just what was	

Comment #	Reference of Page, Paragraph, Sentence	Specific Comment	General/Notes
	Mitigative Measures	<p>issued as Phase 1 guidance. There was significantly more guidance issued as part of Phase 2 and that should be presented in SRP 19.4 so that varying approaches to maintaining SFP cooling can be presented for evaluation.</p> <p>For example, AP1000 was approved using water spray cooling but COL Applicants also had to make a commitment related to air cooling.</p> <p>Language in the 3<sup>rd</sup> and 4<sup>th</sup> paragraphs of section 17 are related to air cooling and applicability should be clarified.</p>	
9	Pg 19.4-12, Item 20	Typo: "This item in not applicable" should be "This item is not applicable".	
10	Pg. 19.4-14 Evaluation Findings 1. New Reactor Applications	The statement is made "The NRC staff concludes that the program and associated implementation milestone(s) are included within the license condition on operational programs and implementation."	This statement is not accurate. The LOLA program is not an operational program that falls within the license conditions or the FSAR Table 13.4-201. It is a program that is beyond design basis and has a separate license condition for it's implementation and milestones. There are several other programs that fall outside Table 13.4-201

Comment #	Reference of Page, Paragraph, Sentence	Specific Comment	General/Notes
			and they are listed separately to distinguish them from the formal operational programs.
11	Appendix A, Page 19.4-18 through 24	PWR Owners Group recommendations	The PWROG document should be listed as a reference on Page 19.4-15. Would this be part of the evaluation criteria and included in the SER?