

## Process Overview for Implementation of Order EA-12-049

### Summary:

The NRC ensures U.S. nuclear power plants efficiently and effectively implement the Mitigating Strategies order by evaluating integrated plans, conducting onsite audits, and completing onsite inspections once compliance is achieved.

### Background:

- NRC Order EA-12-049 (ADAMS Accession No. [ML12054A735](#)) requires U.S. nuclear power plants to implement strategies to keep the core and spent fuel pool cool, as well as to protect the reactor's containment, following an extreme external event.
- The industry issued NEI-12-06 (ADAMS Accession No. [ML12242A378](#)) as guidance to comply with the Order; NRC endorsed the guidance in JLD-ISG-2012-01 (ADAMS Accession No. [ML12229A174](#)).
- The NRC issued Temporary Instruction 2515/191 (ADAMS Accession No. [ML14273A444](#)) to cover post-compliance inspections.
- All plants submitted overall integrated plans (OIPs) to describe how they would comply with the Order:
  - The NRC staff reviewed the OIPs and issued interim staff evaluations (ISEs), identifying either compliance or additional information needed to address the Order.
  - The NRC staff also audited both plant documentation and onsite activities to review the closeout of items identified in the ISEs to ensure full implementation no later than two refueling cycles after submittal of the OIPs or by December 31, 2016, whichever comes first.
  - The NRC has modified implementation schedules if sufficient justification is provided, such as in cases where licensees must synchronize mitigating strategies with the installation of severe accident capable hardened vents, as required by Order EA-13-109.

### Process Overview:

- Plants provided a mitigation strategies OIPs for NRC review:
  - OIPs should be updated every 6 months.
- NRC staff evaluated the OIP and issued an ISE:
  - NRC staff asked additional questions and performed regulatory audits per [LIC-111](#).
  - NRC staff updates the ISE as needed using audit notes.
- Plants will incorporate ISE information into a final implementation plan (FIP):
  - The NRC staff will review the FIP, guided by the ISE (and updated ISEs as appropriate).
  - The NRC staff will issue a final safety evaluation report on the FIP.
- The NRC will inspect compliance with the Order using [Temporary Instruction 2515/191](#).

### References:

Additional information about actions to comply with Order EA-12-049 can be found on the "[Implementation Status](#)" page under the Japan Lessons Learned section of the NRC public Web site.