



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, DC 20555 - 0001**

February 17, 2011

The Honorable Gregory B. Jaczko  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**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"**

Dear Chairman Jaczko:

In a June 25, 2010, Staff Requirements Memorandum, the Commission directed the staff to discuss where the staff aligns with the ACRS and disagrees with the ACRS regarding containment accident pressure (CAP) credit, including use of risk information, defense-in-depth implications, and need to assess the practicality of hardware changes to eliminate the need for CAP credit. During our 580<sup>th</sup> meeting, February 10-12, 2011, the staff presented an overview of their document on CAP credit, SECY-11-0014.

We continue to support the recommendations and positions described in our May 19, 2010 letter report.

The disagreement between our position and that of the staff appears to have increased. The staff continues to disagree with our position that 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. They continue to argue that there is no regulatory basis to request that licensees provide plant-specific risk information to help assess the challenge to defense in depth and support crediting CAP.

Regulatory Guide 1.82 has always included a position that CAP credit should be granted only if the design cannot be practicably altered to eliminate the need for credit. The staff intends

to remove this regulatory position, since, in their view, they do not have the regulatory authority to require licensees to evaluate whether requirements can be met in a particular way. Thus, they conclude that an analysis showing that the calculated containment accident pressure provides adequate net positive suction head is as acceptable as a design change that eliminates the need for CAP credit. We disagree.

Sincerely,

*/RA/*

Said Abdel-Khalik  
Chairman

**References:**

1. NRC Letter; Subject: "Draft Guidance on Containment Accident Pressure in Meeting the Net Positive Suction Head Required to Demonstrate that Safety Systems Can Mitigate Accidents as Designed," dated May 19, 2010 (ML1013003320)
2. SECY-11-0014, "Use of Containment Accident Pressure in Analyzing Emergency Core Cooling System and Containment Heat Removal System Pump Performance in Postulated Accidents," dated January 31, 2011 (ML102590196)
3. Enclosure 1 to SECY-11-0014, Staff Guidance, "The Use of Containment Accident Pressure in Reactor Safety Analysis," dated January 31, 2011 (ML102110167)
4. Enclosure 2 to SECY-11-0014, "Areas of Agreement and Disagreement between the NRC Staff and the Advisory Committee on Reactor Safeguards (ACRS), dated January 31, 2011 (ML102780592)
5. ACRS Memorandum, "ACRS Members Concerns Regarding Containment Overpressure (COP) Credit for Browns Ferry Extended Power Uprate," dated November 10, 2008 (ML082971024)

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Letter to The Honorable Gregory B. Jaczko from Said Abdel-Khalik, ACRS Chairman, dated February 17, 2011

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