



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

March 18, 2004

Dr. William D. Travers  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

SUBJECT: DRAFT FINAL REVISION 3 TO REGULATORY GUIDE 1.82, "WATER SOURCES FOR LONG-TERM RECIRCULATION COOLING FOLLOWING A LOSS-OF-COOLANT ACCIDENT"

Dear Dr. Travers:

Thank you for your letter of December 22, 2003, regarding the staff's response to our September 30, 2003 letter to Chairman Diaz concerning Draft Final Revision 3 to Regulatory Guide (RG) 1.82, "Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident." We have reviewed your response and would like to meet with you or your representatives to discuss a number of issues:

- The extent of the technical challenges faced by both the industry and the NRC
- The limitations of the present knowledge base, and plans to address these limitations
- The maturity of the technical content of the RG
- The technical basis for the RG, including particularly the role of the knowledge base described in NUREG/CR-6808, "Knowledge Base for the Effect of Debris on Pressurized Water Reactor Emergency Core Cooling Sump Performance"
- The adequacy of the guidance that the Nuclear Energy Institute (NEI) provided in the draft guidance document that is currently under review by the NRC staff
- The extent to which the staff should use risk information in resolving the issue of water sources for long-term recirculation cooling following a loss-of-coolant accident
- The possible need for alternative solutions to the issue of sump strainer clogging, should the uncertainties associated with the calculational methodology be large, or the strainers prove to be unduly susceptible to debris blockage

- The staff's specific plans to resolve the technical issues associated with Generic Safety Issue 191 - "Assessment of Debris Accumulation of PWR Sump Pump Performance"

Sincerely,

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Mario V. Bonaca  
Chairman

References:

1. U.S. Nuclear Regulatory Commission, Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident, Draft Regulatory Guide 1.82, Revision 3, August 2003.
2. Rao, D.V., et al., Knowledge Base for the Effect of Debris on Pressurized Water Reactor Emergency Core Cooling Sump Performance, NUREG/CR-6808, LA-UR-03-880, Los Alamos National Laboratory, February 2003.