

Generation of Risk Insights for Selected ISGs Steering Committee Comments

Risk Informed Task Work Group Meeting

February 8, 2008



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Generation of Risk Insights for Selected ISGs

- Steering Committee Comments from 2/1/08
 - Not sure what the industry is proposing.
 - Cannot change policy at this time.
 - Appears that we may be reducing defense-in-depth.
 - Is this where we want to spend our limited resources?

Generation of Risk Insights for Selected ISGs

- The industry is evaluating the risk implications of ISGs that are amenable to evaluation with PRA
 - This is one of the purposes of PRA per the PRA Policy Statement, Generic Letter 89-10, Regulatory Guide 1.174, etc.
- D3 Problem Statement #2 - Need for an independent and automated DAS where there is limited time for operator action.
- HFE Problem Statement #4 – Ability of the operator to recognize the need to use backup instrumentation in the presence of a digital CCF.
- Others as needed.

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- One of the industry's evaluations points out the need for a change in Commission Policy
 - Per the request of NRC management at the 5/07 Risk-Informed TWG meeting
 - If it is not possible to change NRC policy in the short term
 - Can implement the risk insights generated thus far without a policy change
 - Will request that the change be made as a part of SRP update

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- The industry's proposal does not reduce defense-in-depth
 - ISGs are not regulation
 - BTP-19 has provisions for allowing what the industry is proposing
 - More defense-in-depth is being provided for Large LOCA than BTP-19 requires for much more frequent transients

Generation of Risk Insights for Selected ISGs

- Resource requirements for generating insights regarding the benefits & risks of automated diverse actuation systems
 - The analysis is essentially complete (report in progress, expect to submit in March)
 - 10 plants participated by providing selected input from their PRAs (there is no need for an additional pilot)
 - The evaluation meets the principles of risk-informed regulation
 - Request the NRC staff
 - review and provide technical comments on
 - Bases for inputs to the analysis
 - Conclusions
 - Draft an ISG implementing the risk insights