Digital I&C Industry Perspective

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Topics

- Objectives
- Progress To-Date
- Remaining Effort
- Continuing Concerns
- Requested Activities



Objectives

 Develop a digital licensing process that is stable, predictable, and timely

 Provide guidance for the licensing process that is understandable and useable

 Facilitate application of digital technology that enhances plant safety, availability, and reliability



Progress To-Date

- Successful project plan implemented
 - Problem statements
 - Milestones
 - Deliverables
- Interim Staff Guidance (ISG) status
 - Four ISGs are finalized
 - Cyber security
 - PRA
 - Communications
 - Human Factors



Progress To-Date

- One ISG being revised
 - Diversity and Defense in Depth (May09)
- Two ISGs are in development
 - Licensing process
 - Fuel cycle facilities
- Issues identified beyond Project scope
 - Project scope limited to creating ISGs
 - NRC & Industry resolving issues together



Remaining Effort

Complete DI&C-ISG-06 Licensing Process

- Important work beyond Project scope:
 - Address operational issues
 - Define adequate diversity
 - Research PRA modeling
 - Incorporate operational experience



Continuing Concerns

- Licensing process is burdensome and is a disincentive for licensee submittals
 - Scope/detail of NRC review
 - Detailed design review versus
 - Reasonable assurance of regulatory compliance
 - Extent of document submittals
 - Those necessary for Staff development of a Safety Evaluation Report (SER) versus
 - Those available for audit/inspection
 - Credit for existing Appendix B Programs
- Crucial that basis be on a finding of reasonable assurance



Requested Activities

- Refine current digital licensing process through
 - Resolution of remaining issues
 - Applying lead projects lessons learned
 - Processing additional LARs
- Change existing deterministic Commission Policy on diversity and defense-in-depth
 - Policy established in SRM to SECY 93-087
 - Requires use of best estimate methods in analyzing defense against common-mode failure
 - Silent on use of risk informed decision making
 - Policy change necessary fully enable the licensing of DI&C designs by allowing risk informed methods



Requested Activities

- Complete permanent regulatory guidance this year
- Maintain Steering Committee through FY 2010
- Identify additional pilot plants
- Complete research (EPRI MOU)
- Commission briefing by the end of 2009

