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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Rulemakings and Adjudications Staff

OFFICE
OF
ADJUDICATION

Dear Sir/Ma'am:

I am providing the following comments upon the Advance notice of proposed rulemaking, "Risk-Informing Special Treatment Requirements," which was published in the March 3, 2000, Federal Register.

1. It is possible for the importance of plant equipment to change as a plant updates any living PRA. Changes in equipment availability (and in the definition used for availability), changes and refinements in system models, changes and refinements in plant procedures and associated human reliability analyses, and plant modifications can all result in changes in the relative risk rankings of plant systems and components within the plant PRA model.

Conceivably, such changes could result in shifting equipment from a Low Safety Significant category to a High Safety Significant category, or vice versa.

How would the NRC propose to treat equipment which had been originally considered Low Safety Significant (RISK-3 or Out of Scope per Figure 1) but which has evolved to be a High Safety Significant piece of equipment? What requirements would exist for utilities for equipment or systems which move from one category to the other, such that there is a change in the regulatory requirements to be applied to that equipment?

Such questions should be addressed and clear requirements established within the rulemaking process.

2. In addressing PRA quality and completeness concerns (Item C.4), it is very important to ensure that there is no bias introduced when comparing quantified Core Damage Frequencies (or other figures of merit) between risk calculations for individual plants. Because there is a significantly higher degree of conservatism and of uncertainty in any plant Fire or Seismic PRA compared to an Internal Events Level 1 PRA, true risk insights from the Internal Events Level 1 PRA are overwhelmed or masked if the various CDF's are merely added together or are assumed to be equivalent. Thus, it is important to treat Fire and Seismic risk evaluations separately from the higher confidence and higher pedigree Internal Events evaluations. In fact, due to the extremely large uncertainties in fire modelling associated with fire risk evaluations, such evaluations are better treated on a deterministic basis rather than through PRA techniques, although PRA techniques can be generically applied to ensure that a reasonable and risk-informed deterministic basis exists.

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3. Additionally in addressing PRA quality and completeness concerns (Item C.4), it needs to be recognized that the risk profiles associated with any plant outage is highly dependent on the schedule and activities conducted in the individual outage. The level of conservatism and uncertainty in a shutdown PRA model can be similar to that in an at-power PRA. However, attempts to determine importance measures are only as valid as the assumption of a generic outage schedule. Thus, a shutdown PRA remains a very valuable tool, for those plants that have it, for outage risk management, but the results of the PRA can and will vary from outage to outage dependent on workscope.

A handwritten signature in black ink, appearing to read "Paul Sicard". The signature is fluid and cursive, with a large initial "P" and "S".

Paul Sicard
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