

RIP50, Option 3 Public Workshop

“Issues Associated with Option 2/3 Interface”

C.R. Grantom P.E.

South Texas Project N.O.C.

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PURPOSE

- To identify possible interface alternatives between Option 2 and Option 3 efforts

DESIRED OUTCOME

- For workshop participants to be aware of how Option 2 (i.e., scope of 10CFR50) can impact and influence Option 3 efforts relative to regulated scope of SSCs
- To prompt NRC guidance to the industry on which alternative approach is recommended

DISCUSSION

- Per SECY 99-264, the staff indicates that its Phase 1 work will build upon and be consistent with SECY 99-256 (SECY 98-300, Option 2 work)
- Per SECY 99-264, risk informing Part 50 is closely related to the staff's work to make changes to the overall scope of SSCs covered the Part 50 special treatment requirements. Staff indicates this is an important first step.

DISCUSSION

- Stakeholder point-of-view: Establishing the scope of a risk informed Part 50 is crucial input for efficient Option 3 activities
- Important for stakeholder buy-in
- Important for proper development of Option 3 strategies

DISCUSSION

- Per SECY 99-256, Appendix T will categorize SSCs into the following:
 - RISC1, Safety Significant, Safety Related
 - RISC2, Safety Significant, Non-Safety Related
 - RISC3, Not Safety Significant, Safety Related
 - RISC4, Not Safety Significant, Non-Safety Related
- STPNOC experience shows the vast majority of safety related components reside in RISC-3

QUESTIONS

- Do RISC-3 SSCs stay within the scope of regulatory processes?
- If so, then what processes are applicable to RISC-3 SSCs?
- If not, then what regulatory mechanism will be used to exempt RISC-3 SSCs from 10CFR50?

POSSIBLE APPROACHES

- Alternative 1 - Only safety significant SSCs (assuming only two significance categories are used) are within the scope of 10CFR50 per Option 2 processes
- Alternative 2 -Both Safety Significant and Not Safety Significant, Safety Related SSCs are within the scope of 10CFR50 per Option 2 processes and specific exemptions are issued

POSSIBLE APPROACHES

- Alternative 1
 - Only safety significant SSCs proceed to Option 3 processes; all other SSCs are explicitly excluded from 10CFR50 scope.
 - Revises 10CFR50 scope prior to risk informing individual regulations per Option 3
 - Prevents applying deterministic strategies for safety related SSCs which have little or no safety significance

POSSIBLE APPROACHES

- Alternative 2
 - All Safety related SSCs, whether safety or not safety significant, proceed to Option 3 processes unless specific exemptions are issued.
 - No revision in 10CFR50 scope prior to risk informing individual regulations per Option 3
 - Potential exists for requiring risk informed strategies for safety related SSCs with very little or no safety significance

CONCLUSIONS

- Either alternative will work, but alternative 1 is more effective and efficient
- Alternative 1 removes not safety significant SSCs from 10CFR50 scope. Option 3 efforts are then performed on a reduced scope of SSCs
- Alternative 2 retains safety related SSCs within 10CFR50 scope and, therefore must contain documented and unambiguous allowances to exempt not safety significant SSCs from regulations within the scope of Option 3

CONCLUSIONS

- Currently, it is not clear which alternative the staff is working towards. Option 2 was originally intended to be a risk informed approach to determine safety significant SSCs
- Appendix T discusses Reliability Programs for RISC-3 SSCs. It is unclear as to what this means in regulatory space
- Significantly reduced numbers of SSCs within the scope of Part 50 with Alternative 1
- Large numbers of SSCs within the scope of Part 50 with Alternative 2