

June 9, 2000

Mr. Ralph Beedle, Senior Vice President  
and Chief Nuclear Officer  
Nuclear Energy Institute  
Suite 400  
1776 I Street, NW  
Washington, DC 20006-3708

SUBJECT: NEI 00-02, PROBABILISTIC RISK ASSESSMENT PEER REVIEW PROCESS  
GUIDELINE (TAC NO. MA8899)

Dear Mr. Beedle:

On April 24, 2000, you requested Nuclear Regulatory Commission review of NEI 00-02, "Probabilistic Risk Assessment Peer Review Process Guideline." You requested this review to determine the guideline's applicability to rulemaking for the risk-informed categorization and treatment of nuclear plant equipment as described in SECY-99-256. The NRC staff has initiated review of this guideline.

We agree that the issues of PRA quality and application of risk insights to equipment categorization and treatment are closely related. Therefore, we plan to closely coordinate our review of applicable guidance documents to ensure operation within this risk-informed framework maintains safety, and properly focuses NRC and industry resources on safety-significant issues.

Enclosure 2 of your letter provides subtier criteria used to assess subelements of a PRA. Your letter stated that you are not requesting review of these criteria. However, the NRC staff believes that the subtier criteria are an integral component of the peer review process. Therefore, the subtier criteria must be reviewed in order to adequately assess the technical elements of the analysis. Since the subtier criteria are the basis you provide to distinguish between the level of PRA rigor required for different regulatory applications, we do not believe we can assess the capability of this guideline to fulfill the categorization process described in SECY-99-256 unless our review explicitly considers the subtier criteria. Furthermore, your submittal provides subtier criteria only for boiling water reactors. In order to determine applicability of NEI 00-02 to the SECY-99-256 rulemaking effort for pressurized water reactors (PWRs), we will also need to review the PWR subtier criteria.

In public meetings and workshops, we have initiated discussion of guidance being developed by NEI to implement this new categorization and treatment process. Our overall review schedule will depend upon timely submittal of your categorization and treatment guideline. We will inform you of our schedule plans after completion of our initial review. After receipt of the categorization and treatment guideline, we will schedule a public meeting where you can brief the staff on the guidelines contents, and we can discuss our plans for the guideline reviews.

Mr. Ralph Beedle

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The NRC project manager for this effort is Joe Williams. Mr. Williams can be reached at (301) 415-1470.

Sincerely,

***/RA Signed by Samuel Collins/***

Samuel J. Collins, Director  
Office of Nuclear Reactor Regulation

Mr. Ralph Beedle

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The NRC project manager for this effort is Joe Williams. Mr. Williams can be reached at (301) 415-1470.

Sincerely,

***/RA Signed by Samuel Collins/***

Samuel J. Collins, Director  
Office of Nuclear Reactor Regulation

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\*See previous concurrence

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