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NUCLEAR ENERGY INSTITUTE

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SENIOR VICE PRESIDENT AND
CHIEF NUCLEAR OFFICER,
NUCLEAR GENERATION

April 24, 2000

Mr. Samuel J. Collins
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Collins:

The industry has proactively developed and implemented a peer review process to address quality of probabilistic risk assessments. This process, originally developed by the boiling water reactor (BWR) owners' group, has been reviewed and revised to address all four NSSS systems, and was recently published as NEI 00-02, *Probabilistic Risk Assessment Peer Review Process Guidance*. All U.S. plants are scheduled to undergo the peer review process by the end of 2001. In light of increasing numbers of risk-informed licensing actions, and regulatory reform initiatives, we believe it would be beneficial for NRC to review the process, and we hereby submit NEI 00-02 for NRC review (Enclosure 1).

The process addresses level one, internal events PRAs, and evaluation of large early release frequency (LERF). In particular, we request NRC review of the process with respect to its applicability to Option 2 of the NRC's regulatory reform plan (SECY-99-256). The Option 2 application with respect to risk categorization is fairly well developed and understood, and industry has already provided NRC with an early draft of the categorization guideline. We believe it would be appropriate for NRC to review the categorization guideline and the peer review process in tandem. The peer review process provides a timely and effective method to address PRA quality issues for this particular application, and should be instrumental in streamlining NRC review and industry implementation of Option 2. As a minimum, the peer review results could be submitted in summary form as part of an Option 2 application, and NRC could use this information to focus their review (or subsequent assessment) accordingly.

We recognize that ASME is developing a standard for level one internal events PRA, and we are hopeful that the final form of the standard will comport well with the industry peer review process. However, the final form of the standard remains to be determined, and the overall development schedule is uncertain. Regardless,

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we believe the industry peer review process provides a robust and appropriate means to address PRA quality for the Option 2 application.

To assist NRC in their review, Enclosure 2 provides subtier criteria that are used to assist the peer review team in assessing the technical subelements of the PRA. This information reflects BWR applicability, and has not been reviewed by the full industry. We do not request NRC review of the subtier criteria, but rather provide them as information to support review of Enclosure 1.

We request a meeting with the NRR staff to discuss this submittal in detail, and to discuss an overall plan and schedule to achieve NRC endorsement of the process. We also recommend NRC consider participation on an upcoming peer review exercise. Industry self-assessment is an effective and efficient tool, and we believe full NRC understanding of the process requires observation of the process, in addition to review of Enclosure 1.

We look forward to working with the staff on this important effort. Please contact Steve Floyd (202-739-8078) or me if you need further information.

Sincerely,



Ralph E. Beedle

Enclosures:

1. NEI 00-02, *Probabilistic Risk Assessment Peer Review Process Guidance*
2. PSA Peer Review Subtier Criteria