

November 01, 2000

MEMORANDUM TO: Cynthia A. Carpenter, Chief
Generic Issues, Environmental, Financial
and Rulemaking Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

FROM: Joseph F. Williams, Project Manager/**RA**/
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF OCTOBER 18, 2000 MEETING REGARDING NEI 00-02,
"PROBABILISTIC RISK ASSESSMENT PEER REVIEW PROCESS
GUIDELINE" (TAC NO. MA8899)

On October 18, 2000, representatives of the NRC staff, the Nuclear Energy Institute (NEI), and other stakeholders met in Rockville, Maryland. The purpose of this meeting was to discuss the NRC staff's initial observations regarding NEI 00-02, "Probabilistic Risk Assessment Peer Review Process Guideline." These observations were described in a September 19, 2000 letter from David Matthews to Ralph Beedle. A list of the meeting participants is given in Attachment 1. Handouts provided by the staff are given in Attachment 2. NEI's handout is provided in Attachment 3.

As shown in the attached handout, the staff briefly reviewed recent activity associated with NEI 00-02. The staff noted that the observations documented in the September 19, 2000 letter were consistent with discussions in earlier public meetings, with additional detail and discussion. The staff stated that its observations reflected the views on PRA quality as described in SECY-00-162. The staff has not received any additional Commission guidance on this topic affecting the peer review assessment effort.

Throughout the discussion, NEI referred to its plans to develop an Option 2 submittal template, which will become part of its guideline for categorization and treatment of plant equipment. Amongst other things, this template would include facts and observations arising from the peer review, describing how these issues were addressed by a licensee. NEI expects that NRC would review these submittal prior to licensee implementation of the risk-informed alternative rules.

The staff has said on numerous occasions, most recently in SECY-00-0194, that its goal is minimal or no prior review of licensee plans to implement the Option 2 alternative rules. Therefore, it is very important that NRC, NEI, and other stakeholders understand how the Option 2 regulatory framework will be configured, so that expectations for submittals and staff review, if any, can be clearly established.

Meeting participants discussed the relationship between the peer review and the Integrated Decisionmaking Panel (IDP) implementing the Option 2 categorization guidance. NEI believes reports generated by the existing peer review provide adequate information, and so does not anticipate extensive changes to NEI 00-02 to address this topic. NEI acknowledged that additional discussion on this topic is needed in the categorization guidance.

Participants also discussed the staff's concern regarding the guideline's usage of subjective terminology in the subtier criteria used to assess PRA subelements. The staff has raised concerns that the using "may" or "should" is not sufficient to ensure minimum PRA attributes, as given in SECY-00-162, are fulfilled. Also, the staff has questioned whether the criteria will yield consistent objective results. NEI responded that the documentation developed by the peer review should largely address this issue. The review develops "facts and observations" which provide the basis for the assignment of action levels for PRA improvements. NEI also said that it expects to revise NEI 00-02 to address SECY-00-162 expectations.

In its September 19, 2000 letter, the staff had raised issues regarding the consistency between the pending ASME PRA standard and NEI 00-02. NEI considers peer review adequate to address PRA quality for Option 2, and does not rely upon the ASME effort to assure PRA quality for this effort. While ASME activities may provide useful insight which can be reflected in NEI 00-02, the industry plans to move forward with Option 2 activities using NEI 00-02.

The staff has also raised issues regarding the role of peer reviews which have already been completed, some of these before NEI 00-02 existed. While there has been some refinement of the process, the industry believes that NEI 00-02 (including the subtier criteria) reflects what has been done, and that the process has not changed appreciably over time. The subtier criteria provide clarification and consistency, but NEI claims that it is the responsibility of the peer review team to assign a grade.

The staff is planning to conduct site visits to observe peer review activities. Presently, the staff hopes to conduct one visit before the end of 2000, and another visit in the first quarter of 2001. The staff would like to observe one BWR and one PWR review. NEI offered to provide copies of peer review reports for other facilities to supplement these observation trips.

NEI is planning to complete its response to the September 19, 2000 letter in mid-November 2000. NEI would like to have an opportunity to react to the upcoming draft safety evaluation for the South Texas exemption request before it submits its response to the staff's letter. NEI and the staff agreed to additional discussions in telephone calls, as needed. Any draft materials provided by NEI will promptly be made public.

Attachments: As stated

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NRC/NEI Meeting

Discussion of Initial NRC Observations Regarding NEI 00-02

October 18, 2000

Name	Affiliation	E-mail	Phone
Joe Williams	NRC/NRR/DLPM	jfw1@nrc.gov	(301)415-1470
Bill Burchill	Commonwealth Edison	william.burchill@ucm.com	(630)663-2684
Doug True	ERIN	dettrue@erineng.com	(925)943-7077
Biff Bradley	NEI	reb@nei.org	(202)739-8083
Ed Burns	ERIN	etburns@erineng.com	(408)559-4514
Dave Bucheit	Dominion Generation	dave.bucheit@dom.com	(804)273-2264
Steve West	NRC/NRR/DRIP	ksw@nrc.gov	(301)415-1220
David Terao	NRC/NRR/DE	dxt@nrc.gov	(301)415-3317
Ed Wenzinger	NUS-LIS	ewensinger@scientech.com	(301)258-2490
Tom Scarbrough	NRC/NRR/DE	tgs@nrc.gov	(301)415-2794
Ken Heck	NRC/NRR	rch1@nrc.gov	(301)415-2682
Roger Huston	Licensing Support Services	roger@licensingssupport.com	(703)671-9738
Tim Reed	NRC/NRR/DRIP	tar@nrc.gov	(301)415-1462
Mary Drouin	NRC/RES	mxd@nrc.gov	(301)415-6678
Mike Cheok	NRC/NRR/DSSA	mcc2@nrc.gov	(301)415-8380
Mark Rubin	NRC/NRR/DSSA	mpr@nrc.gov	(301)415-3234
Parviz Moieni	SCE	moienip@songs.sce.com	(949)368-9349
Stanley Levinson	FTI	slevinson@framatech.com	(804)832-2738
Craig Sellers	ITS/Consumers		(410)394-1504
Tony Pietrangelo	NEI	arp@nei.org	(202)739-8081
Barry Sloane	Westinghouse	sloanebd@westinghouse.com	(412)374-4047