

November 2, 2000

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

FROM: Joseph F. Williams, Project Manager */RA/ Signed by J. Williams*  
Project Directorate IV  
Division of Licensing Project Management

SUBJECT: SUMMARY OF OCTOBER 18, 2000 MEETING REGARDING RISK-  
INFORMED PART 50 NUCLEAR ENERGY INSTITUTE  
CATEGORIZATION GUIDANCE (TAC NO. MA8584)

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 a draft guideline for categorization of structures, systems, and components (SSCs) for implementation of risk-informed Part 50 Option 2. These observations were described in a September 26, 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.

As shown in the attached handout, the staff briefly reviewed recent activity associated with review of the categorization guideline. The staff noted that the observations documented in the September 26, 2000 letter were consistent with discussions in previous public meetings, with additional detail and discussions.

Meeting participants discussed the central role of the integrated decisionmaking panel (IDP) in the categorization process. NEI stated that a draft IDP description has been developed, though they are concerned regarding the level of detail expected by the staff. NEI plans to provide an IDP description that provides detail similar to the proposed 10 CFR 50 Appendix T, but has noted that South Texas Project Option prototype submittals have provided significantly more detail. NRC representatives said that a level of detail consistent with Appendix T should be sufficient. Participants acknowledged the difficulty in describing an IDP process that is objective and repeatable, providing latitude for decisions without reducing the process to an algorithm.

In the discussion of change control processes, NEI agreed that 10 CFR 50.59 will apply to RISC-3 SSCs, including when a licensee wishes to change the classification of these SSCs to RISC-4. Participants also discussed the staff's view that the PRA must reflect the as-built, as-operated plant. The staff does not expect that PRA's will be thoroughly revised for all facility changes, but does expect that changes will be screened for their effect on the PRA, with significant changes receiving additional attention.

NEI agreed that SSC performance monitoring should reflect all failures and unavailabilities. The staff acknowledged that while the maintenance rule addresses only maintenance preventable failures and unavailabilities, many licensees may have implemented the rule in a broader fashion. NEI considers monitoring and corrective action to be predominately a treatment issue, though the staff noted the importance of these processes for validating assumptions made in SSC categorization.

The meeting did not extensively address the revisions to the "4-box" diagram defining the RISC categories, as described in SECY-00-194. NEI said that it considers this topic to be a policy issue which could be the topic for another meeting on higher-level Option 2 issues.

In SECY-00-194, the staff has said that it holds a goal of no prior review and approval of licensee's efforts to implement Option 2 rules. However, NEI is assuming that there will be staff review of licensee submittals. The basic issues include the level of detail in the guideline documents, what information will be submitted, and what will be known about implementing procedures and processes. The staff stated that, whatever form it takes, the process must be objective, documented, and repeatable.

Participants also discussed selective implementation. NEI believes that the position expressed in SECY-00-194 that all RISC-1 and RISC-2 SSCs be identified is too restrictive, and will inhibit Option 2 implementation. NEI stated that, in its view, baseline performance prior to completely categorizing SSCs is acceptable, and that performance monitoring should maintain that acceptable level.

For the specific observations described on the last 3 slides, NEI indicated that it understands the issues, and will provide appropriate discussion in the guideline for those topics. In particular, NEI agreed to provide guidance to the IDP, consistent with Appendix T, to address risk indices outside the scope of the PRA, and to provide clarification for the application of a figure used to ensure defense-in-depth is preserved.

NEI is planning to complete its response to the September 26, 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

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# **NEI Option 2 Categorization Guideline**

Discussion of Initial NRC Staff Observations

October 18, 2000

## **Agenda**

- Introductions
- Review topics from September 26, 2000 letter
- Provide clarifications
- Schedule
- Meeting feedback forms

## **Background**

- Categorization guidance provided at March 30, 2000 meeting
- Preliminary views discussed at April 20, 2000 meeting
- September 26, 2000 letter provided initial NRC observations

## **General Observations**

- Need details for
  - Integrated Decisionmaking Process
  - Change control process
  - SSC monitoring and corrective action
  -
- PRA must reflect as-built, as-operated plant
- Revised “4-box” diagram effect
- Prior review and approval

## **Specific Observations**

- **Mapping of SSCs to the PRA**
  - How does categorization account for SSCs implicitly modeled or credited in the PRA?
- **Risk indices outside the scope of the PRA**
  - Emergency preparedness (EOPs and SAMGs)
  - Fission product barriers
  - Accident mitigation

## **Specific Observations, cont.**

- **Defense-in-depth**
  - Commensurate with event consequences
  - Compensate for analysis uncertainty
- **Sensitivity studies**
  - Should increase and decrease common cause and human error probabilities
  - IDP usage of sensitivity results

## **Specific Observations, cont.**

- Importance rankings for external events, and low power and shutdown modes
- External events and operating modes not modeled in the PRA
  - How will failure probabilities for safe shutdown paths not modeled in PRA be accounted for?
  - Role of defense-in-depth