

March 13, 2001

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

Dear Mr. Beedle:

At the November 21, 2000, public meeting between NRC's PRA Steering Committee and NEI's Risk-Informed Regulation Working Group, we discussed the topic of public dissemination of up-to-date, plant-specific PRA information. This topic was of interest for several reasons, including issues related to the staff's use of risk information in its risk-informed regulation work, the recent Union of Concerned Scientists report, which, among other things, discussed the lack of up-to-date, publicly available PRA information newer than that in the IPEs and IPEEEs, and the agency's goal to improve public confidence, which includes making public participation in the regulatory process more accessible. At the meeting, I agreed to provide NRC's perspectives on this topic, including our views on the type of PRA information which we believe should be made publicly available, and specific regulatory uses of the information. Each of these is discussed below.

In SECY-00-0162 ("Addressing PRA Quality in Risk-Informed Activities," July 28, 2000), the staff discussed the level of PRA quality needed for risk-informed regulatory decision making. To paraphrase this discussion in the context of public dissemination of PRA information, we believe that:

For a regulatory decision relying upon risk insights as one source of information, there needs to be confidence by all stakeholders in the PRA results from which the insights are derived. Consequently, to give an appropriate level of confidence by all stakeholders in the results used in the regulatory decision-making, the PRA needs to have the proper scope and technical attributes, as well as proper public availability of the appropriate level of PRA information. It is recognized that these aspects can vary depending on the specific decision under consideration.

The most recent publicly available PRA information is the IPEs and IPEEEs which reflect PRA and plant information that is generally a decade old. Since this time, the industry has performed major updates which are not publicly available. We believe it is in the best interest of all stakeholders to make publicly available a level of up-to-date PRA information that reflects the current design and operational practices of each licensed plant. For example, this would include estimates of core damage frequency (from all initiators studied) and large early release frequency, as well as descriptions of dominant accident sequences, results of sensitivity studies, important human actions, and key assumptions. However, we recognize that this would be a voluntary initiative by the industry.

R. E. Beedle

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Nevertheless, we believe this would be an important initiative since, in addition to supporting improved public confidence, the staff could use this information to make better risk-informed decisions in areas such as:

- risk-informing 10 CFR 50
- resolving generic safety issues
- performing regulatory analysis in support of generic or plant specific regulatory actions

As regards information needed to support risk-informed licensing actions, guidance has been published by the staff in the regulatory guides for these applications (e.g., using Regulatory Guide 1.174 for licensing amendments). PRA information submitted in support of risk-informed licensing actions would be publicly available, subject to requests for withholding in accordance with 10 CFR 2.790.

I suggest that we meet again to discuss our perspectives, and how we together can improve and maintain the quality and quantity of PRA information that is publicly available.

Sincerely,

/RA/ Ashok C. Thadani

Ashok C. Thadani, Director  
Office of Nuclear Regulatory Research

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