



*United States*  
*Nuclear Regulatory Commission*

---

**RISK-INFORMED PART 50  
SPECIAL TREATMENT REQUIREMENTS  
RIP50 OPTION 2**

**Public Meeting  
June 27, 2001**



*United States  
Nuclear Regulatory Commission*

---

## PURPOSE OF RIP-50 OPTION 2 PILOT PROGRAM

- To collect sufficient information to enable the staff to develop a rule, statements of consideration, regulatory analysis, and a regulatory guide to support the RIP-50 Option 2 effort.
- To collect sufficient information to determine the extent to which the staff can endorse the NEI Option 2 guidance without exception



## PURPOSE OF OUTLINE PROVIDED WITH MEETING NOTICE

- To document the staff's initial thoughts on plans, expectations, and views with respect to the following areas related to the Pilot Program Effort:
  - Why the Pilot Plant effort is needed and its overall objectives
  - What the Option 2 Pilot Plant effort will be piloting (scope and breadth of pilots)
  - How the Option 2 Pilot Plant effort will be conducted (including staff interaction)
  - The measures that the staff will be using to assess progress/success of the Pilot Plant effort



*United States  
Nuclear Regulatory Commission*

---

- The staff members responsible for individual pieces of the Pilot Plant effort
- Which plants will participate in the Pilot Plant effort
- The schedule for the Pilot Plant effort
- How the results of the Pilot Plant effort will be documented by pilot plant licensees, owners' groups, NEI, and the NRC
- The regulatory mechanism for implementing the pilots (e.g., exemptions)



*United States  
Nuclear Regulatory Commission*

---

## STAFF'S OBJECTIVE IN PROVIDING THE OUTLINE

- Share our initial thinking with external stakeholders
- Get stakeholder input/feedback to enable us to further develop the outline



## OVERVIEW OF RESOLUTION OF STAFF COMMENTS

- Staff provided NEI comments on revision A2 of NEI 00-04 in letter dated April 4, 2001.
- Based on approx 1 week of review the following comments are resolved/not resolved/still under review:
  - Resolved: Comments 2, 4, 9, 21, 22, 25, 32, 66, 69, 71
  - Not Resolved: Comments 11, 18, part of 26, 30, 33, 64
  - Still under review-- remaining issues



## DISCUSSION OF SOME KEY OPEN ISSUES

- Long-term containment integrity-- phone call (5/17) represents the RILP position on the issue (ML 011490303)
- May not be communicating on “selective implementation”
  - Maintain all important inputs and assumptions (even for SSCs not yet categorized)
  - When SSCs are categorized, “bounding conditions” may be identified (conditions necessary to support the categorization) that need to be maintained



## DISCUSSION OF SOME KEY OPEN ISSUES CONT'

- Comment 47 (RISC-3 Treatment) -- Open issue
  - Note that NEI 00-04 RISC-3 treatment guidance is significantly different than STPNOC approach (i.e., FSAR)
  - NEI 00-04 uses language like “industrial level controls” suggesting no controls on the processes applied to RISC-3 SSCs –(not consistent with STPNOC nor Option 2 direction)
  - Expect that there will be comments in the treatment area—where NEI 00-04 incorporates new information
- Staff would like to see NEI 99-04 rev 1 to understand RISC-3 commitment management approach