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STARS-01004

September 25, 2001

Rules and Directive Branch,
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

66 FR 38332
7/23/01
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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON DRAFT REGULATORY GUIDE DG-1110
AN APPROACH FOR USING PROBABILISTIC RISK ASSESSMENT
IN RISK-INFORMED DECISIONS ON PLANT-SPECIFIC CHANGES
TO THE LICENSING BASIS**

Docket Numbers: 50-483, 50-482, 50-498, 50-499, 50-275, 50-323, 50-445, 50-446

The following comments on Draft Regulatory Guide DG-1110, "An Approach for Using Probabilistic Risk Assessment in Risk-informed Decisions on Plant-specific Changes to the Licensing Basis," are submitted on behalf of all the STARS¹ utilities as an attachment to this letter.

The Nuclear Energy Institute (NEI) and the Westinghouse Owner's Group (WOG) are also submitting comments on this draft regulatory guide on behalf of the nuclear energy industry. This letter also acts as an endorsement of those comments.

In general, the Draft Regulatory Guide appears to incorporate more prescriptive requirements by expanding the scope of considerations and analyses than what is contained in the current Regulatory Guide 1.174. Although useful additional clarification and guidance has been provided for integrated decision making, there are concerns that the additional detail delineated in the Draft Guide represents a trend toward more burdensome and costly risk informed analysis requirements. It will be important for promoting industry participation to ensure that risk informed approaches pursued by the industry be evaluated based on those

¹ The STARS group consists of five plants operated by TXU Electric, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company and STP Nuclear Operating Company.

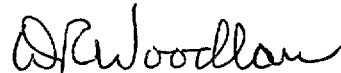
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applicable regulatory guide requirements necessary to demonstrate acceptability while also allowing flexibility to ensure that required information is commensurate with safety significance.

Thank you for the opportunity to comment. Please contact me if there are any questions (254-897-6887 or dwoodla1@txu.com).

Sincerely,



D. R. Woodlan, Chairman
Integrated Regulatory Affairs Group
Strategic Teaming and Resource Sharing
(STARS)

DRW/dw

Attachment: Comments on Draft Regulatory Guide DG-1110, "An Approach for Using Probabilistic Risk Assessment in Risk-informed Decisions on Plant-specific Changes to the Licensing Basis"

**Comments on Draft Regulatory Guide DG-1110,
“An Approach for Using Probabilistic Risk Assessment
in Risk-informed Decisions on Plant-specific Changes
to the Licensing Basis”**

Technical acceptability has replaced quality assurance in some areas of the standard. Guidance is provided in Section 2.2.3 and Appendix A for assessing technical acceptability, but the change in emphasis from Quality Assurance to Technical Acceptability is noted.

1. Section 2.2.3.1 – The last paragraph states that a Probabilistic Risk Assessment (PRA) that is missing one or more elements in Table 2, Technical Elements of an Acceptable PRA, would not be considered a complete PRA. The table identifies internal fire analysis and external hazards analysis as required technical elements. Most PRAs do not typically include these elements in a Risk-Informed application submittal.

COMMENT: It is not apparent how lack of these elements will affect a Risk-Informed application review.

2. Section 2.2.6, Integrated Decision-making – The second paragraph implies that a review of other plant PRAs may be a necessary attribute for specific types of risk-informed applications (such as motor-operated valves MOVs).

COMMENT: This has not been a requirement of past Risk-Informed applications.

3. Appendix A, Level 2 PRA – The Interpretation of Results section identifies a requirement for examining results from importance measures (F-V, risk achievement, risk reduction, and Birnbaum) to identify contributions of various elements to the model estimation of Large Early Release Frequency (LERF) “*and Large Late Release Probability*”. The latter statement can be interpreted as a new quantification requirement for Risk-Informed applications.

COMMENT: A basis for quantification of Level II models to determine Large Late Containment Failure frequency has not been established.

COMMENT: What are the acceptance criteria for licensing basis changes based on Large Late Containment Failure?

4. Appendix A, Internal Fire – The Fire damage analysis section requires analysis of fire scenarios that cause an initiating event, affect the plant’s ability to mitigate **AN** initiating event, **OR** affect potentially risk-significant equipment. Most fire PRAs analyze fire scenarios that cause an initiating event **AND** affect the plant’s ability to mitigate **THE** initiating event. This statement has a potential for requiring a significant increase in the number of fire scenarios that must be evaluated in a PRA.

COMMENT: Are current fire hazards analysis in PRAs required to be updated to conform to the latest RG 1.174 guidance?