From: Steven Long NRR
To: Patrick Milano NRR
Date: 3/28/01 7:49AM
Subject: Clarified Q1 paragraph

Pat,

I discussed the material with Gareth last night. We agree on the technical issues, but he thought the my wording should be clearer. So, I took a stab at clarifying it this morning. However, I suspect that Doug isn't seeking this type of clarification, but rather an endorsement of the current ROP guidance on *how* to consider overlapping issues in the Action Matrix. His problem is that Gareth and I don't think we can endorse that as the "right" way to consider such things in all cases.

Also, I found that I should change the word "miscalibration" to "misalignment" in the 3rd sentence of the 4th paragraph of my answer.

Steve

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However, for other cases where the results may be a pair of "whites" or a "white" and a "yellow," when evaluated separately, there may be potential for a "red" when taken together. That could change our regulatory response. As discussed in response to question 4, the written SDP procedures have been revised to make it clear that it is our intent to quantify the effects of concurrent conditions to the extent that it is feasible to do so. However, this is complicated because PRA cutsets involve multiple equipment failures. So, multiple performance errors on the part of a licensee may (or may not) have multiple effects on the same cutsets. If so, it is a difficult logic problem to ~~capture~~ independently assign to each performance problem its ~~the~~ full risk impact ~~of each performance problem~~ without making the sum of the results for all the performance problems exceed the total change in the plant's risk due to that combination of problems ~~over the period(s) of concern~~. Because the ROP Action Matrix is based on the numbers of items with specific colors in each specific cornerstone, it is not conceptually straight-forward to assign appropriate colors to each of a group of items that, together, create more risk than the sum of their individual effects.