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

Comments on Draft Regulatory Guide DG-1122
"An Approach for Determining the Technical Adequacy
of Probabilistic Risk Assessment Results for Risk-Informed Activities"

STP Nuclear Operating Company has reviewed the subject draft regulatory guide and offers the comments below. We appreciate the opportunity to provide input on this guidance.

1. The DG addresses the necessary elements of a PRA that supports a risk-informed application. However, it does not address the degree of rigor those elements should have for various kinds of applications. For instance, a PRA that is acceptable for a simple allowed outage time extension for a single system might not be acceptable for a broad-scope configuration risk management application that requires essentially "real time" tracking of configuration risk.
2. Section 4.3 of the DG describes documentation requirements for risk-informed applications. This information should not be required with every submittal. The guidance should clarify that previously provided documentation may be referenced if it is adequate for the subject submittal.
3. The DG would be an appropriate place to define criteria for a PRA program that would preclude the need to submit specific PRA information with each risk-informed application. For PRAs that meet the programmatic criteria, a licensee would only have to confirm that the PRA is current or identify and justify differences.
4. A significant amount of risk-informed work is being developed by industry at an owners group or generic level; however, it is not clear how the guidance would be applied to owners group topical reports or other submittals that are applicable to more than one licensee. The DG should outline general expectations for the contents of topical reports with regard to the quality of the PRAs used for data in the PRA and the quality of the PRAs for licensees that will implement the topical.

If you have any questions, please call Wayne Harrison at (361) 972-7298 or me at (361) 972-7136.

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