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Dominion

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

GL02-073

COMMENTS ON DRAFT REGULATORY GUIDE DG-1122

Dear Sirs:

Virginia Electric and Power Company (Dominion) and Dominion Nuclear Connecticut appreciate the opportunity to comment on the draft regulatory guide, DG-1122, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," as requested in the Federal Register, volume 67, number 243, page 77530 on December 18, 2002. Our comments are as follows:

1. The clarifications in Table A-1 and Table B-1 requiring peer reviews for "PRA maintenance resulting in significant changes to the PRA results" is impractical and unduly burdensome. Using the definition of "significant" from the clarification in Section 2.2 would require peer reviews whenever the PRA results change the second significant figure (i.e., 1%) of the results. Since the PRA results typically change by 1% or more in most industry PRA updates, this requirement would lead to peer reviews for almost all industry PRAs whenever updated (i.e., at least once every three years). With the average cost of a limited scope peer review ranging from $20,000 to $50,000 per review, the industry cost would be substantial. Maintenance changes are adequately reviewed in the licensee's independent checking process. Table A-1 should be revised to indicate that PRA maintenance be independently reviewed by qualified PRA staff and that the changes in dominant contributors from PRA maintenance be identified and explained in the PRA results.

2. In Table 2, the inclusion of large late release frequency risk metric in the scope of the PRA results should be dependent on the application, not a general requirement, since the current regulatory guidance (e.g., Regulatory Guide 1.174) for risk-informed applications does not utilize this metric for risk-informed decisions. Since most current living PRA models

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do not calculate this risk metric, modification of the existing models to calculate large late release frequency would be unnecessary for most current risk-informed applications and unduly burdensome for those licensees who do not wish to undertake more costly future applications which might require calculation of this risk metric. Table 2 should be modified to specify that large late release frequency is calculated when required by the application.

3. In Table A-1 and the ASME PRA Standard, the term "state-of-knowledge correlation" is undefined. The NRC qualification which applies this term to estimation of the mean CDF is unclear. Table A-1 should be revised to include a definition for the term "state-of-knowledge correlation."

4. In Tables B-1 and B-2, the clarifications indicate that "a grade for a specific PRA subelement implies that all of the requirements listed in the NEI subtier criteria have been met" and "that the self-assessment process is predicated on the requirement that all of the requirements in the NEI subtier criteria are interpreted as 'shall' being required." The industry peer review process was not always implemented consistent with these clarifications. The regulatory guide should be more explicit in ensuring that either these clarifications were consistent with the peer review process or those NEI subtier criteria not reviewed in their peer review process consistent with the clarification be included in the self-assessment process.

If you have any questions regarding our comments, please contact:

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Respectfully,

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