

NOTE TO COMMISSIONER ASSISTANTS

OCM/RM	OCM/GJD	OCM/EM	OCM/JM
 X Dennis Rathbun Mike Tschiltz Alan Levin Julio Lara Keith McConnell Mark Thaggard Bob McOsker Marian Zobler Karen Henderson Clare Kasputys Barbara Gabriel Linda Herr Terry Agneu 	X Brad Jones Cynthia Jones Tom Hiltz Joe Olencz Jose Ibarra Donna Smith Noble Green	X Janet Schlueter Kathryn Winsberg James Beall Jeffry Sharkey Linda Lewis Judy Ledbetter	X Lynne Stauss Margie Doane Brian McCabe John Thoma Heather Astwood Lorna Kipfer Tojuana Fortune
	/. Craig /RA/ nt for Operations, OEDO		

SUBJECT: SUMMARY TABLE OF RISK INFORMED INITIATIVES

Attached for your information is a table summarizing risk-informed initiatives which summaries specific initiatives, and recent, current, and future activities.

Attachment: As stated

×,

- cc: W. Travers, EDO (w/attachment)
 C. Paperiello, DEDMRS (w/o attachment)
 W. Kane, DEDR (w/attachment)
 P. Norry, DEDM (w/attachment)
 S. Reiter, CIO (w/o attachment)
 J. Craig, AO (w/attachment)
 J. Shea, OEDO (w/attachment)
 S. Collins, NRR (w/attachment)
 - D. Matthews, NRR (w/attachment)

SECY (w/attachment) OGC (w/attachment) OCA (w/attachment) OPA (w/attachment) OIP (w/o attachment) CFO (w/o attachment) EDO R/F (w/attachment)

U15

- Internal Use Only -- Not for Public Disclosure

RISK-INFORMED INITIATIVES

INITIATIVE	RECENT ACTIVITIES	CURRENT ACTIVITIES	FUTURE ACTIVITIES
1. Revised Oversight Process			
- Performance indicators (PIs)	- analysis of PIs	 development of risk-based PIs analysis/trending of PIs 	 continue development and possible implementation of risk- based PIs
- Plant & system reliability studies	- developed databases to track LERs and common-cause failures (CCFs)	- analyzing data on reliability and CCFs	- work with industry to develop consistent approach for safety system unavailability reporting
- Significance determination process (SDP)	- developed SDP - ROP action matrix	- implementing/improving SDP	 issue plant specific SDP notebooks revise ALARA, physical protection, SDP evaluate fire protection, shutdown, external events, concurrent deficiences
2. Risk-informed Licensing Actions	Developed guidance documents - general guidance (RG 1.174 and SRP chapter 19) - IST (RG 1.175 and SRP section 3.9.7) - GQA (RG 1.176 and GQA inspection guidance) - TS (RG 1.177 and SRP section 16.1) - ISI (RG 1.178 and SRP section 3.9.8) Issued hundreds of risk-informed amendments over last few years	Updating guidance documents Reviewing increasing number of risk-informed amendments	Publish revisions to guidance documents Evaluate additional industry proposals (e.g., eliminate PASS requirements, extend ILRT interval)

¥

.

INITIATIVE	RECENT ACTIVITIES	CURRENT ACTIVITIES	FUTURE ACTIVITIES
3. Risk-informed technical specifications	 Working with NSSS owners groups and NEI to coordinate submittals Goal is to reflect safety significance of the condition or requirement Eight industry initiatives modified end states missed surveillance flexible mode restraints risk-informed AOTs with a backstop optimize surveillance frequencies modify LCO 3 0.3 to about 24 hours define actions to be taken when equipment is not operable but functional risk-inform the scope of the TS rule 	Reviewing submittals for initiatives 1-3	Continue reviews of initiatives
4 Maintenance Rule	 New section (a)(4) effective 11/28/00 RG 1.182 endorses industry guidance document for managing risk during maintenance activities 	Coordinating implementation with risk-informed technical specifications	Effectiveness review

e7+

INITIATIVE	RECENT ACTIVITIES	CURRENT ACTIVITIES	FUTURE ACTIVITIES
5. Fire protection	 NFPA-805 issued in April 2001 alternative performance- based risk-informed fire protection standard for nuclear power plants. Circuit Analysis Resolution Program 	 staff working on proposed rulemaking that would endorse NFPA 805 as a voluntary alternative to NRC existing fire protection regulations staff working with industry to develop risk-informed post-fire safe shutdown methodology document 	
6 Safeguards	 Proposed revisions to 10 CFR 73.55 sent to Commission 6/4/01 Requires that licensees' security programs be based on risk-informed target sets of equipment necessary to prevent core damage and/or spent fuel sabotage 		
7. Reporting Rules	 Revised 10 CFR 50.72 and 50.73 effective 1/23/01 Focuses on reporting only events that are risk-significant 	- Evaluating reports to determine effectiveness of new rules	
8. Alternate source term	 New rule (10 CFR 50.67) published 12/23/99 Allows for application of improved knowledge of fission product releases and plant performance 	- Evaluating license amendments that take advantage of new rule	

•••

432

INITIATIVE	RECENT ACTIVITIES	CURRENT ACTIVITIES	FUTURE ACTIVITIES
9. RIP50/Option 2 (risk- informing scope of special treatment requirements)	- Published ANPR 3/00 - STPNOC exemptions reviewed	 Reviewing industry guidance documents Pilot plants starting process 	 Complete review of industry guidance documents Review pilot plants results Publish proposed and final guidance (10,050,50,00)
10. RIP50/Option 3 (risk- informing technical requirements)	 Developed framework document to guide future efforts Completed detailed technical review and proposed changes to 10 CFR 50 44 Completed feasibility study of risk-informed changes to 10 CFR 50.46 	 Developing proposed rule changes for 50.44 Developing technical basis for proposed changes to 50.46 and associated rules Developing technical basis for risk-informed changes to 10 CFR 50.61 	rules (10 CFR 50.69) - Publish final revisions to 50.44 - Publish proposed and final rule changes to 50 46 - Publish proposed and final rule changes to 50.61
11. PRA standards	 Working with ASME on internal events standard Working with ANS on low power and shutdown standard Industry developing guidance on peer reviews 	 Continuing work with ASME and ANS Reviewing industry guidance on peer reviews 	- Endorse industry standards generically or for specific applications (e.g., Option 2)
12. Creating a risk-informed environment	- Began effort within NRR to create environment in which risk-informed methods are fully integrated into staff activities	- Evaluating current environment	 Establish target environment Implement target environment Assess effectiveness

•

INITIATIVE	RECENT ACTIVITIES	CURRENT ACTIVITIES	FUTURE ACTIVITIES
13. New regulatory licensing approach	- Exelon submitted risk-informed, top-down approach for licensing pebble bed modular reactors (PBMR) similar to General Atomics MHTGR approach in early 1990's	- RES/NRR working group evaluating Exelon proposal - Ongoing meetings with Exelon	 NEI working with Exelon and developing a more generic approach for any new plant (framework modeled on ROP) Commission paper planned in November on Exelon's approach
14. Construction Inspection Program reactivation	- Use of risk insights in the Construction Inspection Program are being proposed by NEI.	- Ongoing meetings with NEI	

٠

• • • •

.