

April 30, 2003

MEMORANDUM TO: David Lew, Acting Chief  
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Office of Nuclear Regulatory Research

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SUBJECT: SUMMARY OF MARCH 12, 2003, PUBLIC MEETING WITH  
INTERESTED STAKEHOLDERS FOR DISCUSSION  
REGARDING THE PLAN FOR IMPROVING COHERENCE  
AMONG REACTOR ARENA RISK-INFORMED ACTIVITIES

The staff held a public meeting with interested stakeholders on March 12, 2003, to discuss the NRC's plans for improving coherence among reactor arena risk-informed activities. In addition, the preliminary results of a staff review of risk-informed activities relevant to the coherence issue were presented and discussed. The staff described the current approach for improving coherence in risk-informed activities which is a program aimed at ensuring that reactor regulations, staff programs, and processes are: (1) built on a unified safety concept, and (2) properly integrated so that they complement one another.

The staff's report on the preliminary findings of its review of risk-informed activities described the staff's findings in the four areas of this review: (1) "Green" findings of inspection reports from the Reactor Oversight Process (ROP), (2) Risk informing 10CFR50, involving a mapping of the regulations vs. the four reactor safety cornerstones, (3) Regulatory Basis for categorizing systems, structures, and components (SSCs) as "Safety-Related," and (4) Reactor Licensing Action Requests (LARs). The attached meeting handouts include additional details on the Coherence Plan and the staff's preliminary review findings and insights.

The meeting discussions were very useful as feedback on the coherence program. It was commented that while the "Green" ROP findings do appear to be a worthwhile area to pursue, it was suggested that regulations that are found to be associated with numerous Green findings should also be evaluated to determine if some of these same regulations (or maybe specific

parts of these regulations) are also responsible for findings of higher risk significance, e.g., White or Yellow findings, and therefore such regulations should not necessarily be identified as candidates for change based only upon the Green findings. A suggestion was made to characterize these studies as seeking to better focus attention on the most important safety issues as opposed to simply seeking burden reduction. In keeping with this thought, it was suggested that a study of the most numerous findings that are classified as White or Yellow would also be useful to attempt to identify those regulations that are responsible for the more risk-significant violations. Interest was also expressed in determining if there were any differences in the results regarding the number of inspection findings for BWRs vs. PWRs, and newer vintage plants vs. older.

The staff reported its preliminary findings regarding a mapping of the 10CFR50 regulations with respect to the four reactor safety cornerstones. The results were believed to be useful in understanding the basic makeup of the existing regulations, however, it was agreed that it is not clear what should be concluded from this information, or if much further work should be done in this area. The staff indicated that possibly a trial effort will be made to extend the mapping down to the level of the individual requirements within the regulations, and to consider the relationship between these requirements and the safety challenges addressed by the cornerstones.

The staff presented its evaluation of the regulatory basis for the assignment of certain SSCs to being "safety related." It was concluded that this information is also useful for understanding the existing regulations, but again, it was not clear if this work should be expanded.

The fourth area of study that was reported was the evaluation of industry LARs to attempt to identify areas of the regulations that have been associated with a high incidence of LARs, so that these regulations can be considered for potential risk-informed improvements. The staff reported that information was being collected from an NRC LAR database but that results were not yet available for this meeting. The representative from NEI stated that they had done some investigating into the LAR records and had found it to be extremely labor extensive. The representative from Westinghouse stated that they had generated a large list of regulations that might be candidates for some revision prior to licensing advanced reactors. The staff indicated that the Westinghouse list would be useful to compare against the current coherency studies.

Regarding future work, it was agreed that the staff's ROP studies would be extended to some additional Green findings; providing for some balance between BWRs and PWRs, and perhaps by plant age; to determine if the initial characterization of the regulations responsible for the most findings reports is accurate. Once the identification of the most prevalent regulations associated with Green finding reports is established, an attempt will be made to understand what specific criteria within these regulations are responsible for the required reporting. Also, additional studies into the occurrence of White and Yellow findings will be considered as discussed above. A suggestion was made regarding prioritizing future work, that it may be best to not focus much additional effort on Technical Specifications and 10CFR50.55a (Codes and Standards) at this time, since these areas are being addressed in other NRC activities. However, it was also noted that there would be value in comparing the results of this effort regarding Technical Specifications and 10CFR50.55a with the results of the other NRC activities in these areas to either confirm agreement or to identify possible disagreements.

The assessment of the data for LARS will be continued to look for insights into which regulations are most often associated with LARs. As a lower priority, the mapping of requirements within the regulations vs. cornerstone challenges will be pursued. No additional work was identified at this time for the review of the regulatory basis for the classification of safety-related SSCs.

A followup meeting on the Coherence Program will be scheduled in the near future.

Attachments:

1. List of Attendees
2. Meeting agenda
3. Meeting handouts

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PLANS FOR IMPROVING COHERENCE AMONG  
REACTOR ARENA RISK-INFORMED ACTIVITIES  
NRC, ROCKVILLE, MARYLAND  
March 12, 2003

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March 12, 2003

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PUBLIC MEETING  
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REACTOR ARENA RISK-INFORMED ACTIVITIES  
NRC, ROCKVILLE, MARYLAND  
MARCH 12, 2003

**AGENDA**

- Introduction
- Summary of Coherence Plan
- Presentation of Coherence Plan Activities
  - Development of Coherence Process
  - Preliminary Findings/Insights of Staff Review of Risk-Informed Activities

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**Meeting Handouts**

- NRC Coherence Program for Reactor Safety Arena
- Preliminary Findings/Insights of Staff Review of Risk-Informed Activities