

July 22, 2003

MEMORANDUM TO: Scott F. Newberry, Director
Division of Risk Analysis and Applications
Office of Nuclear Regulatory Research

FROM: Farouk Eltawila, Director **/RA/** by Farouk Eltawila
Division of Systems Analysis and Regulatory Effectiveness
Office of Nuclear Regulatory Research

SUBJECT: COMMENTS ON MITIGATING SYSTEMS PERFORMANCE INDICES
(MSPIs) WHITE PAPER

We note development of the MSPIs represents a significant staff effort, and that the MSPIs are an improvement over existing performance indicators which are less robust. The following comments are provided for your consideration in response to your request of May 12, 2003:

Consistent with comments from the Advisory Committee on Reactor Safeguards (ACRS) Subcommittees on Reliability and Probabilistic Risk Assessment, and Plant Operations (July 8, 2003), we also encourage additional discussion of the limitations and intended uses of the MSPIs in the white paper. Greater clarity on these points in the white paper and other forums will provide additional assurance that the MSPIs are not misused or misconstrued which could increase uncertainty in their application and reduce public confidence in their ability to assess licensee performance.

The MSPIs can become an integral part of the NRC's oversight of operating reactors. As such, the MSPIs will provide a basis for NRC actions and decisions concerning licensees. We recommend that the MSPI process maximize and make publicly available all relevant information, e.g. supporting risk information and data, MSPI oversight activities, and associated regulatory decisions and actions resulting from application of the MSPIs. We note that this comment is similar to a position taken by the ACRS Chairman in Reference 1.

If you have any questions regarding these comments, please contact John V. Kauffman, E-mail: jvk@nrc.gov (301)-415-6830.

Reference

1. Letter from Dana Powers, NRC, to R. Meserve, NRC, "Union of Concerned Scientists Report, 'Nuclear Plant Risk Studies: Failing the Grade,'" October 11, 2000.

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