

June 7, 2004

Dr. Mario V. Bonaca, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: DRAFT PLAN FOR IMPLEMENTATION OF THE COMMISSION'S PHASED
APPROACH TO PROBABILISTIC RISK ASSESSMENT QUALITY

Dear Dr. Bonaca:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am writing in response to your April 27, 2004, letter on the draft plan for implementation of the Commission's phased approach to Probabilistic Risk Assessment (PRA) quality. In the letter, you described the Advisory Committee on Reactor Safeguards (ACRS) conclusions and recommendations on the NRC's work in response to the Commission's December 18, 2003, staff requirements memorandum (SRM). Our comments on the ACRS conclusions and recommendations are provided below.

1. *The NRC staff has developed a practical strategy that would encourage the development of guidance documents necessary to implement the Commission's phased approach to PRA quality.*

We are pleased that the ACRS believes the strategy outlined in the draft plan will meet the Commission's objectives. We will submit the final plan to the Commission by June 30, 2004.

2. *The staff review of an application using a PRA with a scope greater than that for which guidance documents exist should not be given low priority.*

We agree that such applications should not automatically be given low priority. We have modified the draft plan to include the development of a process for prioritizing and scheduling submittal reviews.

3. *Proactive licensees should not be discouraged from pushing the boundaries of the state of the practice by the prospect of low priority staff review. Licensees should be encouraged to address in their application the relevant technical issues cited in the December 18, 2003, SRM. The staff should give high priority to these reviews.*

We agree that proactive licensees should not be discouraged from pushing the boundaries of the state of the practice. This is one of the issues we intend to consider in the development of a process for prioritizing and scheduling application reviews.

4. *Development of guidance on how to perform sensitivity and uncertainty analyses should receive a higher priority in the draft plan.*

We agree that it is important to develop guidance on how to perform sensitivity and uncertainty analyses. We note that the draft plan merely identifies ongoing activities and does not create or reprioritize any activities. In briefing the Committee, the staff did not spend much time on the resolution of the technical issues identified in the SRM, but the Office of Nuclear Regulatory Research is actively working on the issues.

In your letter you also wrote that "although the evaluation of technical adequacy will have to rely on the judgment of peer reviewers, we believe that sufficient guidance should be given so that these reviewers will be aware of what the agency expects in the area of technical adequacy." The staff agrees. Besides guidance being developed on bounding, sensitivity, and uncertainty analyses, guidance has and is being developed in other areas. A data handbook was issued last year and a handbook of good Human Reliability Analysis practices is soon to be issued for public review and comment. The staff is determining where additional guidance is needed. The industry, through the Electric Power Research Institute, Nuclear Energy Institute, and the owners' groups, has also initiated activities to develop specific guidance in key technical areas.

5. *The staff should be prepared to develop its own guidance documents if industry consensus standards are not developed in a timely manner to meet the Commission's schedule for achieving Phase 3.*

We agree. Although we prefer to endorse industry consensus standards, we are prepared to develop guidance documents to meet the Commission's schedule for achieving Phase 3.

We thank you for your views and recommendations on this matter. As the staff pursues the tasks described in the plan, it will continue to meet regularly with the ACRS to obtain input on this technical work.

Sincerely,

/RA/

Luis A. Reyes
Executive Director
for Operations

cc: Chairman Diaz
Commissioner McGaffigan
Commissioner Merrifield
SECY

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EDO-002 *See previous concurrence

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