

C. Rowley

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August 12, 2004

Mr. C. Wesley Rowley, Vice President
Nuclear Codes & Standards
The American Society of Mechanical Engineers
Three Park Avenue
New York, NY 10016-5990

Dear Mr. Rowley:

I am responding to your July 12, 2004, letter to Mr. Luis A. Reyes that provided supplemental comments on the U.S. Nuclear Regulatory Commission's (NRC) program to enhance PRA scope and quality. I understand that this letter supplements your March 15, 2004, letter and provides further comments on the staff's draft action plan on the implementation of the phased approach to probabilistic risk assessment (PRA) quality. I appreciate and welcome your committee's comments and its' active participation in the development of these standards.

You noted that applications "that use techniques beyond the scope of existing standards should receive equal NRC attention;" that is, "the absence of an applicable consensus standards should not affect the priority given by the NRC to review risk-informed applications with Phases 1 and 2." The staff acknowledges this concern; and, the action plan no longer assigns an automatic low priority to applications from licensees that use techniques beyond the scope of existing standards. All applications will be subjected to a prioritization process that is to be developed as part of the action plan. Among other issues, this process will take into account the degree to which the application enhances the state-of-practice or state-of-the-art, recognizing that applications support the development of methods and standards.

The second concern you raised addressed the matter of completeness. Specifically, you said (1) that scope should be considered separately from quality, (2) that it is not necessary or desirable to conduct a quantitative PRA for all modes and all scenarios, and (3) that it is unnecessary and inefficient to require a risk assessment tool for every combination of plant operating states for all events. These issues will be addressed during the development of the remaining standards (and the staff endorsement of the standards) and during the development of application-specific guidance documents. As noted in the action plan, the overall staff position is the same as discussed in Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and RG 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," which states that a PRA of sufficient quality to support an application need only have the scope and level of detail sufficient to support that application, but it must always be technically adequate.

The NRC staff agrees with the Nuclear Risk Management Coordinating Committee's (NRMCC's) plans to ensure that your activities are coordinated with the staff's action plan. The staff intends

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to continue to work closely with the NRMCC. If you have any questions, please contact either Mary Drouin, (301) 415-6675, e-mail mxd@nrc.gov, or Michael Tschiltz, (301) 415-3183, e-mail mdt@nrc.gov, of my staff.

Sincerely,

/RA/

Carl J. Paperiello, Director
Office of Nuclear Regulatory Research

cc: J.F. Mallay, ANS

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Carl J. Paperiello, Director
Office of Nuclear Regulatory Research

cc: J.F. Mallay, ANS

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Identical Letter Sent to J.F. Mallay

OFFICIAL RECORD COPY

August 12, 2004

Mr. James F. Mallay, Chair
ANS Standards Board
American Nuclear Society
555 North Kensington Avenue
La Grange Park, IL 60526

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Carl J. Paperiello, Director
Office of Nuclear Regulatory Research

cc: C.W. Rowley, ASME

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Office of Nuclear Regulatory Research

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