From:Brian SmithTo:Harry Felsher; Kevin Morrissey; Melanie Galloway; Sharon Steele; TimothyJohnson1/13/05 3:52PMSubject:Re: LES Revised Topics and Revised NRC Notes

attached is a revised topics of discussion file

>>> Harry Felsher 01/13/05 02:51PM >>> Folks,

Sharon and I have completed the revised topics and revised NRC notes. Both documents are attached.

Thanks, Harry

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Subject:Re: LES Revised Topics and Revised NRC NotesCreation Date:1/13/05 3:52PMFrom:Brian Smith

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Topics of Discussion NRC/LES NCS Meeting on 01/14/05

- Both Standard and Alternate ISA Methods
- 1. <u>Location of Information</u> Both the LES SAR ISA method and LES alternate ISA method for "Safe-By-Design" components need to be added to Chapter 3.0 of the license application (SAR).

• Alternate ISA Method for 'Significant Margin' for NCS

2a. <u>Definition</u>

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Provide a clear definition/criteria of "Significant Margin" for NCS aspects of 'Safe-By-Design' components.

2b. <u>Demonstration</u>

Demonstration of 'significant margin' to meet highly unlikely is needed in the ISA summary. NRC notes that the transport devices, storage arrays, dump trap, trap internals, and bench did not appear to have 'Significant Margin' in the submitted classified information.

• Standard ISA Method

- 3. <u>General IROFS and Definition</u> Explain how the general LES IROFS meet the definition from 10 CFR 70.4, which is a human action or a physical device.
- 4. <u>Frequency Index Numbers for Initiating Events and Failures of IROFS</u> Explain the basis for assignment of frequency index numbers (FINs) better than (-1).
- 5. <u>Sampling as an Administrative IROFS</u> Define/explain what is meant by 'Sampling' and 'Independent Verification of 'Sampling.'
- 6.a <u>Definition of 'Independent Verification'</u> Clarify the definition of "Independent Verification," which is performed after the human action being independently verified has been completed. By definition, this will not prevent an accident.
- 6.b <u>Use of 'Independent Verification'</u> Explain how the use of "Independent Verification" as a separate IROFS allows the index scores to be additive, when this IROFS is not independent of the other IROFS.
- 7. <u>Clarity of Accident Sequences</u> Accident sequences and IROFS need to be clear. Certain accident sequences require interpretation of what the accident sequence and IROFS mean. NRC will provide a table summarizing the LES accident sequences.