

July 26, 2006

MEMORANDUM TO: Beth Wetzel, Acting Chief  
Financial, Policy and Rulemaking Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

FROM: Richard Dudley, Senior Project Manager **/RA/**  
Financial, Policy and Rulemaking Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF PUBLIC MEETING TO DISCUSS RESOLUTION OF  
CERTAIN STAKEHOLDER COMMENTS ON PROPOSED RULE ON  
RISK-INFORMED CHANGES TO LOSS-OF-COOLANT ACCIDENT  
TECHNICAL REQUIREMENTS (10 CFR 50.46a)

On June 28, 2006, the staff conducted a Category 3 public meeting on the proposed rule to add a risk-informed alternative to §50.46 (large-break LOCA redefinition). Approximately 25 people attended, primarily industry and staff. The purpose of the workshop was to discuss ways to resolve stakeholder comments on the following two issues:

- (1) What are appropriate accident mitigation requirements for pipe breaks larger than the TBS?
- (2) What should be required by the risk-informed integrated safety performance (RISP) assessment?

On the mitigation topic, stakeholder discussions seemed to indicate that an acceptable alternative would be to include a requirement in the final rule that licensees establish appropriate, non-voluntary operational controls for equipment used to mitigate breaks larger than the transition break size, commensurate with the risk significance of the equipment.

On the RISP assessment topic, industry stakeholders did not want to develop, submit for prior NRC approval, or implement a RISP process that must be applied to all proposed facility changes. Those stakeholders believed that existing processes, including 10 CFR 50.59, the design control process, and Appendix B to 10 CFR 50, address the defense-in-depth and safety margin requirements without the need for additional controls. The NRC agreed to review the existing processes when determining the need for NRC approval of the RISP process.

Industry stakeholders also expressed concerns over the cumulative risk issue. Several issues were raised: (a) PRA updates are difficult and time consuming; (b) it is difficult to predict what

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the overall change in risk will be from just looking at the individual changes; (c) a continuous, cumulative record will require a "living, daily PRA" which will be impractical to implement; (d) it is not clear how to handle model methodology improvements as opposed to plant changes; (e) it is not clear what a plant would need to do if the periodic risk assessment exceeded the acceptance guidelines. The NRC agreed to consider these comments when determining the final rule requirements for the RISP process.

A list of meeting attendees is provided in Enclosure 1. Presentation slides used by the NRC staff are provided in Enclosure 2.

Enclosures:

- (1) List of Attendees
- (2) NRC presentation slides

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NAME	RDudley	SDinsmore	BWetzel
DATE	07/19/2006	07/25/2006	07/26/2006

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