

August 8, 2007

MEMORANDUM TO: Mark Rubin, Chief
Probabilistic Risk Assessment Licensing Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulations

FROM: Stephen Dinsmore, Senior Reliability and Risk Engineer */RA/*
Probabilistic Risk Assessment Licensing Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulations

SUBJECT: SUMMARY OF THE JULY 17, 2007, CATEGORY 2 PUBLIC MEETING WITH THE NUCLEAR ENERGY INSTITUTE TO DISCUSS THE PROBABILISTIC RISK ASSESSMENT QUALITY EXPECTATION FOR RISK-INFORMED, IN-SERVICE INSPECTION RELIEF REQUESTS AFTER JANUARY 1, 2008.

On July 17, 2007, a Category 2 public meeting was held between the U. S. Nuclear Regulatory Commission (NRC) staff and industry representatives at NRC headquarters. A list of attendees is enclosed. The purpose of this meeting was for the industry representatives to present its plans for satisfying the PRA quality guidelines contained in Revision 1 of Regulatory Guide (RG) 1.200 "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities" (ML07024001) when these guidelines are applied to risk-informed in service inspection (RI-ISI) relief requests after January 1, 2008. NRC Regulatory Issue Summary 2007-06 (ML070650428) on RG 1.200 Implementation stated that the NRC staff will use Revision 1 of RG 1.200 to assess technical adequacy for all risk-informed applications received after December 2007.

The Industry opened the meeting by providing a summary of the current status of RI-ISI in the industry. The industry representative's presentation is provided in its presentation slides in enclosure 2. The summary indicated that about 85 units have received NRC approval to implement RI-ISI programs. These programs are approved only for one, ten-year ASME inspection interval. At the end of that interval, each licensee must resubmit a request for approval to use a RI-ISI program for the next ten-year interval. The summary indicated that approximately 13 units are scheduled to submit resubmit RI-ISI relief requests during 2008.

After the industry summary, the staff discussed how the quality of PRAs supporting past RI-ISI relief requests has been addressed consistent with the guidelines in RG 1.178 (ML032510128) and RG 1.174 (ML023240437). The staff has relied primarily on licensees resolving all issues raised during any staff or industry reviews of the PRA that, if left unresolved, might affect the proposed RI-ISI program. The staff then summarized its expectation on how the implementation of RG 1.200 will affect RI-ISI relief request. In RG 1.200 the NRC endorsed with clarifications, ASME RA-Sb-2005, "Standard for Probabilistic Risk Assessment for Nuclear Power Plant Applications" as one measure of adequate technical adequacy of a PRA to support risk-informed licensing requests.

All licensee have had their PRA peer reviewed using industry criteria. The industry criteria and the criteria in the ASME standard differ. RG 1.200 endorses industry guidance to the licensees to perform a self-assessment of their PRAs against the criteria in the ASME Standard that were not addressed during the earlier industry peer reviews. Implementation of Revision 1 of RG 1.200 would require that each applicant after January 1 2008, complete its self-assessment and resolve all issues raised during the self-assessment that, if left unresolved, might impact the proposed RI-ISI program.

Industry stated that the majority of plants are moving forward with the self assessment required by RG 1.200 but that most licensees would not have completed these self assessment before January 2008. Some licensees might need to submit a RI-ISI relief request before their scheduled completion of the self-assessment and re-scheduling the self assessment could interfere with other PRA related work. Industry proposed that they develop a list of self-assessment elements that need to be addressed before a RI-ISI program is developed. Using this list, the licensee could limit their self assessment to include only those elements that need to be completed before a RI-ISI program is developed and submitted. The staff agreed that the guidance on PRA quality permits focusing only on PRA quality elements important to a particular submittal and that such a list should be possible for RI-ISI.

The staff and industry agreed to work toward developing a list of necessary and sufficient self-assessment elements that should be addressed before submitting a RI-ISI relief request. The staff agreed to provide NEI with the accession numbers of past RI-ISI submittals that discussed the ASME standard elements in detail to provide a starting point for the list of important self-assessment elements. NEI will propose several industry representatives for a working group in a letter to the NRC in early September 2007, and the staff will provide one or two members. The NRC staff will also investigate how a list of elements could be evaluated and, if successful, endorsed by the NRC.

Members of the public were in attendance. No public meeting feedback forms were received.

Enclosures:

1. List of Attendees
2. Industry Handout

cc w/encl: See next page

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List of Attendees for July 17, 2007

| Name | Organization |
|------------------|----------------------------|
| Amir Afzali | PG&E |
| Biff Bradley | NEI |
| Brian Brogan | Entergy |
| Donald Chung | NRC |
| Stephen Dinsmore | NRC |
| Steven Dolly | Inside NRC/Platts |
| Paul Farish | Duke Energy |
| David Grabski | First Energy |
| Danny Johnson | NEI |
| Andrea Keim | NRC |
| Patrick O'Regan | EPRI |
| James Pak | Dominion |
| Gareth Parry | NRC |
| Deepak Rao | Entergy |
| James Ritter | Nuclear Management Company |
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