

Preliminary Thoughts on Credit for B.5.b Actions

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Questions have been asked
“Can B.5.b Implementation be credited in Regulatory Activities?”

- Staff is currently considering this question
- A Regulatory Information Summary (RIS) may be issued on this topic
- It will address under what conditions security compensatory measures may be “credited”

- This effort is still under development and these are some early draft concepts

Security compensatory measures often involve use of non-safety, portable, manual control, offsite or non-standard system alignments to provide enhanced mitigation capability.

- The staff believes that the best focus for crediting such capabilities rests in “risk informed” actions.

Risk informed licensing actions

SDP assessments

Would generally not be credited in design basis issues

To credit security enhancements:

- Mitigation strategy should be modeled in both baseline PRA and change proposed or SDP assessment
- PRA implementation should comply with ASME PRA Standard as endorsed by RG 1.200
- Manual actions, special equipment operation, or other non-standard actions must be trained upon and able to be performed in order to be incorporated into risk model
- Any modeling of "off site" resources must be demonstrated as feasible and its availability justified.

Until staff position is finalized, we will consider credit on a case by case basis, dependent upon the merits of the associated justification