NRCREP Resource

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To: NRCREP Resource
Subject: Progress Energy Comments on DG-1200
Attachments: 08-064 McCabe-NRC Letter- Comments on DG-1200 PRA Adequacy.pdf

Progress Energy is submitting the attached comments on DG-1200 "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities" (73FR35170)

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E-RIDS = ADM-03
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Rulemaking, Directives, and Editing Branch
Office of Administration
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Comments on Draft Regulatory Guide DG-1200 "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities" 73FR35170 (June 20, 2008) and 73FR49711 (August 22, 2008)

The NRC has issued for public comment the subject draft Regulatory Guide. Progress Energy is pleased to submit comments on the proposed revision to Regulatory Guide 1.200. We also endorse the comments provided by the Nuclear Energy Institute (NEI) in their letter dated August 20, 2008.

We believe that significant issues remain to be resolved with Probabilistic Risk Assessment (PRA) standards addressed in the appendices and with the regulatory implications suggested in the body of the draft Regulatory Guide. We believe the Regulatory Guide should not be issued for use until further progress is made in addressing the issues outlined below as well as the issues identified by NEI. The body of this letter provides high level regulatory comments on the draft Regulatory Guide. Specific comments on the Regulatory Guide and its Appendices are provided in the enclosure.

1. This Regulatory Guide draft changes the applicability from risk "applications" to risk "activities". The term "risk activities" lacks clarity and is open to interpretation.
2. The phrases "impacts risk significant" and "no significant impact" are used and are not defined.
3. The new definition of "Significant change in risk insight" is added. This definition is not clear and the application of this definition is not practical, especially applying it to various "risk activities" versus "risk applications" as discussed above.

Please contact me at (919) 546-4579 if you have any questions.

Sincerely,

Brian C. McCabe

Brian McCabe
Manager - Regulatory Affairs

KMH

Enclosure

#	Page	Section	Comment
1	11	1.2.1 Quantification section	Need clarification as to the intent of the discussion on truncation limit being based upon each accident sequence not changing. If you have a single top model, it should be based on CDF not changing. Also, for BWR models that usually have numerous accident sequences, this would be time consuming. You may be spending time on accident sequences that do not contribute to the CDF. Section 1.2.1 (truncation based upon accident sequence) and Table 2-9 (truncation based upon total CDF) under quantification don't match. The truncation limit should be based upon application and total CDF.
2	15	1.2.6 Interpretation of Results	How is the level of detail associated with each hazard group to be defined or categorized so that it will be useful in interpreting the results?
3	16	1.2.6 Interpretation of Results	Need more clarification on significant contributions to uncertainty regarding how to define, recognize, and document the uncertainty for each hazard group.
4	19	Table 2 POS	The duration of each Plant Operating State (POS) will be difficult to determine other than "at power". Suggest using an estimate for duration in any POS other than "at power."
5	19	Table 2 Initiating Events	The temporary alignments term needs a definition of what is considered a temporary alignment. This requirement seems to be blurring the line between using the PSA for 10 CFR 50.65 (a)(4) applications and the baseline PRA. The temporary system alignments are open ended and cannot be predicted.
6	19	Table 2 IE Analysis	Same as comment number 5 on temporary system alignments causing an IE.
7	A-8	Table A-1 Initiating Event	Need to qualify which operator actions are an initiating event. Recommend that the operator actions discussion be revised to indicate that HFE are a source for IE. However, these HFE are not required to be quantified separately because the operator/maintenance actions that would cause a plant trip/ transient would be grouped with the IE that corresponds to the plant response. Each group of IEs would include the HFE contribution as determined by plant experience.
8	A-9	Table A-1 PRA Upgrade	Most changes impact the significant sequences in some way. Need to define how much of an impact is deemed necessary for an upgrade.

9	A-9	Table A-1 section 1-3.1, Stage A	The previous revision stated that "Different portions .... May be irrelevant." Why is this still not true?
10	A-11	Table A-3 .1-4.3.3, 2nd paragraph	The change now requires use of "outside experts" versus using "experts." Why are outside experts now required?
11	A-14	Table A-1 - global	The term "significant change in risk insights" is used here. If the RAW changes from 1.9 to 2.1, is that a significant change? This requirement is not clear and needs examples.
12	A-16	Table A-1, Ex 18	The NRC discusses "new methodology" as something that could result in a change to success criteria and potentially HRA timing. In almost all cases, a change in the thermal hydraulic code revision will have some impact on HRA timing. Example is going from MAAP 3b to 4.0.5. Is it the NRC's position that a change from MAAP 3b to 4.0.5 or from 4.0.5 to 4.0.6 requires a Peer Review of the HRA results and MAAP results?
13	A-16	Table A-1 .1-A.3, EX. 23	It appears to imply that new HRAs or HRA revisions due to procedure changes are an "upgrade" that would require a focused peer review. Is that the intent?
14	A-17	Table A-2 IE-A4a	This revision removed the word "routine." There is a need for "alignments" to be defined or only require consideration of "routine alignments". This change opens up the ability to meet Capability Category II to the interpretation of the review as to what preventive and corrective maintenance need to be considered. How would you know if you have gotten all possible alignments due to maintenance for the plant? If an event occurred due to some alignment, the event would be categorize based upon criteria given in IE-B3
15	A-22	Table A-2 HR-D3	Change the word "including" to "e.g.," as in the two other places. The list of quality examples in operation procedures should not become a requirement for the documentation in the PRA.
16	A-52	Table A-4 WIND-A1	This requirement for Cat II seems to beyond what is acceptable for other external events in what is required for level of effort and technical capabilities. Cat II requirements do not require this level of expertise or detailed computer codes.
17	A-28	IF-C3b	Added a requirement of consider impact of maintenance on flood barriers. This is required to be evaluated as part of 10CFR50.65(a)(4). Including this requirement here is duplication.
18	A-40	FSS-B2	Typo in CAT II "remoter"

19	A-41	FSS-D3	CAT II removes the allowance for "bounded" unscreened physical analysis units. It is changed to require "accurately characterized" fire risk contributions no matter what the risk significance of the physical analysis unit. With plants having some 4000 or more fire sources, the elimination of use of bounding for some physical analysis areas is a significant increase in burden with no increase in insights. This also means that there is actually no difference between CAT III and CAT II, since in each case the accurate characterization for all areas means that the risk for all specific ignition sources has to be done in either CAT II or CAT III.
20	A-42	FSS-F1	"Typo Cat II and II"
21	A-48	Section 4-1.1	This section of the ASME standard should not be endorsed by the NRC until a pilot effort is completed to demonstrate the ability to meet the requirements, with the existing state of knowledge and available tools and resources. Currently the most technologically advanced SPRA cannot meet the requirements.