

MEMORANDUM

TO: R. P. Savio
FROM: J. N. Sorensen *JNS*
DATE: November 24, 1998
SUBJECT: PRA Steering Committee Meeting with NEI

I attended a meeting between the NRC's Steering Committee on Risk Informed Activities and NEI on November 16, 1993, at the NEI offices in Washington. One of the early action items for the NRC steering committee was to request the industry to set up a similar committee to facilitate information exchange. The November 16 meeting was the first in what is expected to be periodic meetings on the general topic of risk informed activities at the NRC and within the licensee community represented by NEI. A copy of the agenda (Proposed Topics for Discussion) is attached. A list of participants is included at the end of this memo.

Gary Holahan described how the NRC handled the Arkansas Nuclear One request for exemption on hydrogen sampling time following a safety injection actuation. In this case, the staff issued an order allowing the licensee to establish a new sampling time, changing it from 30 minutes to 90 minutes. He indicated that the staff was looking for a way to provide this particular exemption to a large number of other licensees without having to process an order or license amendment for each plant. One possibility might be to issue a single order with multiple docket numbers for all plants interested in the same change.

Mr. Holahan indicated that one problem area in implementing risk informed decision making has been the integration of PRA and traditional deterministic considerations. It was this issue that led to the formation of the Risk Informed Licensing Panel, with Mr. Holahan as Chairman and Tom King as Vice-Chairman. (ACRS members will recall that "Integrated Decisionmaking" is the center piece of the risk informed philosophy described in Regulatory Guide 1.174.)

Tony Pietrangelo stated that NEI was looking at its internal structure to determine if they needed to create a new group to interface with the NRC's Steering Committee on Risk Informed Activities. One possibility is to make the link between the NRC steering committee and an existing regulatory affairs working group under Harold Ray of Southern California Edison. Another possibility was to use

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the group of NEI people present at the November 16 meeting (Ralph Beedle, Tony Pietrangelo, and Steve Floyd.)

There was a brief discussion of the changes to the maintenance rule that are currently in process. Mr. Pietrangelo indicated that the industry feels strongly that the final changes must include a definition of the term "risk significant configuration." The term appears in the proposed changes, but has not been defined.

NEI and the industry still plan to proceed with the so-called "whole plant studies," and would like to use them as test cases for the definition of "important to safety." Steve Floyd stated that NEI would like to include a BWR in the pilots. Ashok Thadani responded that using three PWRs with large dry containments did not seem like the best use of NRC resources.

There was extensive discussion of the ASME standard on PRA quality that is now under development. NEI expressed some concern that the standard might contain too many requirements. Gary Holahan commented that the NRC's view of what the standard might be was reflected in Regulatory Guide 1.174.

NEI reiterated its interest in using the maintenance rule as a "test bed" for changing the scope of Part 50 through definition changes. Mr Holahan argued for a broader change than just the maintenance rule. NEI made the point that licensees want to achieve one set of rules for what is within the scope of the regulations, and not have different screening criteria for the maintenance rule, Appendix B, etc.

Tom King summarized the staff's effort to develop the options paper on making Part 50 risk informed using the same slides he used at the November 9 steering committee meeting (see my memo JNS-98-32, November 10, 1998). He indicated that the key issues appeared to be:

- mandatory vs voluntary implementation
- need for exemptions for pilot plants
- need for NRC to pre-approve individual plant changes
- should proposed rule changes embrace design as well as operations

The meeting concluded with a tentative agreement for NEI and the NRC steering committee to meet at least quarterly.

c: ACRS Members
ACRS Staff & Fellows

Attachments

Proposed Topics for Discussion, 11/16/98
List of Steering Committee Members

Meeting Participants:

NRC

Ashok Thadani, RES
Elizabeth Ten Eyck, NMSS
Luis Reyes, Region II
Margaret Federline, RES
Gary Holahan, NRR
Ernie Rossi, AEOD
Tom King, RES
Joe Gray, OGC
Jim Lieberman, OE
Jack Sorensen, ACRS

NEI

Ralph Beedle
Steve Floyd
Tony Pietrangelo
Biff Bradley

Proposed Topics for Discussion
between
NRC and Industry Risk-Informed Steering Committees
(11/16/98 - 3-5 PM - NEI HQ)

- Steering Committee Charters NRC/NEI
- Ongoing risk-informed pilot activities: NRC
 - status
 - problem areas
- Potential new risk-informed pilot activities: Industry
 - topic
 - schedule
 - priority
- PRA Quality: NRC/NEI
 - ASME standard - status
 - Owner's Group Certification - status
- Risk-informed Part 50 rulemaking: NRC
 - current plan and schedule
 - objectives
 - relationship to NEI Whole Plant Study
 - key issues

Steering Committee Membership

Ashok Thadani, Director, RES - Chairman

Sam Collins, Director, NRR

Jim Lieberman, Director, OE

Mal Knapp, Deputy Director, NMSS

Tim Martin, Director, AEOD

Luis Reyes, Regional Admin - Reg. II

Joe Gray, OGC

Distribution for JNS-98-34

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Cronenberg, August W.