

NRCREP Resource

From: Doug True [detrue@erineng.com]
Sent: Wednesday, October 01, 2008 6:38 PM
To: NRCREP Resource
Cc: Mary Drouin; Gareth Parry
Subject: Comment on DG-1200

6/20/08
73 FR 35170 (7)

DG-1200 provides the NRC's expectations for the technical adequacy of PRAs used in risk-informed applications. An essential part of the technical adequacy is conformance with PRA Standards.

From an end user perspective, it would be beneficial to clarify how the Capability Categories in the PRA Standards fit into the technical adequacy requirements of DG-1200. Since the utility gap analyses performed against NEI 00-02 and peer reviews performed using NEI 05-04 are targeted on meeting Capability Category II, it seems useful to make it clear in RG 1.200 that CC-II is effectively the default level of technical adequacy. Right now, it is sort of implicit, but I think it would help if it could be made more explicit. That way, when licensees submit applications, it will be clear that they should provide justifications for any SRs where CC-II is not met. I know in 50.69 (NEI 00-04), we explicitly stated that CC-II was required, but it might be helpful to make that clear in RG 1.200 in a more general sense.

Thank you for considering this comment.

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