

Industry Perspective on ISAs

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Industry Experience to Date

- Consequence Evaluations
 - Added rigor for Radiological, Chemical, and Fire Safety and a process to focus only on potential accidents that are safety significant
 - Added requirements for Criticality Safety without a significant change noted in the sets of controls already in use prior to issuance of new Part 70
- Risk Assessments
 - Clearer presentation of information can help licensees make decisions during Reportability evaluations
 - Can also reveal ambiguities if accident scenarios and control sets are not clearly defined



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Industry Experience to Date

- IROFS
 - Design criteria and setpoints are more clearly defined and better documented
- 70.72 Process
 - Formalized ability for licensees to evaluate facility and safety program changes to determine if NRC approval is required
- License Applications
 - Now include general overview of Safety and Management Measures programs
 - Moved detailed process descriptions and accident analyses to ISA improving the ability of licensees to maintain this information in living documents

Current Challenges

- Double Contingency vs. 70.61 Performance Requirements
 - Some difficulty encountered in how to balance/address the two sets of requirements
 - Consideration should be given to migrating to one set of requirements rather than two, i.e. one set should bound the other
 - One method is to develop Double Contingency controls, and then identify each control as either an IROFS or a Management Measure



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Current Challenges

- Reporting requirements
 - Implementation ambiguities identified
 - Petition for Rulemaking has been submitted based on products from NRC/Industry Working Group
- 70.72 process
 - Implementation ambiguities identified
 - NRC/Industry Working Group product will be issued soon for public comment in the form of a guidance document
- Design Features and other Creditable Controls vs. IROFS



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Future Challenges

- Risk Informing the Fuel Cycle Oversight Process
 - Use of ISA information during implementation of FCOP may reveal other ambiguities that need to be addressed
- Clarifying the jurisdiction of chemical safety oversight – NRC vs. OSHA
- Concurrent Reporting & Discovery of IROFS Failures during Functional Testing
 - Existing guidance available to Part 50 licensees in NUREG-1022 should be considered for adoption for use by Part 70 licensees
- Updates needed to risk inform NRC Inspection Manual and Procedures to reflect ISAs
- Identify other sections of Part 70 that need to be risk informed (i.e., 70.24)

Recommendation

- NRC/Industry Working Group process or a similar forum should be renewed to continue working through implementation issues
- NRC should endorse this process and give it sufficient priority so that issues are resolved in a timely fashion, but not to the extent that impedes pending Licensing actions



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