

November 8, 2010

MEMORANDUM TO: Gary DeMoss, Branch Chief
Performance and Reliability Branch
Division of Risk Analysis
Office of Nuclear Regulatory Research

FROM: Anders Gilbertson, Project Manager */RA/*
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SUBJECT: PUBLIC MEETING REGARDING RISK-INFORMED ACTIVITIES

On October 19, 2010, the Nuclear Regulatory Commission (NRC) staff met with the Pressurized Water Reactor Owners Group (PWROG), the Boiling Water Reactor Owners Group (BWROG), ASME, American Nuclear Society (ANS), the Electric Power Research Institute (EPRI), Nuclear Energy Institute (NEI), various licensee's, consultants, and other members of the public at NRC headquarters to talk about the current status of and path forward for the NRC's risk-informed activities. The meeting announcement was issued on October 5, 2010 and posted on the NRC's external web page (ADAMS Accession Nos. ML102720921 and ML102720933).

The purpose of the meeting was to provide (1) the status of staff's (Office of Nuclear Reactor Regulation (NRR), Office of New Reactors (NRO), Office of Regulatory Research (RES)) risk-informed activities and associated issues and (2) to understand stakeholders' concerns and their efforts regarding risk-informed activities.

Status of NRC Risk-Informed Activities

Office of Regulatory Research – RES staff presented status updates on the following topics: Phased Approach Plan; Standards and Review Guidance; Technical Programs; Risk-Informed Activity needs. The technical programs update included discussion of uncertainties, internal fires, human reliability analysis, and digital I&C.

Major points discussed:

- General agreement from participants that (1) changes in Addendum B to ASME/ANS PRA standard are not substantive and (2) no need for NRC to endorse Addendum B. Several participants raised the question that ASME should reconsider the need to issue/publish Addendum B at this time.

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- Some participants not in agreement with NRC position that the infrastructure on Internal Fire PRA is adequate to move forward with risk-informed activities.
- NEI would like to have a separate meeting to discuss NRC concerns on Revision 1 to NEI 07-12 (Peer Review Guidance for an Internal Fire PRA). RES to follow-up.
- Participants in agreement for the need for document that indicates for the various risk-informed activities, what is needed (e.g., PRA scope, significant technical issues, significant areas of uncertainty, gaps in technical guidance, etc.). Participant indicated that this effort was needed in order to achieve stability and to support future risk-informed applications. Suggested that ISI would serve as a good pilot in establishing the scope of the effort. Agreement between NRC and participants that NRC should work closely together. EPRI with Owner's Groups indicated interest in some type of collaboration under the NRC/EPRI memorandum of understanding (MOU). RES to follow-up.

Office of Nuclear Reactor Regulation – NRR staff presented status updates on the following topics: Risk-Informed Technical Specifications Initiative 5B and 4B, Surveillance frequencies and Flexible allowed outage times; 10 CFR 50.48(c) activities involving the National Fire Protection Association's Standard, NPFA-805; 10 CFR 50.69 activities involving the risk-informed categorization of structures, systems, and components.

Major points discussed:

- 50.69, questions raised regarding the basis of the inspection guidance. Participants indicated that the lack of guidance is a major issue and that the guidance is needed to for NRC process to achieve stability. Participants noted that they would like to have further discussion to determine the level of consistency between NRC and industry guidance. NRR to follow-up.
- NRR indicated that 50.69 applications/pilots good possibility for fee waiver.

Office of New Reactors – NRO staff presented status updates on the following topics: Probabilistic Risk Assessment (PRA) technical adequacy; PRA standards and guidance for new reactors; risk-informed activities for new reactors; risk-informed regulatory guidance; issues with screening criteria for new reactors; issues associated with the implementation of the Risk-Informed Technical Specification Initiative 4B for new reactors; and advanced reactor issues.

Major points discussed:

- New plant applications interested in 50.69.
- Acceptable screening criteria; NRC believes PRA community needs to address this issue and propose resolutions; part of topics to be discussed at Nov 3, 2010 public meeting.
- Issues raised under RITS Initiative 4B (e.g., methodology) relevant to other activities.

Industry Participation

Representatives from EPRI, PWROG, BWROG, NEI, ASME, and ANS presented the industry's perspective on the current and future use of risk-informed activities as well as research efforts and other activities aimed at improving the use of risk-informed activities.

Major points discussed:

- EPRI noted their belief that there are still significant conservatisms with the internal fire PRA methodology and more work is needed and that seismic PRA methodology also needs additional work.
- PWR OGs indicated that a pilot on low-power shut down (LPSD) to support 50.69 would be desirable.
- BWR OGs discussed a fire database under development which is intended to be tool to support peer reviews and risk-informed applications.
- BWR OGs noted their support to NRC effort on developing document on risk-informed activities needs; and indicated they plan on a workshop on this subject in mid 2011 and would like NRC participation.
- BWR OGs noted that 805 applications have the highest priority for peer reviews.
- BWR OGs noted that there is perception that the required pedigree of PRA is increasing.
- Exelon noted that their priorities tend to be on activities that do not cross utility disciplines; e.g., 50.69 receives lower priority.
- NEI noted that current highest priority is Fire PRA methodology.
- NEI noted that NRC is drifting to place too much reliance on risk analysis and not balancing with other elements such as defense-in-depth.
- Discussion on the importance of the new subcommittee entitled Planning, Interface, Implementation and Interpretations as part of the new ASME/ANS Joint Committee on Nuclear Risk Management.
- Several participants raised to ASME the need to publish Addendum B at this time, and that ASME should perhaps reconsider.

The NRC concluded the meeting indicating that the NRC will continue to hold meetings with industry and the public as often as needed to continue to promote open communication on the status of risk-informed activities and the use of such activities by the industry.

Enclosure: 1. Presentation Handouts (ADAMS Accession No. ML102980110)

LIST OF ATTENDEES

MEETING REGARDING RISK-INFORMED ACTIVITIES
TUESDAY, OCTOBER 19, 2010

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DCIP = Division of Construction, Inspection, and Operational Programs

DRA = Division of Risk Analysis/Assessment

DSRA = Division of Safety Systems and Risk Assessment

NRR = Office of Nuclear Reactor Regulation

NRO = Office of New Reactors

RES = Office of Nuclear Reactor Research

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ADAMS Accession Number: ML103090299

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NAME	AGilbertson	AGilbertson
DATE	11/8/10	11/8/10

OFFICIAL AGENCY RECORD