December 2, 2010

MEMORANDUM TO: Marissa G. Bailey, Deputy Director
Special Projects and Technical
Support Directorate
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

THRU: Patricia Silva, Chief **/RA/**
Technical Support Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

FROM: Soly I. Soto, Chemical Engineer **/RA/**
Mixed Oxide and Uranium
Deconversion Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF THE MEETING WITH INDUSTRY ON THE U.S. NUCLEAR REGULATORY COMMISSION'S DRAFT PAPER COMPARING INTEGRATED SAFETY ANALYSES FOR FUEL CYCLE FACILITIES AND PROBABILISTIC RISK ASSESSMENT FOR REACTORS

On November 5, 2010, the U.S. Nuclear Regulatory Commission (NRC) staff met with representatives from Nuclear Energy Institute and industry, to discuss the NRC's draft paper comparing Integrated Safety Analysis for fuel cycle facilities and Probabilistic Risk Assessment for reactors.

Please see the enclosed meeting summary for more details (Enclosure 1). The meeting attendance list is also enclosed (Enclosure 2). The attachments do not contain any official use only material.

Enclosures:
As stated

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SUMMARY OF THE MEETING WITH INDUSTRY ON THE U.S. NUCLEAR REGULATORY COMMISSION'S DRAFT PAPER COMPARING INTEGRATED SAFETY ANALYSES FOR FUEL CYCLE FACILITIES AND PROBABILISTIC RISK ASSESSMENT FOR REACTORS

DATE November 5, 2010

PLACE Atlanta, Georgia

ATTENDEES See Enclosure 2

PURPOSE

The purpose of this meeting was to discuss the U.S. Nuclear Regulatory Commission (NRC's) draft paper comparing Integrated Safety Analysis (ISA) for fuel cycle facilities and Probabilistic Risk Assessment (PRA) for reactors and obtain stakeholders insights and feedback.

DISCUSSION

The NRC staff presented an overview of the draft paper comparing ISAs and PRAs.

Industry proposed that the ISA-PRA paper separate the tasks mandated by the Staff Requirements Memoranda (SRMs) as:

1) an ISA-PRA comparison in the context of compliance and safety
2) the use of ISA and/or PRA in a Significance Determination Process (SDP)

Industry representatives also commented that although there were no technical mistakes in the paper, some statements could give a false impression that ISAs were deficient with respect to achieving acceptable safety. In other words, the paper does not strongly make the point that the existing ISAs provide adequate safety.

As requested by NRC staff, several comments were made on Section V Table 3 on grounds similar to the previous comment. Specifically, statements regarding the possibility of incorrect evaluation often apply to both PRA and ISA.

There was also a discussion of the differences in risk between fuel facility processes and nuclear reactors.

A comment was made that the section on SDP for the fuel cycle oversight process should mention methods other than quantitative for significance determination, especially in non-ISA areas.

The NRC staff requested that any comments on this paper be provided by November 19, 2010. Nuclear Energy Institute committed to submit a letter to the NRC before this date. The ISA/PRA comparison paper will be submitted to the Advisory Committee on Reactor Safeguards by December 15, 2010.

No regulatory decisions were made at the meeting.

The meeting was then adjourned.

**Meeting Attendees**
**November 5, 2010, ISA/PRA Draft Paper Discussion with Industry**

| | |
|---|---|
| Dennis Damon | U.S. Nuclear Regulatory Commission (NRC) |
| Marissa Bailey | NRC |
| Patricia Silva | NRC |
| Soly I. Soto | NRC |
| Christian Fisher | NRC |
| Mark A. Wolf | Honeywell |
| Jennifer Wheeler | NFS |
| Al Kennedy | GNF-A |
| Jim Kay | AREVA (AES) |
| Larry Parscale | Honeywell |
| Dealis Gwyn | MOX Services |
| William Gloersen | NRC |
| Janet Schlueter | Nuclear Energy Institute (NEI) |
| Victor McCree | NRC |
| Michael Greeno | Honeywell |
| Nicole Coovert | NRC |
| Brian Wagner | NRC |
| Phill Reed | NRC |
| Chris Tripp | NRC |
| Larry Campbell | NRC |
| Dennis Hankle | GE-Hitachi |
| Steven Badder | AREVA |
| Kevin Morrissey | NRC |
| David Tiktinsky | NRC |
| Robert Link | AREVA |
| Doug Yates | MOX Services |
| Gerard Couture | Westinghouse |
| Dallas Gardner | Honeywell |
| Scott Murray | Global Nuclear Fuel |
| Chad Cramer | NRC |
| Tony Gody | NRC |
| Christopher Ryder | NRC |
| Jeannette Arce | NRC |
| James Hammelman | NRC |
| Cinthya Roman | NRC |
| Felix E. Gonzalez | NRC |
| Wendy Reed | NRC |
| Brian Smith | NRC |