

March 3, 2011

Dr. Said Abdel-Khalik, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: RESPONSE TO THE ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
LETTER DATED JANUARY 24, 2011, ON DRAFT FINAL REVISION 2 TO
REGULATORY GUIDE 1.174 AND REVISION 1 TO REGULATORY GUIDE 1.177

Dear Dr. Abdel-Khalik:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated January 24, 2011, regarding recommendations of the Advisory Committee on Reactor Safeguards (ACRS) on the Draft Final Revision 2 of Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis" and Draft Final Revision 1 of RG 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." The NRC staff agrees with the recommendations in your letter as discussed below.

ACRS Recommendation 1

Revision 1 to RG 1.177 should be issued as final. Revision 2 to RG 1.174 should be revised as described in Recommendation 2 before being issued as final.

NRC Response

The NRC staff agrees.

ACRS Recommendation 2

The staff should reinstate guidance on the consideration of late containment failure in RG 1.174 (i.e., as part of the assessment of impacts on defense-in-depth, licensees should include an assessment of the potential for an increase in the likelihood of late containment failure). This assessment can be qualitative.

NRC Response

The NRC staff will reinstate guidance on impacts not captured by core damage frequency and large early release frequency as recommended by the Committee. The staff believes that risk impacts such as late containment failure that are potentially not captured directly by these metrics are sufficiently addressed in the existing discussion of defense-in-depth and safety margins in the revised RG (and the previously issued versions of the RG). Although the guidance on late containment failure was originally included in the draft revision to RG 1.174, the staff removed the guidance based on commenter concerns that the new paragraph could introduce unnecessary confusion. However, the staff also agrees with the ACRS's perspective

that reinforcing the issue by including additional guidance provides greater benefit in that it further reduces the likelihood that such an issue could go unidentified in a licensee submittal.

ACRS Recommendation 3

The staff should continue to investigate approaches for addressing the interfaces between measures taken for safety and measures taken for security and to identify revisions and adaptations that might be required for new reactors.

NRC Response

The NRC staff agrees. Previous staff efforts in this regard have included issuance of RG 5.74, "Managing the Safety/Security Interface," dated June 2009 and SECY-10-0121, "Modifying the Risk-Informed Regulatory Guidance for New Reactors," dated September 14, 2010. The staff will continue to investigate these issues.

Finally, the NRC staff will also address the issue raised by the Committee in the "Discussion" section of the subject letter related to the citation of the PRA standard.

The NRC staff and I appreciate the comments and recommendations provided by ACRS. We look forward to continuing to work with the Committee as the staff evaluates future updates to its risk-informed guidance.

Sincerely,

/RA Michael Weber for/

R. W. Borchardt
Executive Director
for Operations

cc: Chairman Jaczko
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
SECY

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