



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, DC 20555 - 0001**

April 19, 2011

Mr. R. W. Borchardt  
Executive Director for Operations  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555 - 0001

**SUBJECT: RESPONSE TO THE MARCH 22, 2011, EDO LETTER REGARDING  
COMPARISON OF INTEGRATED SAFETY ANALYSIS AND PROBABILISTIC  
RISK ASSESSMENT FOR FUEL CYCLE FACILITIES**

Dear Mr. Borchardt:

In our February 17, 2011, letter regarding the staff's comparison of Integrated Safety Analysis (ISA) and Probabilistic Risk Assessment (PRA) for fuel cycle facilities (FCFs), we concluded that for more complex facilities, especially those with the potential for large radiological exposure or releases, the use of a PRA approach is advantageous because it provides a basis for prioritization of safety systems and maintenance activities. Additionally, we recommended that the staff continue to develop and test the use of focused PRA-like analyses to help assess the risk significance of inspection findings for FCFs. We indicated that we looked forward to additional discussions with the staff on the development and use of cornerstones for the Fuel Cycle Oversight Process, as well as the choice of analytic methods for their implementation.

In your March 22, 2011, response you stated that pursuing PRA-like risk significance determination is a subject that the staff will address in a paper to the Commission in late July 2011, along with other topics related to risk-informing the Fuel Cycle Oversight Process. Recommendations will also be provided to the Commission in July 2011. In closing your letter, you stated that the "NRC staff hopes to present this broader subject to the Committee at an appropriate time after the recommendations have been submitted to the Commission." We would like an opportunity to review the paper's associated findings, conclusions, and recommendations, prior to its transmission to the Commission.

Sincerely,

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Said Abdel-Khalik  
Chairman

References:

1. Letter to Said Abdel-Khalik, Response to the ACRS Letter on the Comparison of Integrated Safety Analysis and Probabilistic Risk Assessment for Fuel Cycle Facilities, 03/22/2011 (ML110680029)
2. Letter to Gregory B. Jaczko, Comparison of Integrated Safety Analysis and Probabilistic Risk Assessment for Fuel Cycle Facilities, 02/17/2011 (ML110460328)
3. Staff Requirements Memorandum (SRM) SECY-10-0031, "Revising the Fuel Cycle Oversight Process," 08/04/2010 (ML102170054)
4. Staff Requirements Memorandum (SRM) M100429, "Briefing on the Fuel Cycle Oversight Process Revisions," 05/12/2010 (ML101320075)

References:

1. Letter to Said Abdel-Khalik, Response to the ACRS Letter on the Comparison of Integrated Safety Analysis and Probabilistic Risk Assessment for Fuel Cycle Facilities, 03/22/2011 (ML110680029)
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