

Transition of Non-Pilot Licensees to NFPA 805

NRC Public Meeting
April 14, 2011



NUCLEAR
ENERGY
INSTITUTE

Purpose

- Discuss sequenced approach to LAR submittals
- Provide industry considerations that factored into sequencing
- Provide projected results and need for implementing sequenced approach
- Provide suggestions on LAR review approach and adjustment to monthly status meetings to support reviews

Sequenced NFPA 805 Application

- Current non-pilot plant submittals
 - 23 LARs (33 units) by June 29, 2011
 - LIC 109 reviews extended to 60 days
 - Pilot reviews took over 2 years when originally estimated for only 6 months
 - Review and SE issuance for 23 submittals will require multiple review teams to support a 2 year review timeframe
 - “...the staff and the industry have underestimated the complexity and resources necessary to address the technical issues associated with review and approval of LARs for use of NFPA 805.”

Sequenced NFPA 805 Application

- Impact of current submittal approach
 - Opportunity lost to apply lessons learned or improvements in FPRA methodology
 - Multiple review teams will result in inconsistent reviews
 - Review period beyond 2 years places undue burden on licensees
 - Risk of losing knowledgeable support
 - Additional significant financial cost

Sequenced NFPA 805 Application

- Introduction of staggered approach
 - NEI letters to NRC recommending staggered approach to LAR submittals
 - February 2, 2007
 - March 7, 2008
 - November 15, 2010
 - ACRS Letter issued February 17, 2011
 - SECY 11-0033 issued March 4, 2011

Sequenced NFPA 805 Application

- Benefits of sequenced submittals
 - Allow application of any improvements developed in the FPRA methodology
 - Incorporate lessons learned
 - Pilot information
 - Fleet information
 - RAIs from early submittals
 - More consistent reviews by limiting the number of required review teams
 - Stable, predictable and efficient transition

Industry Considerations for Sequencing

- Management of fleet stations
 - Internal resource utilization
 - Incorporation of lessons learned
 - Program consistency
- Station designs
- Fire PRA
 - Status
 - Approach
 - Peer Review

Industry Considerations for Sequencing

- Fire PRA methodology improvements
- Other significant licensee applications
 - License Renewal
 - Risk informed applications
 - EPU
- Outage and modification schedules
- Industry and vendor resources
- License Commitments
- FAQ closure

Projected Industry Submittals under Sequenced Approach

- Fiscal Year 2011 – 7 to 9
- Fiscal Year 2012 – 10 to 12
- Fiscal Year 2013 – 9 to 11

Enforcement Policy Revision

- SECY-11-0033 recommends staggered submittals and reviews of LARs
- Staff to submit policy paper recommending changes to Enforcement Policy
- Enforcement policy revision required now to preclude expending industry and staff resources on applications

LAR Review Approach

- Process reviewed and approved (NEI 04-02, FAQs, SE and LAR templates)
- Suggest NRC review teams organized by subject matter experts/LAR sections
- Maximize use of electronic audit site
- Sample review of items where licensee state compliance with NFPA 805 without conditions
- Industry will provide a matrix of sections requesting specific approval

Monthly Status Meetings

- Adjust monthly FAQ public meeting
 - High level status of LAR reviews
 - RAIs with generic applications
 - Need for new FAQs
- Benefits
 - Timely recognition and response to generic issues
 - Maintain consistency in reviews and responses