July 6, 2011

Mr. Oliver Martinez
ASME
3 Park Ave
New York, NY 10016

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION (NRC) COMMENTS ON "ADDENDA TO A CURRENT ANS: ASME RA-SB - 20XX, STANDARD FOR LEVEL 1/LARGE EARLY RELEASE FREQUENCY PROBABILISTIC RISK ASSESSMENT FOR NUCLEAR POWER PLANT APPLICATIONS"

Dear Mr. Martinez:

The U.S. Nuclear Regulatory Commission (NRC) welcomes the opportunity to provide comments on Addendum B to ASME/ANS RA-S-2008, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications." ASME and the American Nuclear Society (ANS) and the various participants on the committees and working groups have devoted considerable time and resources to this standard, which is a major element in defining probabilistic risk assessment (PRA) technical acceptability in support of risk-informed decisionmaking. This standard, as published and then endorsed by NRC in Regulatory Guide (RG) 1.200, is supportive of NRC's regulatory risk-informed activities. However, there are improvements related to clarity, consistency, and cohesiveness that will improve the usefulness and stability of the standard. Addendum B did not include these expected improvements.

Certain events occurred prior to development of Addendum B that led to NRC expectations on improvements regarding Addendum B. These events were:

- ASME and ANS decided to combine the various parts (e.g., internal and external hazards) of the PRA into a single joint PRA standard (i.e., ASME/ANS RA-S-2008). The goal was to provide a clean, consistent, and cohesive standard in a single document. This goal was not achieved (e.g., inconsistencies across the standard still existed).

- ASME and ANS published Addendum A (i.e., ASME/ANS RA-Sa-2009) to address the inconsistencies, etc. However, in being responsive to NRC's requested schedule for endorsement, ASME and ANS addressed only the more significant inconsistencies in Addendum A with the intent of publishing Addendum B to address remaining inconsistencies that did not occur.

CONTACT: Mary Drouin, RES/DRA
301-251-7574

Enclosure 1 provides a summary of NRC comments on Addendum B which involve improvements regarding clarity, consistency and cohesiveness. Many of the enclosed comments were provided by the NRC representative on the Committee for Nuclear Risk Management (CNRM) during the ballot on Addendum B. NRC's direction to staff is that, as part of committee activities, they are to express views consistent with the agency views and to strive to reconcile key issues between the Standards Development Organization (SDO) and agency views. Most of the comments provided by our staff representative were either deferred or rejected without adequate explanation or justification.

Issuance of ASME/ANS RA-S-2008, including Addendum A, was a significant accomplishment, and ASME and ANS and all the various participants are to be commended. RG 1.200 endorsed this standard, and it is being used in regulatory activities. However, as part of the PRA policy statement, the Commission noted that PRA applications should be implemented in a consistent and predictable manner that promotes regulatory stability and efficiency. NRC expected that Addendum B would include the improvements and thereby avoid the necessity of having continual changes made to the standard, which does not promote stability and efficiency. Because the various parts (i.e., hazards) have been combined into a single standard, the CNRM should strive to issue a clear and cohesive standard in Addendum B. Deferring known improvements will adversely impact the ability to focus on other priority items. Moreover, as the remaining parts of the standard are completed (e.g., low-power shutdown, Level 2, Level 3, new light-water reactors), the problems will be exacerbated if these issues are not addressed. Consequently, this addendum should be expeditiously issued so that the remaining standards can be finalized and issued.

We hope that our comments will assist in resolving the concerns with Addendum B. Clear and continuous communication between industry, NRC, other stakeholders, and the various standards-developing organizations is the most effective and efficient means of addressing issues. We will continue to engage and interact as appropriate and support this crucial initiative. If you have any questions, please contact Mary Drouin at (301) 251-7574.

Sincerely,

/RA/

Richard Correia, Director
Division of Risk Analysis
Office of Nuclear Regulatory Research

cc: Board of Standards Review
American National Standards Institute
25 West 43rd Street
New York, NY 10036

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Issuance of ASME/ANS RA-S-2008, including Addendum A, was a significant accomplishment, and ASME and ANS and all the various participants are to be commended. RG 1.200 endorsed this standard, and it is being used in regulatory activities. However, as part of the PRA policy statement, the Commission noted that PRA applications should be implemented in a consistent and predictable manner that promotes regulatory stability and efficiency. NRC expected that Addendum B would include the improvements and thereby avoid the necessity of having continual changes made to the standard, which does not promote stability and efficiency. Because the various parts (i.e., hazards) have been combined into a single standard, the CNRM should strive to issue a clear and cohesive standard in Addendum B. Deferring known improvements will adversely impact the ability to focus on other priority items. Moreover, as the remaining parts of the standard are completed (e.g., low-power shutdown, Level 2, Level 3, new light-water reactors), the problems will be exacerbated if these issues are not addressed. Consequently, this addendum should be expeditiously issued so that the remaining standards can be finalized and issued.

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