

NOTATION VOTE


RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary  
FROM: Chairman Gregory B. Jaczko  
SUBJECT: SECY-11-0089 – OPTIONS FOR PROCEEDING WITH  
FUTURE LEVEL 3 PROBABILISTIC RISK  
ASSESSMENT ACTIVITIES

Approved in Part  X  Disapproved in Part  X  Abstain

Not Participating

COMMENTS: Below   Attached  X  None

  
\_\_\_\_\_  
SIGNATURE

8/29/11  
\_\_\_\_\_  
DATE

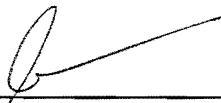
Entered on "STARS" Yes  X  No

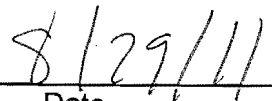
**Chairman Jaczko's Comments on  
SECY-11-0089, "Options For Proceeding With Future Level 3  
Probabilistic Risk Assessment Activities"**

As Commissioners Apostolakis stated in his vote a full-scope and high quality Level 3 probabilistic risk assessment (PRA) is the most complete representation of plant risk. I appreciate Commissioners Apostolakis leadership in this area and have benefited from his invaluable experience. A modern and comprehensive full-scope Level 3 PRA for a site will provide invaluable insights into whether our current metrics are sufficient or whether additional metrics are needed to provide a more complete understanding of risk to the public. With the publication of the 1995 PRA Policy Statement, the Commission has endorsed and encouraged the use of PRAs and other risk tools to strengthen the regulatory framework. Although not all of our activities necessarily lend themselves to PRA type analysis, both the NRC and our licensees rely much more on this technology to make important and routine decisions. Because of this greater and ever expanding reliance on this type of analysis, it is important to ensure our common understanding of not only individual plant risk - but site risk - is complete. In addition, a more complete understanding of site risk may make it possible to expand this valuable tool to other areas such as risk-informed and performance-based emergency preparedness.

I approve in part and disapprove in part Option 3 in SECY-11-0089. I agree with Commissioner Apostolakis that the staff should proceed with a new full-scope comprehensive site Level 3 PRA that will address integrated risk consistent with the recommendations of the ACRS in its June 22, 2011 letter. The staff working with licensees or applicants should select one or more sites that they believe is most suitable for this study based on the staff's judgment.

As I stated during the July 28, 2011 Commission meeting on this topic, there is value from a safety perspective in licensees and applicants developing and maintaining comprehensive site Level 3 PRAs. If all licensees had full-scope and high quality PRAs, licensees would be better able to ensure safety because of a more complete understanding of risk at each site. In addition, the NRC would be in a better position to replace prescriptive regulatory requirements with more flexible and effective risk-informed performance-based requirements along the lines of § 50.48, "Fire Protection," and § 50.69, "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors." As I did during the 2011 Regulatory Information Conference, I call on the industry to put the infrastructure in place so every site can have a comprehensive Level 3 PRA within the next 5 years.

  
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Gregory B. Jaczko

  
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Date