

## MFFFNPEm Resource

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**From:** Tiktinsky, David  
**Sent:** Friday, February 03, 2012 11:56 AM  
**To:** 'Gwyn, Dealis W.'  
**Cc:** Campbell, Larry; Bowen, Jeremy; Morrissey, Kevin; MFFFHearingFile Resource; Atack, Sabrina  
**Subject:** FW: MFFF Graded QA Meeting

Some questions from Larry related to you grading presentation. These questions were designed to help us understand your basis for the grading program. Thanks.

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**From:** Campbell, Larry  
**Sent:** Friday, February 03, 2012 10:54 AM  
**To:** Tiktinsky, David  
**Cc:** Atack, Sabrina; Soto, Soly; Marcano, Jonathan; Hammelman, James; Morrissey, Kevin; Bowen, Jeremy; Roman, Cinthya  
**Subject:** MFFF Graded QA Meeting

Dave, a few thoughts for you regarding the February 2, 2012, meeting. As I stated in a previous e-mail, I do not believe 2.5 hours is long enough to get through the 50+ slides, but we will see. I have numerous comments, but perhaps the following are the most important. Need some discussion to understand the slides and it might be best to let them know this ahead of time.

**It may be a bit late to ask, but I would like for MFFF to address at a high level,** which portions of the following RGs and Part 50 regulations, (listed on Pages 21 and 22 of their slides) are not going to comply with (keeping in mind that many are based on using PRA type analysis):

1. RG 1.176, "An Approach for Plant Specific, Risk Informed Decisionmaking: Graded Quality Assurance" (requires that the risk ranking be based on PRA and that the QA program describe the ranking process as well as the graded QA control to be applied to low risk significant SSCs. RG 1.176 was issued in 1998 and more recent guidance on the subject was issued in 2006 (RG 1.201)
2. LES Amendment Request, Dec 2010, which requires that the graded QA program (including graded QA controls) be described in the NRC Approved QA Program Document. Are they going to do the same?
3. **10CFR50.69**, "Risk Informed Categorization and Treatment of SSC for Nuclear Power Reactors." (Are they going to develop similar thresholds such as LERF and CDF and use PRA in the MFFF categorization process?) This regulation went into effect around 2004.
4. RG 1.189, "Fire Protection for Operating Nuclear Power Plants," is a very thick document – are they going to use all or what portions of this document? What portions are they not going to use?
5. RG 1.143, RG 4.15, etc. Same, what portions are they not going to use?

**Additionally, to what extent will they be using** RG 1.201, (2008) "Guidelines for Categorizing SSC in Nuclear Power Plants According their Safety Significance." This document describes an acceptable method for complying with the Commission's requirements contained in **10 CFR 50.69** (2004) with respect to categorization of SSCs that are considered in risk-informing, etc. Specifically, this process determines the safety significance of SSCs and categorizes them into one of four risk-informed safety class categories. Etc.

**Lastly,** on Page 23 reference is made to Part 21 and I am confused and need some explanation. I do not think it is possible to apply Graded Controls to any 10 CFR Part 21 requirement – no such grading text is contained in the Part 21 regulations – any grading of the requirements contained in Part 21 (reporting, evaluation, CGI dedication, etc) would require an exemption request. Now you probably can grade certain CGI dedication activities based on the risk significance of the SSC, but not any of the CGI dedication requirements contained in Part 21.

Give me a call if you would like to discuss. 492-3295

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