

# **Non-Pilot Licensees Perspectives on NFPA 805 LAR Reviews**

**NRC Public Meeting  
June 27, 2012**



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# Purpose

- **Provide Non–Pilot Observations on the LAR review process**
  - LIC-109 Reviews
  - Site Audits
  - RAI Process
  - RAI Content
  - SE

# LIC-109 LAR Application Reviews

- **Following the LAR Template should provide reasonable assurance of acceptance.**
- **Technical Issue identification does not appear stable.**
  - **Expectations of level of detail on Fire PRA topics that could impact results of acceptance review (e.g., FRE calculation results, Control Room treatment).**
- **By any measure the ANO LIC-109 review results do not reflect well on the collective process.**

# Site Audits

- **Process is working well**
  - **NRC / Contractors have been prepared.**
  - **Licensee / NRC interface is open and effective.**
  - **Licensees understand need to provide sufficient technical resources.**
- **ANY IMPROVEMENTS ??**

# RAI Process

- **Communication methods used with Licensees is inconsistent:**
  - **Some received no RAI response feedback.**
  - **Some received feedback and made improvements to the RAI responses.**
  - **Some received informal questions.**
  - **Varying RAI response due dates 45/60/90/?**
- **Consistency in communication methods and use of feedback on draft RAI responses can reduce LAR review times.**

# RAI - Content

- **We understand the complexity of the NFPA 805 license application.**
- **Additional knowledge is gained through experience in preparing and reviewing LARs.**
- **It is important, for a consistent understanding of an expected level of detail in the LAR and supporting documentation.**

# RAI – Content (continued)

## ■ FPRA

- Treatment of the peer review process per RG 1.200.
- Increasing level of detail and focus on Internal Events F & O's.
- Suggestions and their resolution in LAR.
- Expectation on treatment of sensitivity on “delta risk” as opposed to parametric uncertainty on the base FPRA results.

# RAI – Content (continued)

- **FPRA (continued)**
  - **Expectations on performing sensitivity analysis when using fire modeling parameters from approved documents (e.g., NUREG-1805).**
  - **Expectations on treatment of circuit failure probabilities based on draft results from circuit testing (control power transformer spurious operation probabilities).**



# RAI – Content (continued)

## ■ GENERAL

- EPRI TR 1006756 document treatment inconsistent with pilots.
- Expectations on the usage of Rev 2 of NEI 00-01 during reviews when NEI 00-01, Rev 1 was available to Licensees while work was performed.
- Expectation to perform bounding calculation to address Radiation Release.

# Safety Evaluations- What Done looks Like

- **Initial Non-Pilots are nearing 1 year since initial submittal.**
- **NFPA 805 LAR reviews don't have a schedule, other LAR processes (LR) do.**
- **NEI/NRC Management meeting needs to add this as an agenda item and begin discussing LAR review status / SE process.**
  - **Interim License Condition / Plant Changes**
  - **SE draft review process and timing**

# Questions



# LAR Template Discussion

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# Purpose

- **Discuss Background on LAR Template**
- **Discuss Experience to Date with LAR Template**
- **Discuss Types of Changes made since 2010 timeframe**

# Background

- **RG 1.205-LAR/SE Template Meetings (2009-2010 – ~ 8 public meetings held)**
- **Concurrent with/following RG 1.205 Rev. 1 (Dec. 2009) and Harris SE (June 2010)**
- **SE Template made public in November 2010 to reflect lessons learned.**

# Background

- No intention of making LAR/SE templates “requirements”.
- “It’s a template not a straitjacket”
- Late 2010 – NRC/Industry agreed that industry/NRC focus should be on technical issues than additional “fine tuning” of template.

# Experience to Date

- **Most/all Licensees have followed template with very few exceptions**
- **Very useful resource in providing consistent preparation and review of LAR and the supporting documents (i.e., deliverables, schedules, project management, etc.)**
- **TF continues to update the template as expectations changes/lessons are learned.**



# Types of Changes

- **Structure and Sections not Changed**
- **Update for Guidance in Approved FAQs**
- **Update to Address Generic RAIs/Topics**
- **Typos/Editorial/Consistency Issues identified by TF**

# Changes

- **FAQ Development and Approval (since 2010). Resolution and LAR content often discussed in FAQs**
  - **FAQ 07-0030 Recovery Actions**
  - **FAQ 07-0038 Lessons Learned MSOs**
  - **FAQ 08-0054 NFPA 805 Ch. 4**
  - **FAQ 09-0056 Rad Release**
  - **FAQ 10-0059 Monitoring**
  - **FAQ 11-0062 UFSAR**

# Changes

- **Task Force Feedback during LAR development**
- **NRC Feedback during FAQ and other public meetings**

# Changes

- **Generic RAIs introduced by NRC at 11/18/11**
- **NEI developed Generic RAI list, with proposed resolutions, in order to provide real time guidance for non-pilot licensees to try to address/avoid RAIs**
- **Changes often “Note to LAR Developers” to give guidance rather than specific wording.**

# Questions



# **Path Forward for Unreviewed Analysis Method F&Os**

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# UAM Background

- **Type of Fact and Observation used in peer review process**
  - Previously, only “Findings,” “Suggestions,” and “Best Practices”
  - Added to NEI 07-12, FPRA Peer Review Process Guidelines in June 2010
- **Definition (per NEI 07-12)**
  - An observation regarding the use of methods unfamiliar to the review team. Such an observation is appropriate when the review team does not possess the expertise necessary to evaluate the technical adequacy of methods used in the FPRA
  - 07-12 specified that an expert review panel would evaluate these to assist utilities in dispositioning UAM F&Os
- **Not the same as a method that is different from those described in NUREG 6850**

# Purpose of Adding UAM F&Os to Process

- Enabled conduct of more peer reviews in a limited period of time to support NFPA 805 applications
- Solution to handling rapidly improving methods in FPRAs
- Ensured consistency in peer review process



# Current Process

- **Peer review team identifies UAM F&O in final report**
- **Utility sends relevant information to consensus review panel**
- **Consensus review panel conclusions referenced to close out UAM F&O**

# Current Process

- **Peer review teams receive previous panel conclusion reports as part of their pre-visit package for review**
  - **Allows for familiarization with newer methods**
  - **Intent is to reduce UAM F&Os as time passes**
- **Alternatively, utilities may submit methods to consensus panel in advance of peer review**

# Future Process

- **New proposed methods with defined applicability (not plant-specific)**
  - Consensus panel evaluates
  - Final panel report provided to all peer review teams
- **Plant-specific UAM F&Os in peer review reports**
  - Owners Groups will form augmented peer review teams to disposition
  - Anticipate few of these going forward