

**NRCREP Resource**

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**From:** Tim Collins [timothy.collins@nrc.gov]  
**Sent:** Tuesday, June 26, 2012 3:44 PM  
**To:** NRCREP Resource  
**Subject:** Response from "Comment on NRC Documents"

2012 JUN 28 AM 9:02

Below is the result of your feedback form. It was submitted by

Tim Collins ([timothy.collins@nrc.gov](mailto:timothy.collins@nrc.gov)) on Tuesday, June 26, 2012 at 15:44:24

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Document Title: DG-1285: An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis (ML12012A006)

Comments: First paragraph of 2.1.1: The following sentence is being changed by deleting all the words after "philosophy:" "The defense-in-depth philosophy has traditionally been applied in reactor design and operation to provide multiple means to accomplish safety functions and prevent the release of radioactive material. It has been and continues to be an effective way to account for uncertainties in equipment and human performance and, in particular, to account for the potential for unknown and unforeseen failure mechanisms or phenomena, which (because they are unknown or unforeseen) are not reflected in either the PRA or traditional engineering analyses." Comment: Don't delete the preceding two sentences. Protecting against "unknowns" and uncertainties is an important piece of D-I-D.

Second paragraph of 2.2.1: I think this paragraph mixes two separate thoughts. The 3 layers are elements of our overall approach to safety and REFLECT the defense in depth philosophy. However we also use the D-I-D philosophy within each layer.

Paragraph under 2.1.1.1: Same comment as above. The "Three Layers" do not constitute defense in depth. They are elements of our approach to protecting public health and safety and REFLECT the defense in depth philosophy.

Paragraph under 2.1.1.1: The "balance" criterion cannot be discussed without defining a balance point. What is an "accident"? e.g. Is a turbine trip an accident? Is an SBO an "accident"? Is a vessel rupture an "accident"? I've always advocated, "core damage" as the balance point. But in any case, a balance point must be defined if "balance" is going to be evaluated.

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5/17/2012  
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SUNSI Review Complete  
Memorandum = ADM-013

1 E-RIDS = ADM-03  
Add = R. Carpenter (Yges)  
- m. Crow (msc)