

## **Campbell, Stephen**

---

**From:** Lyon, Fred  
**Sent:** Thursday, April 26, 2012 2:45 PM  
**To:** Campbell, Stephen  
**Cc:** Milano, Patrick; Raghavan, Rags  
**Subject:** RE: Completing LIC-504, Integrated Risk-Informed Decision-making Process

I will attend the meeting, and I will tell you now that:

The objective of LIC-504 is to outline a process by which the NRR staff and managers perform the evaluation and communication of risk-informed decisions and thereby improve NRR's efficiency and effectiveness. It addresses the GAO recommendations to:

(1) Develop specific guidance and a well-defined process for deciding when to shut down a nuclear power plant. The guidance should clearly set out the process to be used, the safety-related factors to be considered, the weight that should be assigned to each factor, and the standards for judging the quality of the evidence considered.

(2) Improve the U.S. Nuclear Regulatory Commission's (NRC's) use of probabilistic risk assessment (PRA) estimates in decision-making by (1) ensuring that the risk estimates, uncertainties, and assumptions made in developing the estimates are fully defined, documented, and communicated to NRC decision-makers, and (2) providing guidance to decision-makers on how to consider the relative importance, validity, and reliability of quantitative risk estimates in conjunction with other qualitative safety-related factors.

LIC-504 is not appropriate in this situation, because we are not making a risk-based decision to shut down the plant, or take any other action associated with the plant. We are trying to get information from the licensee necessary to make a determination of whether they are in compliance with their licensing basis and GDC 2. I cannot make a risk-based decision based on information that I know to be unreliable, because it is incomplete and does not take into account uncertainties in the methodology and changes in the analysis assumptions. We do not currently have the information necessary to enter LIC-504, because our management has delayed and resisted us from getting it from the licensee for the last month.

**From:** Campbell, Stephen  
**Sent:** Thursday, April 26, 2012 2:25 PM  
**To:** Milano, Patrick; Raghavan, Rags; Lyon, Fred  
**Subject:** Completing LIC-504, Integrated Risk-Informed Decision-making Process

Rags, Pat and Fred:

I just sent a scheduler to discuss completing LIC-504 for the WBN-1 hydrology. This is an assignment for each so we can outline a process for the development and documentation of risk-informed decisions related to this issue. It is required as part of the Davis-Besse lessons-learned process so that we can document an agency decision. I expect a session that we brainstorm to what the final outcome is and the various ways we can get to that final outcome, document it and present it to management.

My expectation is that each of you participates in this meeting.

**Stephen J. Campbell,**  
Branch Chief  
NRR/DORL/LP-WB

## Campbell, Stephen

---

**From:** Raghavan, Rags  
**Sent:** Thursday, April 26, 2012 4:23 PM  
**To:** Campbell, Stephen; Milano, Patrick; Lyon, Fred  
**Subject:** RE: Completing LIC-504, Integrated Risk-Informed Decision-making Process

Steve:

I will attend the meeting per your direction. But you need to understand that your expectations and objectives for the meeting are unreasonable and not achievable for the following reasons

1. **NRC's regulations and policies do not allow risk-based determination of adequate protection.**  
The issue at WBN Unit 1 is whether the staff, based on TVA's own calculations, has reasonable assurance of safe operation. This is not an operability issue.
2. Even if this is possible, the staff does not have necessary information. You need to issue a 50.54(f) letter to obtain Information which you do not want to do.
3. Non conforming condition / operability determination is Region's responsibility. If they need assistance they need to submit a TIA
4. In all cases, compliance with license and assurance for safe operation rests with TVA. The burden of proof is with TVA and not with he staff.

I have discussed these issues with you several times, and continued discussions on this subject to probe alternatives rather than following the regulatory process does not adequately address immediate safety issue..

rags

**From:** Campbell, Stephen  
**Sent:** Thursday, April 26, 2012 2:25 PM  
**To:** Milano, Patrick; Raghavan, Rags; Lyon, Fred  
**Subject:** Completing LIC-504, Integrated Risk-Informed Decision-making Process

Rags, Pat and Fred:

I just sent a scheduler to discuss completing LIC-504 for the WBN-1 hydrology. This is an assignment for each so we can outline a process for the development and documentation of risk-informed decisions related to this issue. It is required as part of the Davis-Besse lessons-learned process so that we can document an agency decision. I expect a session that we brainstorm to what the final outcome is and the various ways we can get to that final outcome, document it and present it to management.

My expectation is that each of you participates in this meeting.

**Stephen J. Campbell,**  
Branch Chief  
NRR/DORL/LP-WB  
U.S. Nuclear Regulatory Commission  
Office - O8H1  
Mail Stop - O8H4A  
Washington, DC 20555

✉ E-mail: [stephen.campbell@nrc.gov](mailto:stephen.campbell@nrc.gov) | 📞 Office: (301) 415-3353 | 📠 NRC Cell: (202) 527-5771 | 📠 Fax: (301) 415-1885



## Campbell, Stephen

---

**From:** Milano, Patrick  
**Sent:** Friday, April 27, 2012 7:36 AM  
**To:** Campbell, Stephen  
**Cc:** Raghavan, Rags; Lyon, Fred; Laur, Steven  
**Subject:** RE: Completing LIC-504, Integrated Risk-Informed Decision-making Process

Steve,

I agree with Rags and Fred that this is not the appropriate process at this time for WBN Unit 1. I request that you invite Steve Laur to attend to that we can have a discussion of applicability before proceeding further.

Pat

**From:** Campbell, Stephen  
**Sent:** Thursday, April 26, 2012 2:25 PM  
**To:** Milano, Patrick; Raghavan, Rags; Lyon, Fred  
**Subject:** Completing LIC-504, Integrated Risk-Informed Decision-making Process

Rags, Pat and Fred:

I just sent a scheduler to discuss completing LIC-504 for the WBN-1 hydrology. This is an assignment for each so we can outline a process for the development and documentation of risk-informed decisions related to this issue. It is required as part of the Davis-Besse lessons-learned process so that we can document an agency decision. I expect a session that we brainstorm to what the final outcome is and the various ways we can get to that final outcome, document it and present it to management.

My expectation is that each of you participates in this meeting.

**Stephen J. Campbell,**  
Branch Chief  
NRR/DORL/LP-WB  
U.S. Nuclear Regulatory Commission  
Office - O8H1  
Mail Stop - O8H4A  
Washington, DC 20555

✉ E-mail: [stephen.campbell@nrc.gov](mailto:stephen.campbell@nrc.gov) | ☎ Office: (301) 415-3353 | 📞 NRC Cell: (202) 527-5771 | 📠 Fax: (301) 415-1885

