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From: Stanislav Hustak <hus@ujv.cz>
Sent: Monday, May 27, 2013 5:22 AM
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Stanislav Hustak (hus@ujv.cz) on Monday, May 27, 2013 at 05:21:52

Document_Title: NUREG-1855, rev. 1

Comments: 1) Reference to Section 4.3.1.

The treatment of the uncertainty in RIDM resulting from the selection of the proper undesired events (risk metrics) in PRA, which can be important for risk informed decision making, should be addressed in NUREG-1855:

Rationale:

There is always some uncertainty in RIDM resulting from the selection of the proper undesired events (risk metrics) to be the main measures to determine the acceptability of risk level at the plant (risk characterization). The example is the selection of either LERF or LRF or general URF (Unacceptable Release Frequency defined in the other way, e.g. CLI from EUR requirements) for RIDM. The different risk metrics generally give different PRA results and there is an uncertainty, which metric is the proper one.

The impact of this type of uncertainty (how much the selection of the main risk metrics can affect PRA insights and RIDM) is not addressed in the report. For example, when screening analyses in the step C-1 would be done from the point of LERF, they could be irrelevant for the uncertainty assessment from the point of LRF. The uncertainty resulting from the possible inadequacy of Level 2 risk metrics is in fact the uncertainty in the PRA scope caused by the omission of the Level 3 PRA in RIDM (Level 3 PRA would integrate and weight all release categories). This aspect is not addressed in the report as well. Note that this uncertainty due to possible inadequacy of Level 2 risk metrics is not equivalent to the uncertainty in the PRA scope caused by the omission of the full scope Level 2 PRA, since even limited level 2 PRA can evaluate LRF as a single release category instead of LERF.

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