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NEI Letter

Subject: Industry Paper on Addressing Cumulative Impact through Generic Prioritization and Plant-Level Integrated Schedules

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NUCLEAR ENERGY INSTITUTE

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Mr. R. William Borchardt
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Paper on Addressing Cumulative Impact through Generic Prioritization and Plant-Level Integrated Schedules

Project Number: 689

Dear Mr. Borchardt:

The public interactions have been constructive on addressing the cumulative impact of industry and regulatory (NRC) actions on commercial nuclear energy facilities. The attached paper documents the proposed industry approach for addressing the cumulative effects of regulatory actions on power reactors that has been discussed at recent public meetings. The paper is intended to be the basis for further public discussion on the development and implementation of pilot guidance to test the approach prior to starting industrywide implementation towards the end of 2014.

There are three elements in the industry approach: issue definition and assessment, generic prioritization and the use of plant-specific integrated implementation schedules. The approach is risk-informed and builds on the 1992 Policy Statement on Integrated Schedules and the Integrated Safety Assessment Program (ISAP) of the 1980s and 1990s. This approach uses risk insights from existing probabilistic risk assessments (PRAs) that for the majority of power reactors are sufficient for prioritization and relative ranking of activities.

There has been substantial growth in scope and intensity of industry and NRC personnel activities and interactions in recent years as we continue to implement nuclear plant safety improvements, complete the response to the lessons learned from the Fukushima accident, and further improve plant material conditions and reliability. As demands on industry and NRC resources increase, it is vital that workloads be properly

prioritized to ensure that issues and projects with the highest safety significance receive appropriate attention and resource allocation. Otherwise, matters of lower safety significance may inadvertently consume resources that could have been better applied on matters of higher safety significance. The importance of this issue warrants timely action to assure that we have a common understanding on the approach for addressing this issue.

The industry approach is consistent with the commission's proposed initiative, Improving Nuclear Safety and Regulatory Efficiency (COMGEA-12-0001/COMWDM-12-0002). We believe that there are three main phases for implementing the initiative:

1. Completing existing risk-informed activities,

2. Implementing the approach for addressing cumulative impact described in the attached paper, and

3. Identifying future risk-informed activities.

The proposed initiative discusses prioritization as an incentive for licensees to further develop PRAs that meet the scope of NRC-endorsed consensus standards in Regulatory Guide 1.200. The industry is addressing all currently endorsed NRC PRA standards, and is moving towards the expectations articulated in the COMGEA-12-0001/COMWDM-12-0002 on a timeline controlled by the supporting infrastructure and limited skilled PRA resources. All operating plants have developed PRAs that have been peer-reviewed or self-assessed to the internal events at-power PRA standard, which addresses Level 1 and Large Early Release Frequency (LERF). The majority of the of power reactors is developing fire PRAs. Numerous licensees are transitioning to the National Fire Protection Association (NFPA) 805 standard and other licensees are developing fire PRAs for other regulatory purposes to support more reliable and safer plant operations. Seismic PRAs are being developed on a sequenced basis to support the resolution of post-Fukushima regulatory actions. The industry believes the prioritization initiative would improve industry confidence in PRA and provide an additional incentive for the further development of PRAs and risk-informed applications.

The industry would like to begin public discussions on the pilot guidance once there is a common understanding on the concepts described in the attached paper that is sufficient to provide the confidence for moving forward with piloting of the proposed approach. We believe those discussions could start in early August 2013, based on the progress achieved in the public meetings to date.

Fuel cycle facilities will monitor the progress and lessons learned from the pilot activities for power reactors as they move forward with an approach for addressing the cumulative effects of regulatory actions.

If you or your staff has questions on the attached paper, please contact Biff Bradley at NEI (202-739-8094, reb@nei.org) or me.

Sincerely,

Adrian Heymer

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