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Conceptual Example of a Proposed Risk Management Regulatory Framework Policy Statement

Comment On: NRC-2013-0254-0004

Conceptual Example of a Proposed Risk Management Regulatory Framework Policy Statement

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General Comment

Comment by Robert J. Budnitz, arising from the NRC public meeting on 30 January 2014 on the "draft white paper of a conceptual example of a proposed risk management regulatory framework policy statement"

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COMMENT

On slide 30 of Mary Drouin's presentation on 30 January 2014, the final bullet reads:

Risk assessment should be capable of evaluating and quantifying uncertainties

In this comment I will deal only with PRAs that assess the safety of nuclear power plants (NPPs).

The current ASME-ANS Standard for PRA (for LWRs in operation) has requirements for evaluating and quantifying uncertainties, but it is recognized by all that these requirements are not consistent from one Part of the PRA standard to another, because the standard's Parts were written by different groups that did not coordinate fully on this topic. Mary Drouin is personally very familiar with this technical issue.

*SUNSI Review Complete
Template = ADM-013*

*F-RFDs = ADM-03
Add = M. Drouin (mxd)*

The ASME-ANS Joint Committee on Nuclear Risk Management (JCNRM) (which I co-chair) is currently beginning a year-long process to develop the next Edition of the PRA standard, and in the course of this process we will be striving to bring more consistency across our requirements concerning analyzing and otherwise treating uncertainty.

If the NRC, either through a Commission policy statement or via a different vehicle, has expectations concerning how NPP PRAs “should be capable of evaluating and quantifying uncertainties” [the slide’s words], it would be helpful to have a dialog between NRC staff and our JCNRM standards committee sometime soon, so that our subsidiary writing group assigned to this topic can have the benefit of any thinking on the NRC’s side on this matter. Even if the feedback to our JCNRM group is not yet formalized as an NRC formal position, informal discussions with the staff would be of benefit to the JCNRM.