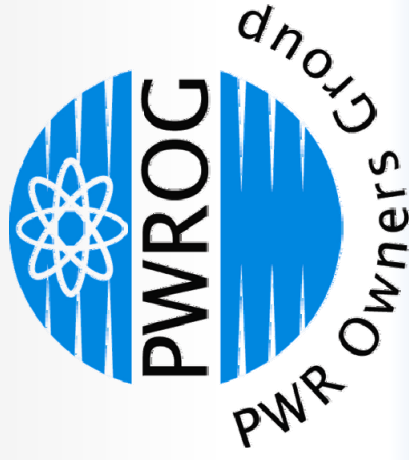




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Initiating Event SDPs

May 19, 2014

Roy Linthicum
Chairman

Risk Management Committee

Are Initiating Event SDPs Valid ?

- Industry position is that SDPs are inappropriate for Initiating Events
 - If the regulatory position is to perform SDPs for initiating events, the metric should be delta CDF for consistency with other ROP processes
 - There is no consensus method for converting initiating event CCDF to delta CDF
- This is a policy-level issue outside the scope of the PWROG effort.

Areas of Agreement

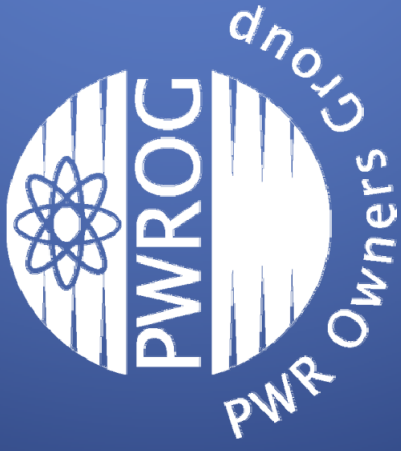
- Bayesian Updating of Initiating is NOT appropriate and inconsistent with SDP process
- SDP should use average maintenance model
 - Unrelated failures that occur during the event should NOT be considered in the SDP

Areas of Agreement

- For Findings that always cause an Initiating Event, multiplying the CCDP by 1/year provides a reasonable estimation of delta CDF

Areas of Disagreement

- For Findings that do NOT always cause an Initiating Event, multiplying the CCDP by 1/year significantly over estimates the risk significance of the finding
 - These types of issues are appropriately accounted for other ROP Performance Indicators
 - ISG 2/3/14 notes that SDPs should NOT be performed for findings unless they always result in an Initiating Event
 - Staff draft White Paper uses an example where the finding does NOT always result in and Initiating Event



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