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# Initiating Event SDPs

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# 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

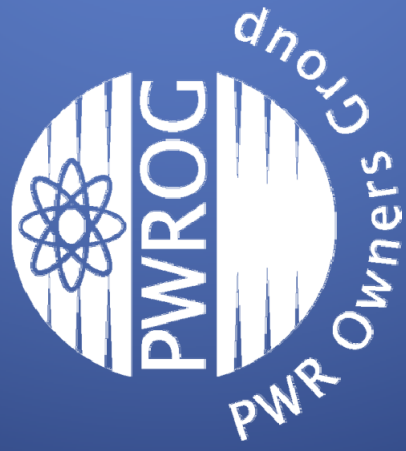
# Areas of Agreement

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- 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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