

NRC PRA Technical Adequacy Working Group Summary for Objective 2 Improve process for documentation and closure of peer review Facts and Observations

Background

There is no explicit guidance on the close-out of peer review Facts and Observations (F&Os), Findings and Suggestions.¹ NRC and industry guidance is geared towards how peer reviews (and their findings) are used to support an application; not in achieving close-out of the findings. There is discussion of how new peer reviews need to consider previous peer reviews and licensees rely on the most recent, or “latest,” peer review, as augmented by gap assessments if the latest peer review was not against the latest endorsed PRA Standard and latest implemented revision to Regulatory Guide 1.200. After a peer review, the licensee typically addresses or “dispositions” each F&O per their PRA update processes and procedures. The licensee then identifies their implementation of their proposed resolutions, or “dispositions,” of the peer review findings within each risk-informed application; including justification and application-specific actions performed (e.g., sensitivity analyses) for those findings not fully resolved for the application.

Without a formal close-out process, risk-informed license applications were required to address all findings from the latest peer review, as augmented by findings from a gap assessment if there is not a peer review against the latest endorsed PRA Standard (but a previous peer review must have been performed for the hazards subject to the application). However, because there is implicit guidance that peer reviews can be performed to close-out earlier peer reviews and because there have been issues with how the disposition of F&Os are documented (e.g., the finding is not fully characterized, the disposition only notes disagreement with the peer review, the disposition may not address all issues or extent of condition, etc.), the NRC has previously accepted the performance of a new peer review to close earlier findings.

Per the PRA Technical Adequacy Working Group Problem Statement:

The requirement to retain and report all past peer review F&Os until re-evaluated by another peer review is an administrative burden that provides minimal benefit to the licensee. The current process results in additional burden to the licensee due to the effort required for the preparation of the discussion of PRA technical adequacy section in a License Amendment Request (LAR) which is followed by the documentation of the NRC’s review of the F&O resolution. The NRC review frequently generates subsequent NRC Requests for Additional Information (RAIs) which increases the effort of the licensee in preparing RAI responses. The only currently accepted F&O closure path is the use of the Peer Review process, which is an additional cost and strain on limited PRA resources. In order to reduce this burden on the licensees to retain, report, and review the previously resolved F&Os, there is a need to provide an additional cost effective, robust process to allow licensees to close F&Os and obviate the need for an in-depth NRC review of the base PRA.

The following sections discuss different approaches, including current practice, for close-out of peer review findings as well as issues identified with the level of documentation for peer review findings and their disposition in risk-informed applications, from an NRC perspective.

¹ The three terms have been used interchangeably to account for the various vintages of peer reviews, some of which also included classifications from “A” through “D.”

Current issues identified with the use of F&Os in risk-informed applications

1. Risk-informed submittals typically include only summaries of the F&Os, including only summaries of the actual dispositions for close-out. This material may be insufficient to ascertain whether the disposition proposed to address the concerns specific to the risk-informed application is appropriate.
2. Different risk-informed applications have different submittal requirements with respect to F&Os and the associated dispositions. Most risk-informed applications need to assess the impact of F&Os, relevant to the submittal, which did not meet Capability Category (CC) II. However, there are some notable exceptions. For example, Containment Type A Integrated Leak Rate Test (ILRT) extension requests need only address F&Os which did not meet CC I. Risk-informed inservice inspection (RI-ISI) applications may need to meet different categories, including some supporting requirements (SRs) at CC III, depending on the type of submittal. Finally, the NRC has set a precedent of asking for all relevant F&Os for certain applications, such as NFPA-805 and RITSTF 4b.
3. The relevance of F&Os and their dispositions to an application can be confusing if the licensee has participated in multiple peer reviews, both full- and focused-scope, on multiple versions of the PRA model. Earlier F&Os and their dispositions may no longer apply to the current model and are essentially sunset. F&Os and dispositions from focused-scope reviews may pre-empt those from more recent full-scope reviews as well.
4. Quality of more recent peer reviews, especially for other than internal events, may vary considerably, e.g., due to incomplete nature of the PRA at the time of the review, methodological uncertainty/volatility at the time of the review, or limited expertise of the review team due to limitation on available review personnel for non-internal events PRAs.
5. The limitations on available experts from the industry to serve repeatedly as peer reviewers, especially for the non-internal events reviews, remains to be alleviated. While new staff develop the skills to serve in this capacity, the more experienced staff may be retiring or leaving the nuclear arena, such that the overall total of experts remains static and still insufficient. It should be noted that not all full peer reviews are required to be performed by the Owner's Groups.
6. Disposition of F&Os as "documentation only" is sometimes overused, especially when the concern may have been the unavailability of the required material, at least in some preliminary form, for the team to review. The fact that the F&O cites lack of documentation does not necessarily imply that the concern was reviewed and found to be solved, with only the lack of formal documentation remaining.

Comment [RRL1]: WE should take exception to this comment. If the peer review team can't assess the related technical SRs due to a documentation issue, they are required to write an F&O against the technical SR. Therefore, documentation F&Os should be just that.

1. Original Peer Review Team Close-out

Licensee identifies implementation of the proposed resolutions to the peer review F&Os to the original peer review team. Peer review team determines if the proposed resolution resolves the original F&Os. Licensee may identify proposed resolutions during the actual performance of the peer review, but the peer review team needs to review implementation of the proposed resolution to close-out the F&O. This process has been used on a very limited basis.

PROs

- It ensures continuity and that the staff most knowledgeable about the F&Os evaluates the dispositions.
- It provides independent process for establishing closure of previous peer review findings that do not need to be addressed in new applications.
- The acceptability of the actions by the licensee in closing the finding can be more quickly assessed, as the focus of the team is solely on the prior findings and not against the latest endorsed PRA Standard.
- The costs of this approach should be less than those associated with a new peer review team as the reviewers would already be familiar with the PRA and F&Os and focused only on the close-out of the findings; not on a completely new peer review
- No need for other peer reviews (unless there is a PRA upgrade or additional hazards/modes modeled which would require a focused-scope peer review); only gap assessments to latest PRA Standard would need to be addressed.

CONs

- Close-out of the F&Os may require considerable time, and repeatedly re-assembling even part of the original team, especially with the team leader, may quickly become prohibitive.
- The review would not be against the latest endorsed PRA Standard, but only focused on what was implemented to close the finding.
- May not completely eliminate the potential for NRC performing an audit or asking questions on the close-out of the findings.
- Limited resources for conducting peer reviews results in potential scheduling issues; these impacts are more significant as licensee PRAs are upgraded to address other hazards (e.g., seismic), and thus need peer reviews in these areas too.
- Original reviewers may no longer be available.
- Imposes a standard that is higher than required for resolving issues identified against a safety related quality assurance program.

2. New Peer Review Used for Close-out

This process involves a focused-scope peer review of one element and the close-out of findings within that element (with findings on remaining elements still having to be addressed) or a completely new peer review that re-addresses how the PRA comports with the Standard. In this approach, the licensee has a new peer review performed (total or focused-scope) that includes consideration of previous peer review findings and the licensee's implementation of their proposed resolutions of those findings. Original findings of the newly peer reviewed elements are sunset/eliminated and replaced by any new findings of the new peer review. New peer reviews often result in new findings that have to be addressed in applications. Currently, the licensees decide ~~if it is necessary~~ when to perform a new peer review [based on criteria from the ASME/ANS PRA Standard regarding PRA upgrades](#).

This process could also be implemented on a periodic basis (e.g., every 10 or 15 years or after a significant number of PRA ~~upgrades~~[updates](#)) to ensure all PRAs across the industry are maintained up-to-date to the latest endorsed PRA Standard and resolution of findings is part of a regular, formal process. This process may become more important as the use and scope of PRAs expand. [However, most licensees will perform peer reviews on a relatively regular basis regardless, given the criteria for upgrades as outlined in the ASME/ANS PRA Standard.](#)

PROs

- A new peer review allows an independent consideration and review of how prior findings were addressed by the licensee.
- It provides an independent process for establishing closure of previous peer review findings that do not need to be addressed in new applications
- It updates peer reviewed elements to the latest endorsed PRA Standard and encourages PRAs to be kept relatively contemporary as methods, plant configurations, etc., evolve.
- [Need not secure availability from original peer review team members](#)

CONs

- Some of the important knowledge of the issues which generated the F&Os may be lost without participation by the original reviewers. This process requires that the F&Os and the associated dispositions are sufficiently documented such that close-out by a new team is viable.
- Limited resources for conducting peer reviews results in potential scheduling issues; these impacts are more significant as licensee PRAs are upgrade to address other hazards (e.g., seismic), and thus need peer reviews in these areas too.
- May not completely eliminate the potential for NRC performing an audit or asking questions on the close-out of the findings.
- [Non-trivial burden associated with assembling a full peer review team.](#)
- [Imposes a standard that is higher than required for resolving issues identified against a safety related quality assurance program.](#)

3. NRC Review and Close-out

Licensee submits information to NRC identifying the implementation of their proposed resolution of findings independent of any risk-informed applications. NRC determines if the proposed resolution resolves the original findings or if additional information/action is needed. This process is informally being applied, on a very limited basis, for licensees with both NFPA-805 and other risk-informed LARs being reviewed concurrently in order to improve schedule and reduce regulatory burden.

PROs

- It provides a regulatory process for establishing closure of previous peer review findings that do not need to be addressed in new applications.
- No need for other peer reviews (unless there is a PRA upgrade or additional hazards/modes modeled which would require a focused-scope peer review); only gap assessments to latest PRA Standard would need to be addressed.
- The potential for a future audit or questions on the resolution of the finding would be greatly reduced. (The possibility may not be eliminated altogether, since not all potential applications of the PRA can be foreseen during the “generic” close-out.) Common risk-informed applications (e.g., Risk-Informed Technical Specification Task Force (RITSTF) Initiative 5b, etc.) would no longer need detailed PRA Technical Adequacy review and could instead use the Consolidated Line Item Improvement Process (CLIIP).

CONs

- Significant up-front resource and time investment for both the licensee and the NRC as this is essentially an application review, though only focused on resolution of findings, and involves schedule, resources, and associated costs typical of a regulatory review. Similarly, this process will likely require RAIs in order to come to agreement on the closure of some findings, which will extend such reviews well beyond the length of other approaches that would typically be less than two months. This process will primarily benefit licensees that plan on submitting multiple risk-informed applications.
- It would not necessarily be against the latest endorsed PRA Standard if the peer review was conducted using an earlier version of the standard. ~~but~~ The review would be only focused on what was implemented to close out the finding, unless a gap assessment is required.
- Imposes a standard that is higher than required for resolving issues identified against a safety related quality assurance program.

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4. Licensee Close-out

Licensee documents implementation of proposed resolution of findings to close-out peer review findings, by using internal independent resources or contracted independent resources. This process has essentially nominal additional costs or impacts beyond the already established need to document closure of findings and should be part of the existing licensee processes for updating the PRA. Documentation is retained for NRC audit in context of risk-informed application reviews and is provided to future peer reviews for consideration.

PROs

- It provides a process, though not independent, for establishing closure of previous peer review findings.
- No need for other peer reviews (unless there is a PRA upgrade or additional hazards/modes modeled which would require a focused-scope peer review); only gap assessments to latest PRA Standard would need to be addressed.

Comment [RRL2]: We believe that independence is possible, if criteria call for an uninvolved reviewer from the utility

CONs

- It would not necessarily be against the latest endorsed PRA Standard, in cases where the peer review used an earlier, but only focused on what was implemented to close out the finding.
- ~~• It is not an independent process; it allows licensees to determine solely on their own interpretation that a peer review finding has been adequately addressed~~
- The NRC would not necessarily be provided the F&Os as part of this process and will likely have RAIs or need to audit the close-out documentation to assure there is agreement with the closure of the findings.

Comment [VKA3]: We believe that independence is possible, if criteria call for an uninvolved reviewer from the utility

Comment [VKA4]: We envision this documentation being provided as necessary to support licensing applications

5. Hybrid Approach (Industry Proposed Approach)

This process is a merger of multiple aspects of the above approaches within some hierarchical framework. This will involve the identification of attributes of findings for grouping into types of findings and then the determination of which of the above approaches are appropriate for close-out of specific types of findings.

PROs

- Provides process, ~~though some aspects may not be independent~~ with varying levels of independence, for establishing closure of previous peer review findings that do not need to be addressed in new applications.
- Allows a graded approach to the closure process for peer review findings.
- In resolving most findings, there will be no need for other peer reviews (unless there is a PRA upgrade or additional hazards/modes modeled which would require a focused-scope peer review); only gap assessments to latest PRA Standard would need to be addressed.

CONs

- Requires establishing a hierarchical framework for how to close out findings; including identifying the attributes of findings that can be addressed by various approaches.
- Would not necessarily be against the latest endorsed PRA Standard if an earlier version was used in the peer review, but only focused on what was implemented to close out the finding.
- May not eliminate the potential for NRC performing an audit or questions on the close-out of the findings, especially those findings allowed to be closed by the licensee since this aspect would not be an independent review.
- A monitoring program may be required for F&O close-out, particularly if some F&Os are closed out via NRC reviews of risk-informed applications or if the licensee closes out F&Os without independent review.

Best practices for adequate documentation of F&Os and bases for closure of F&O

- Some licensees provide the full F&O description (including distinguishing between CC I or Not Met) and disposition as well as an additional statement to assess the impact to the specific risk-informed application. Detailed F&Os and dispositions are preferred in order to understand the changes to the PRA model without follow-up questions (and to expedite audits if they are required in the future).
- Some licensees provide a detailed history and description of the peer reviews, gap assessments, and self-assessments. Additionally, some licensees also provide a timeline of PRA model updates and upgrades.
- Only F&Os applicable to the current model and relevant to the submittal are provided.
- The use of new methods or “Unapproved Unreviewed Analysis Methods” (UAMs) should be clearly identified.
- Peer review teams need to be very precise when citing an F&O as “documentation only,” such that a similar disposition by the licensee will be less likely to be questioned by a subsequent reviewer.
- If using a Fire PRA or Seismic PRA instead of a bounding or qualitative analysis to address external events, provide similar documentation as that required for the Internal Events F&Os.
- Risk-significant F&O findings should be closed-out in a timely fashion, in accordance with the licensee’s PRA processes and procedures, and should not wait until a risk-informed application is submitted. (I.e., even if an F&O is not relevant to the submittal, if it is highly risk-significant and has not been resolved for an extended period of time, additional questions may be asked as part of the review.)
- Well-maintained, up-to-date PRAs reviewed to the latest endorsed PRA Standard with thoroughly documented resolutions of findings greatly expedites the review process, particularly for F&Os associated with external events or external hazards.

Comment [RRL5]: I don't agree with this. We need to stop using models in this way. Use of qualitative or bounding analysis should provide sufficient detail to ensure they can be judged bases on the limited nature of the models and the limited impact of the hazards to the application.

Comment [RRL6]: What is a risk significant F&O? We now only have findings and suggestions. In concept, this is okay, but we would need to define what a RS F&O is, and in what context (base model or application).