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Mr. Joseph G. Giitter
Director, Division of Risk Assessment
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI 14-10, Guidelines for Prioritization and Scheduling Implementation

Project Number: 689

Dear Mr. Giitter:

Attached for NRC review and endorsement is industry guidance to support safety focused, risk-informed prioritization and scheduling of plant activities. The guidance incorporates lessons learned from recently completed pilot exercises performed at six plant sites and addresses NRC comments received on an April 2014 draft and during public meetings held in 2014. We request that NRC undertake a general review of this guidance.

The intent of the guidance is to provide a process that can be used by nuclear power plant licensees to characterize and prioritize regulatory and plant-identified actions at their facilities consistent with safety significance. Generic and plant-specific prioritization and plant-specific scheduling are two elements of a proposed approach for improving the process for managing emerging regulatory issues and addressing industry and regulatory concerns on the cumulative impact of regulatory requirements through the use of PRA risk insights.

We believe the process, as outlined in the guidance, provides an important opportunity for plants to focus work activities consistent with the plant-specific risk profile and to achieve faster improvements in safety in the on complex post-Fukushima regulatory environment. This process is intended to be responsive to COMGEA-12-0001/COMWDM-12-0002, "Proposed Initiative to Improve Nuclear Safety and Regulatory Efficiency," and can provide better plant-specific risk understanding and tangible benefits that could promote the development of broader scope PRA models in the long term.

Demonstration pilots were conducted at six plants between April and October of 2014. The pilot activities were conducted using a draft version of the guidelines and were observed by NRC staff. The results from the pilot activities clearly demonstrated the strength and value of a scheduling process that prioritizes plant safety. A final draft of the guidance document, incorporating lessons learned from the pilot activity, was presented during a November 4, 2014 public meeting. This meeting highlighted three areas which required further revision to address NRC comments:


Reliability category should have a clear nexus to safety – Step 1 screening for the reliability category guidance was changed to require establishment of a nexus to safety as a precursor to further consideration of the reliability category. The reliability importance determination (Step 2) was revised to establish importance based solely on the strength of the tie between reliability and safety. These changes address the need to clearly establish a nexus to safety for the reliability category.

Changes to issue prioritization by Integrated Decision-Making Panel (IDP) – A paragraph in Section 5.0 that would allow an IDP to change the Priority determination for an issue based on other considerations was deleted. This change addresses a concern regarding changes that could be made outside of the established prioritization process.

Treatment of plant actions necessary to address inspection findings – The scope of issues to be considered in the prioritization process was modified to limit treatment of corrective actions for inspection finding to those for which a schedule has been established by commitment with NRC. This change will avoid potential conflicts between the prioritization process and current corrective action program guidance.

The industry appreciates the opportunity to work cooperatively with NRC in developing improvements for managing cumulative impact. The efforts to address plant-specific prioritization and scheduling will enhance the focus on work activities and lead to improvements in safety. If you or your staff have questions in regard to the guidance or the demonstration pilot, please feel free to contact me.

Sincerely,



John C. Butler

Attachment

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