

***Significance Determination of
Inspection Findings that Cause
Initiating Event Occurrences
Category 2 Public Meeting***

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Purpose

Discuss proposed changes to:

- 1) IMC 0308, Attachment 3, “Significance Determination Process Basis Document”**
- 2) RASP, Volume 1, Section 8 “Initiating Events Analyses”**



Goal

- **Reach a common understanding of the proposed revisions and the conceptual/technical basis supporting the proposed revisions.**



Next Several Months...

- **NRC staff will develop final drafts of IMC 0308, Attachment 3 and RASP Vol. 1**



Responses to Proposed Revisions

- **The NRC received industry's proposed revisions on 2/17/15**
- **The proposed revisions were shared with NRC staff**
- **Over the past week some staff were able to provide feedback, but not all stakeholders**
- **Professional perspectives should be shared to continue progress**



Responses to Proposed Revisions

RASP, Volume 1, Section 8:

- 1) Does separating the SDP guidance from other programs (e.g., ASP and MD 8,3) add clarity?**
- 2) Should there be a separate section for findings that do not cause IE occurrence?**
- 3) Should RASP refer to IMC 0609, Appendix A, Exhibit 1 for IE screening?**



Responses to Proposed Revisions

- **Per IMC 0609, Appendix A: Findings that **ONLY** cause a plant trip/scram (i.e., the IE-TRANS in the SPAR model) screen to Green.**
- **Possible revision to IMC 0609, Appendix A: Should findings that cause a scram/plant trip **AND** the loss of the normal heat removal path (e.g., LOCHS and LOMFW) without any additional complications (e.g., internal flooding, SG level) screen to Green?**



Responses to Proposed Revisions

- **Remove the phrase “multiply by an inverse year (1/year)”.**

NOTE: Staff proposed changes to IMC 0308, Att 3, Section 8 suggests providing the mathematical basis for the relationship between ICCDP and Δ CDF



Responses to Proposed Revisions

- **Considerations when determining the increase in IEF given a finding was the proximate cause of an IE occurrence:**
 - **Additional contributing causes/factors?**
 - **Exposure time of the finding?**
 - **Recovery credit**



Responses to Proposed Revisions

IMC 0308, Attachment 3:

**1) Discussion of CCDP and Δ CDF.
Recommend clarifying the relationship of both metrics instead of removing the CCDP language.**



Responses to Proposed Revisions

2) Does the SDP, by design, model what happened in the past? Model what is expected in the future? Both?



Responses to Proposed Revisions

- **Backwards look –**
 - Finding is the *proximate cause* of a degraded condition
 - The SDP actually estimates the [risk] given the degraded condition that resulted from the [finding] for the time the degraded condition existed. The nominal [risk], which accounts for normal maintenance, during this time, is subtracted from the [finding risk] to obtain a change in [risk] due to the degraded condition alone.



Responses to Proposed Revisions

- **Forwards look –**
 - The philosophy behind the establishment of [inspection findings] was essentially to assume that conditions indicated by the finding, if their *root causes* were uncorrected, be equivalent to accepting a de facto increase in the CDF and LERF metrics. [The condition] is indicative of an underlying performance issue that, if uncorrected, would be expected to result in similar occurrences with the same frequency.



Next Steps...

- **Staff will revise IMC 0308, Attachment 3 and RASP Volume 1 concurrently.**
- **After NRC staff feedback is incorporated, the staff will communicate the draft revisions at a Category 2 public meeting (e.g., ROP WG monthly meeting).**