

Westinghouse Perspective on Proposed Update Process for Approved Transient and Accident Analysis Methods

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The NRC's Proposed Process Improvement for Licensing Updated Methods Is Worth Pursuing

- Existing review process is time consuming and expensive
- Process improvements are already underway
 - Use of NRC audits to review supporting documentation and better define Requests for Additional Information
- Carefully establishing criteria for when methods updates need prior review by NRC can reduce regulatory burden without adverse impact to safety

NRC's Opportunity Statement Regarding Methods Updates Has Two Elements

“... vendors and licensees who adopted the process would be **responsible for re-evaluating key models at certain intervals,** but may also have the **freedom to update those models without prior NRC approval...**”

Requirements for Reevaluation and Periodic Updates Must Be Carefully Considered

- Existing regulations guard public health and safety
 - 10 CFR 21
 - 10CFR50 Appendix B
 - 10CFR50.46

- Potential issues with periodic reevaluation and updates, including:
 - Quality and availability of data
 - Impact on industry
 - Vendors update methods
 - Licensees update licensing basis
 - Unintended consequences
 - Added complexity of tracking licensing basis as methods as versions proliferate



Stakeholder Engagement is Key to Success of the NRC's Proposed New Process

- Introducing this topic and having this panel discussion at the RIC is a good first step
- Follow up workshops and dialog between NRC and all stakeholders will facilitate identification and resolution of issues
 - what data sources should be considered
 - when should changes be made
 - what changes can be made without prior NRC approval
 - how should updated methods be implemented