



# Staff Recommendations Regarding a Risk Management Regulatory Framework

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# Outline of NRC Draft SECY Paper on Risk Management Regulatory Framework (RMRF)

- SECY paper addresses **four** related topics
  - Section I - RMRF Implementation Options for Power Reactors
  - Section II - Re-evaluation of Fukushima NTTF Rec. 1 Improvement Activities 1 and 2:
    1. New design-basis extension category
    2. Develop criteria for adequacy of defense in depth
  - Section III - Agency-wide risk management policy statement
  - Section IV - Interrelationships between ongoing risk-informed activities
- Significant public involvement – 2 public meetings, 5 ACRS s/c meetings, 3 written public comment periods

# Section I. RMRF Implementation Options for Power Reactors

## Staff Considered 3 options:

1. Maintain current regulatory framework
2. Voluntary alternative risk-informed plant-specific licensing basis
3. NUREG-2150 recommended approach

## Staff conclusion:

- Do not pursue Option 2 at the current time
- Do not pursue Option 3 for operating reactor fleet because modest potential benefits do not justify substantial implementation costs
- **Staff recommends maintaining current framework -- not a “do nothing” approach**

## Section II. Staff Re-evaluation of NTTF Recommendation 1 Improvement Activities 1 and 2

### Activity 1 – New design-basis extension category:

- Staff determined that creating **new design-basis extension category is not necessary**
- Instead, **staff will ensure that new regulations properly specify all regulatory attributes necessary** for requirements that exceed the existing design basis by developing clear internal rulemaking guidance

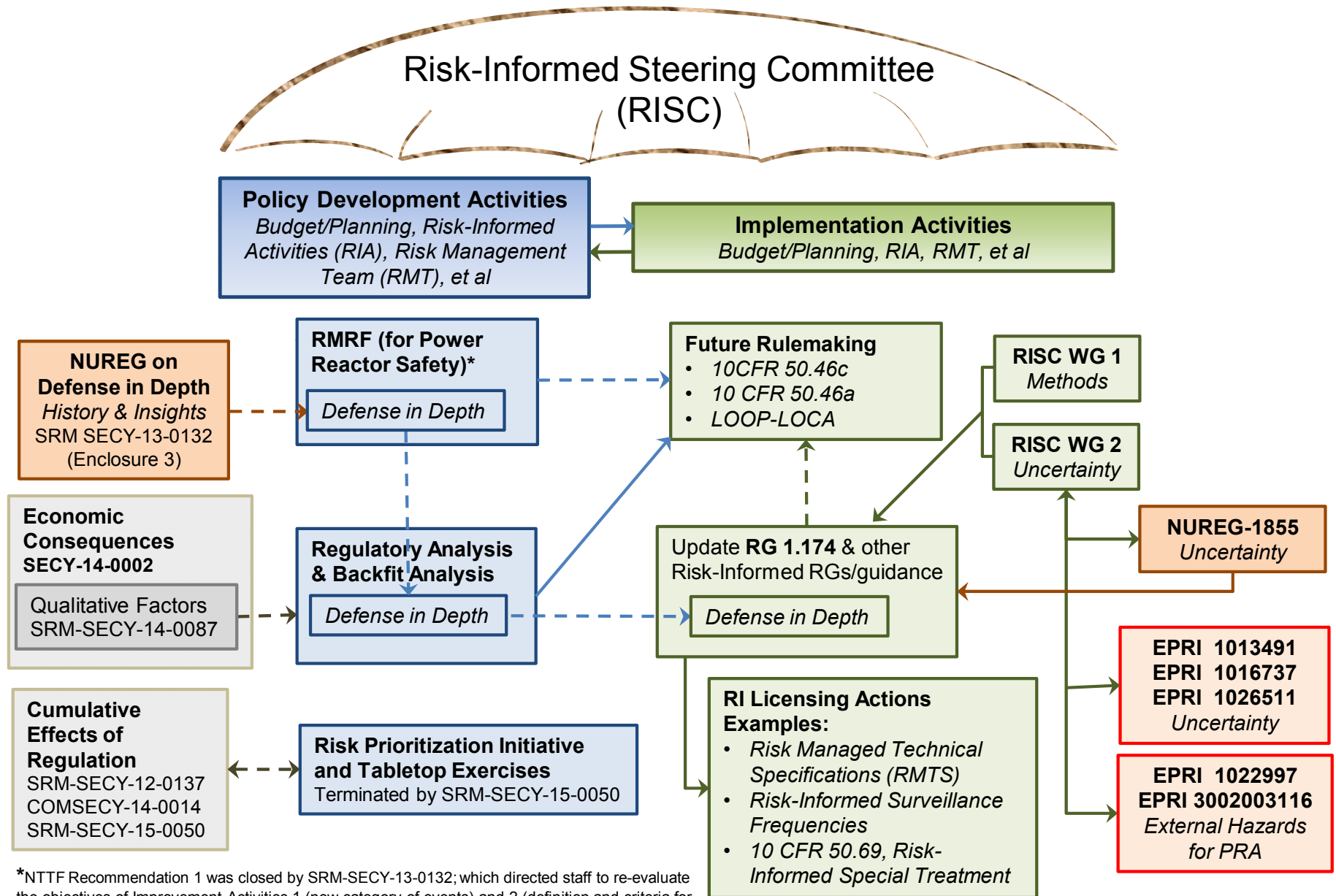
### Activity 2 – Criteria for adequacy of defense in depth:

- While this proposed effort could potentially succeed in establishing predictable, objective criteria for determining the adequacy of defense in depth for power reactor safety, the estimated resource requirements (6.3 FTE over a period of 3 to 4 years) are significant.
- Staff will update defense-in-depth guidance in RG 1.174 as directed by Commission in SECY-11-0014 on Containment Accident Pressure

## Section III: Agency-wide Risk Management Policy Statement

- Premise: An agency-wide risk management policy statement could potentially improve and make more consistent the regulatory framework used for all program areas
- NRC requested public comments on two draft example policy statements (November 2013 and May 2015)
- Public comments were generally not supportive
  - On May 2015 draft, 9 of 10 commenters recommended against an agency-wide risk management policy statement because programs can be appropriately risk-informed under the current policy and guidance

# Section IV. Interrelationships Between Ongoing Risk-informed Activities



\*NTTF Recommendation 1 was closed by SRM-SECY-13-0132; which directed staff to re-evaluate the objectives of Improvement Activities 1 (new category of events) and 2 (definition and criteria for defense-in-depth (DID)) as part of RMRF-related implementation activities.

