

February 12, 2016

MEMORANDUM TO: Sunil Weerakkody, Chief
PRA Operations and Human Factors Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Alexander Schwab, Project Manager */RA/*
Generic Communications Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE JANUARY 21, 2016, PUBLIC PHONE CALL
BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION
STAFF AND STAKEHOLDERS TO DISCUSS TREATMENT OF
FLEX STRATEGIES AND EQUIPMENT IN RISK-INFORMED
DECISION MAKING

On January 21, 2016, a Category 2 public phone call was held between the U.S. Nuclear Regulatory Commission (NRC) and stakeholders. The purpose of the phone call was to seek interested stakeholder input on how to treat flex strategies and equipment in risk-informed decision making.

The NRC opened the public call by discussing what had occurred since the release of the Nuclear Energy Institute (NEI) white papers on crediting Mitigating Strategies Equipment (Agencywide Documents Access and Management System (ADAMS) under Accession No. ML15337A103 and Accession No. ML15337A105) on December 2nd, 2015. The NRC stated that a number of organizations within the NRC had provided comments on the white papers, and that they would make the comments public (ADAMS Accession No. ML16032A428), even though the comments only represented the views of individual staff members.

The NRC indicated that while they felt the white papers were a good start, it would be difficult to endorse white papers that would provide specific guidance on how to credit the mitigating strategies equipment for the complete spectrum of probabilistic risk assessment (PRA) applications. The NRC suggested that it would focus on endorsing crediting mitigating strategies equipment for PRA applications that would not require as much time and rigor to review in order for them to be endorsed, such as the Notice of Enforcement Discretion (NOED) and Significance Determination Process (SDP) applications. The NRC also suggested that certain PRA applications required to meet the standards in Regulatory Guide 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," such as licensing actions and mitigating system performance indicator models, be left for a later date since they would take much more time and effort in order for the NRC to be able to endorse crediting mitigating strategies equipment for those applications.

The NRC then indicated that having several workshops between the NRC and NEI may be the most efficient way to disposition the large number of NRC comments on the white papers.

NEI responded by saying that the intent of the white papers was not to get to a point where they gave completely prescriptive guidance on how to meet each and every application, it was more to give general guidance on what questions to ask that need to be included in each evaluation a licensee may submit. NEI said they would discuss the possibility of the NRC suggested path forward amongst themselves, but wanted to make sure that Maintenance Rule a(4) assessments may be included in the proposed NRC workshops. The NRC responded that a(4) assessments may be a subject of an upcoming workshop, and that they hadn't meant to limit the discussion for the workshops to only the NOED and SDP applications.

During the meeting the attendees were reminded that although their comments were discussed with the staff, no decisions would be made at the meeting. A list of meeting attendees is enclosed.

Please direct any inquiries to Alexander Schwab, Project Manager, at 301-415-8539, or via e-mail to Alexander.Schwab@nrc.gov.

Enclosure:
List of Attendees

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Enclosure:
List of Attendees

DISTRIBUTION:

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EXTERNAL DISTRIBUTION:

Dave Lochbaum (dlochbaum@ucsusa.org)

ADAMS Accession Nos.: ML16033A533; ML16021A029 (Notice); ML16032A428 (Presentation);

***via e-mail**

NRC-001

OFFICE	NRR/DPR/PGCB/PM*	NRR/DPR/PGCB/LA*	NRR/DRA	NRR/DRA	NRR/DPR/PGCB/PM
NAME	ASchwab	ABaxter	JMitman	SWeerakkody	ASchwab
DATE	02/03/2016	02/09/2016	02/11/2016	02/12/2016	02/12/2016

OFFICIAL RECORD COPY

List of Attendees

**PUBLIC PHONE CALL BETWEEN STAKEHOLDERS AND THE U.S. NUCLEAR
REGULATORY COMMISSION (NRC) STAFF TO DISCUSS TREATMENT OF MITIGATING
STRATEGIES IN RISK-INFORMED DECISION MAKING**

(CATEGORY 2 MEETING)

January 21, 2016

Name	Organization
Ken Heffner	Certrec
Donald Vanover	ERIN/Exelon
Philip Tarpinian	Exelon
Andrew Bittlemann	EPM, Inc.
Roy Linthicum	Exelon/PWROG
Richard Haessler	Westinghouse Electric Company
Michael Tschiltz	Nuclear Energy Institute
John Lai	NRC/ACRS/TSB
Sunil Weerakkody	NRC/NRR/DRA
Jeff Mitman	NRC/NRR/DRA
Michael Montecalvo	NRC/NRR/DRA
Matthew Humberstone	NRC/NRR/DRA
Alexander Schwab	NRC/NRR/DPR