

Crediting Mitigating Strategies (FLEX\MS) in Risk Informed Decision Making

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OBJECTIVE

- **Update Status of the Project.**
- **NEI White Papers & Staff Review of White Papers.**
- **NRC Staff Overview on NEI White Papers.**
- **Next Steps (Industry Proposal).**
- **Next Steps (Staff Proposal).**

Status Update

- **Held internal stakeholder workshop (Nov. 13th , 2015).**
- **Met with staff and management of key stakeholders in RES, NRR, and NRO who support RIDM (November, 2015).**
- **Received industry white papers (December 2nd , 2015).**
- **Held public meeting (December 9th 2015).**
- **Received NRC staff comments on white papers (Dec.-Jan.)**
- **Held public call with NEI (Jan. 21st).**

RIDM Areas for Potential PRA Credit for FLEX

- 1. Risk-Informed License Amendment Requests**
- 2. Mitigating Systems Performance Indicators (MSPI)**
- 3. Maintenance Rule 10 CFR 50.65 a(4)**
- 4. Accident sequence precursor (ASP) Program**
- 5. Generic Issue Resolution**
- 6. Issue Resolution**
- 7. Rule Making – Regulatory Analysis**
- 8. Significance Determination Process (SDP)**
- 9. Notice of Enforcement Discretion (NOEDs)**
- 10. Incident Response (MD 8.3)**

Commenters

1. NRR\DRA: PRA Operations & Human Factors Branch
2. NRR\DRA: PRA Licensing Branch
3. NRR\DSS: Tech Spec Branch
4. NRR\DIRS: Performance Assessment Branch
5. NRR\DIRS: Reactor Inspections Branch
6. NRR\DPR: Licensing Processes Branch
7. NRR\DPR: Generic Communications Branch
8. RES\DRA: Probabilistic Risk Assessment Branch
9. RES\DRA: Human Factors Branch
10. RES\DRA: Performance and Reliability Branch
11. RES\DE: Generic Issues and Regulatory Guidance Branch
12. NRO\DSRA: PRA and Severe Accidents Branch
13. Region I
14. Region II
15. Region III
16. Region IV

Overview of Staff Comments & NRR\IDRA Views Based on Those Comments



- Received ~ 150 comments from 16 sources.
- The white papers appropriately address large number of issues important to NRC staff in RIDM.
- NEI white papers (after modified to address NRC comments) will provide a framework to streamline a number of RIDM applications.
- There is a need to develop supplemental “application specific guidance,” to bridge the NEI white papers with specific applications (e.g., RASP, IMC 410).
- Staff intends develop a whitepaper and application specific guidance to supplement NEI whitepapers.

Next Steps (Industry Proposal)

- *Comments on white papers from NRC by January 15, 2016 before next RISC meeting.*
- *NEI submittal of final white papers by February 29, 2016.*
- *NRC endorsement of white papers via ISG by April 29, 2016.*
- *Full Draft NEI guidance with PRA considerations to be developed by June 2016.*

Next Steps (Staff Proposal)

For applications that do not require meeting RG 1.200 guidance

- Hold workshop between NRC and industry technical staff to discuss comments (March, 2016).
- Receive revised NEI white papers to NRC (April, 2016).
- Prioritize and develop application specific guidance to supplement white papers.
 - Develop guidance for SDPs, NOEDs, and (likely ASP) within six months after receiving revised white papers from NEI.