

April 29, 2016

MEMORANDUM TO: Stacey L. Rosenberg, Chief  
Probabilistic Risk Assessment Licensing Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

FROM: Leslie C. Fields, Senior Project Manager */RA/*  
Probabilistic Risk Assessment Licensing Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MARCH 16, 2016, PUBLIC MEETING TO  
CONTINUE DISCUSSIONS BETWEEN NUCLEAR  
REGULATORY COMMISSION AND INDUSTRY ON  
PROBABILISTIC RISK ASSESSMENT TECHNICAL ADEQUACY  
WORKING GROUP TOPICS

On March 16, 2016, the U.S. Nuclear Regulatory Commission (NRC) staff held a Category 2 public meeting with the nuclear industry to continue discussions pertaining to Probabilistic Risk Assessment (PRA) Technical Adequacy Working Groups. The meeting participants discussed: 1) Closure of Peer Review Facts and Observations (F&O) Processes; and 2) NEI 16-04 "New Method Evaluation Process Guidelines." The meeting notice was made available at Agencywide Documents Access and Management System (ADAMS) Accession Number ML16064A302.

Closure of Peer Review Findings and Observations (F&O) Processes

Industry mentioned that the criteria in NEI 05-04, "Process for Performing Internal Events PRA Peer Reviews Using the ASME/ANS PRA Standard" will be used to document the F&Os. NRC mentioned that the draft document, Appendix XX, at this time appears very conceptual and does not have sufficient content making it difficult for the staff to provide an informed review and comments. NRC stated that the staff is in the midst of preparing the staff position on how to close F&Os which will be presented to industry at the next public meeting. NRC requested that staff participate as observers in the pilot of the F&O closure process. NEI agreed that NRC observation of the F&O closure process would be useful. There was discussion about how to proceed if a new F&O is identified while performing closure of the F&O. NRC stated that they want to have confidence in the process and that there should be consistency in the results of the F&O closure process regardless of which approach is used; peer review, NRC review, or independent review.

CONTACT: Leslie Fields, NRR/DRA  
(301) 415-1186

NEI 16-04 “New Method Evaluation Process Guidelines”

There was a discussion of the draft document NEI 16-04 “New Method Evaluation Process Guidelines”. NRC mentioned that the draft document at this time appears very conceptual and does not have sufficient content making it difficult for the staff to provide an informed review and comments.

The NRC stated that the current guidance was at a very high-level and did not provide sufficient detail to enable a thorough review or assessment of the process. The NRC observed that there are many subjective terms in the white paper (“substantial;” “simple;” and “obvious”) that make it difficult to determine how the process will function. In particular, the NRC identified the need to have objective criteria established to determine the acceptability of a new method and there was discussion about how this criteria could be established. Some industry members stated that technical acceptability is a decision made by the experts on the vetting panel based on their expertise.

In addition, the NRC noted that Section 3.2 of NEI 16-04 should be more specific and the Figure on page 6 needs to be updated and explained step-by-step. This more detailed description of the process needs to identify what is considered to be the proper review scope and what information needs to be provided to the vetting panel. It was suggested that an annotated outline or template of the detailed contents of the submittal document would be helpful to understand the submittal expectations.

Regarding the members of the vetting panel process, the NRC suggested that some members should be on every vetting panel to ensure panel approaches and decisions are consistent. It was also stated that the vetting panel deliberations should be open, public meetings and thoroughly documented. The initial meeting on a new method should include the purpose, scope, expertise needed, and identified panel members.

There was a general consensus that the pilot experience could provide information to feed back into improving the process, however, more detailed guidance on how the process will be implemented is essential. There was also discussion about which methods are being considered for the pilot process. Industry has identified three potential fire PRA methods for the pilot. The NRC stated that it might be better to include some new methods beyond fires and suggested a couple areas supporting seismic PRA where new methods or refined definitions/clarifications of existing guidance on a method might be a candidate for the vetting panel process. NEI proposed sending a letter to the NRC by the end of the month to request staff participation in the new methods vetting panel pilot process, in addition to providing a draft agenda for the proposed meeting.

The NRC also noted that before new methods are widely used the process needs to be fully completed via formal interactions with the NRC on acceptance of the new method. It is expected that this will occur via a letter transmitting the new method description and vetting panel process results to the NRC for formal review and acceptance. In response to the formal request for acceptance of a new method, the NRC plans to perform an expedited review that leverages the vetting panel process results and respond by letter accepting or rejecting the results of the panel, with any necessary clarifications or qualifications.

In the interim (between the completion of the vetting panel deliberations/results and the formal acceptance by the NRC, there needs to be additional guidance and considerations given the implications of the use of the method. This may involve identifying the new methods in any applications and potentially sensitivity studies on the impact of the new method on the application.

#### Closing Remarks and Public Comments

At the conclusion of the meeting it was decided that the next PRA Technical Adequacy public meeting will be held May 2, 2016, and NRC plans to provide the staff's positions on the F&O closure document prior to this public meeting. NEI stated that they plan to submit comments on the staff's position by May 16, 2016.

An opportunity for public comment was provided near the end of the meeting. No public comments were received. The meeting was then adjourned.

An agenda and list of meeting attendees is enclosed with this memorandum.

Enclosures:

1. Agenda
2. List of Attendees

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2. List of Attendees

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OFFICE	NRR/DRA/APLA	NRR/DRA/APLA	NRR/DRA/APLA: BC
NAME	LFields	ADriver	SRosenberg
DATE	04 / 27 / 16	04/ 27 /16	04 / 29 / 16

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**U.S. NUCLEAR REGULATORY COMMISSION AND INDUSTRY**  
**TO CONTINUE DISCUSSIONS ON**  
**PRA TECHNICAL ADEQUACY WORKING GROUP TOPICS**

**March 16, 2016**

**10:00 a.m. – 12:00 p.m.**

PURPOSE: To continue discussions between the U.S. Nuclear Regulatory Commission and Industry on Probabilistic Risk Assessment (PRA) Technical Adequacy working group topics.

AGENDA:	10:00 a.m. – 10:15 a.m.	Introductions
	10:15 a.m. – 10:45 a.m.	Closure of Peer Review
	10:45 a.m. – 11:00 a.m.	NEI 16-04 “New Method Evaluation Process Guidelines
	11:00 a.m. – 11:15 a.m.	Issued Guidance Revisions
		-Internal Fire Peer Reviews
		-Seismic Peer Reviews
	11:15 a.m. – 11:45 a.m.	Action Items
	11:45 a.m. – 11:50 a.m.	Public Comments
	12:00 Noon	Adjourn

ENCLOSURE 1

PRA TECHNICAL ADEQUACY PUBLIC MEETING BETWEEN NUCLEAR REGULATORY  
COMMISSION AND INDUSTRY REPRESENTATIVES LIST OF ATTENDEES

NRC

S. Rosenberg  
D. Harrison  
M. Drouin  
J.S. Hyslop  
L. Fields  
A. Driver  
D. Stroup  
K.Coyne  
J. Nakoski

Stakeholders

V. Anderson  
P. Amico  
T. Kolb, Ameren  
J. Bretti, Entergy  
C.Littleton, Pilgrim  
C. Nierode, Dominion  
A. Moldenhauer, Dominion  
A. Maioli, Westinghouse  
S. Levinson, AREVA