

Enclosure 2
Credit for MS in Risk-Informed Decision Making
Meeting Summary of 8/11/2016
NRC/Industry Risk-Informed Steering Committee

DATED September 7, 2016

Credit for MS in Risk-Informed Decision Making

BRIEFER: Matt Humberstone

PURPOSE: Inform RISC about the progress of the project and present the scheduled deliverables.

Background:

Following the events at the Fukushima Daiichi nuclear power plant, the NRC conducted a systematic and methodical review of regulations and processes to determine if the agency should make additional safety improvements. As a result of this review, the NRC developed a comprehensive set of recommendations that were developed using, in part, inputs from interested members of the general public, and the industry. These recommendations focused on enhanced mitigation strategies intended to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event (BDBEE). Ultimately, the NRC issued orders to implement the enhanced mitigation strategies mentioned above.

The US nuclear power industry has made various changes to plants (e.g., procurement and sometimes installation of additional components, development of additional procedures, etc.) to address the Commission orders that were put in place. While this equipment was procured specifically to mitigate the effects of a BDBEE, it is realized that the equipment can be used for other functions and could possibly help to mitigate some design basis events as well. PRAs developed for nuclear power plants are expected to reflect the as-built, as-operated plant to the extent possible. As such, where the mitigating strategies developed to comply with the orders can, or will be used by operators to affect the outcome of the scenarios modeled in the PRA, these strategies should be taken into account.

There are a number of regulatory processes where mitigating strategies may be credited in regulatory decision making. Relying on PRA results that have credited mitigating strategies will improve the accuracy of those results, which in turn will enhance the NRC's safety focus. This project is focused on the various challenges in crediting mitigating strategies in future risk-informed decision making in a predictable and reliable manner.

Discussion:

The Risk-Informed Steering Committee (RISC) directed the staff to work with NEI to evaluate how licensees can receive credit in a number of risk-informed decision making (RIDM) areas. To that end NEI developed two white papers to provide guidance to the industry. In December of 2015 the NRC staff held a public meeting to discuss the purpose and scope of the white papers that were provided. NRR staff received comments from NRC staff from the Regions, Office of Nuclear Regulatory Research, Office of New Reactors, and various divisions within NRR during January of 2016. The staff compiled the comments and updated NEI on the status of NRC staff review of the white papers during a public meeting on February 9, 2016.

On March 16, 2016, NRC staff held a public meeting with stakeholders to discuss comments on the white papers (ADAMS Accession No. ML16104A359). Subsequent to that meeting, on May 9, 2016, NEI transmitted two revised white papers now entitled "Qualitative Assessment for Crediting Portable Equipment in Risk-Informed Decision Making," (ADAMS Accession No. ML16138A018), and "Streamlined Approach for Crediting FLEX in Risk-Informed Decision Making," (ADAMS Accession No. ML16138A017). The NRC staff has reviewed the revised

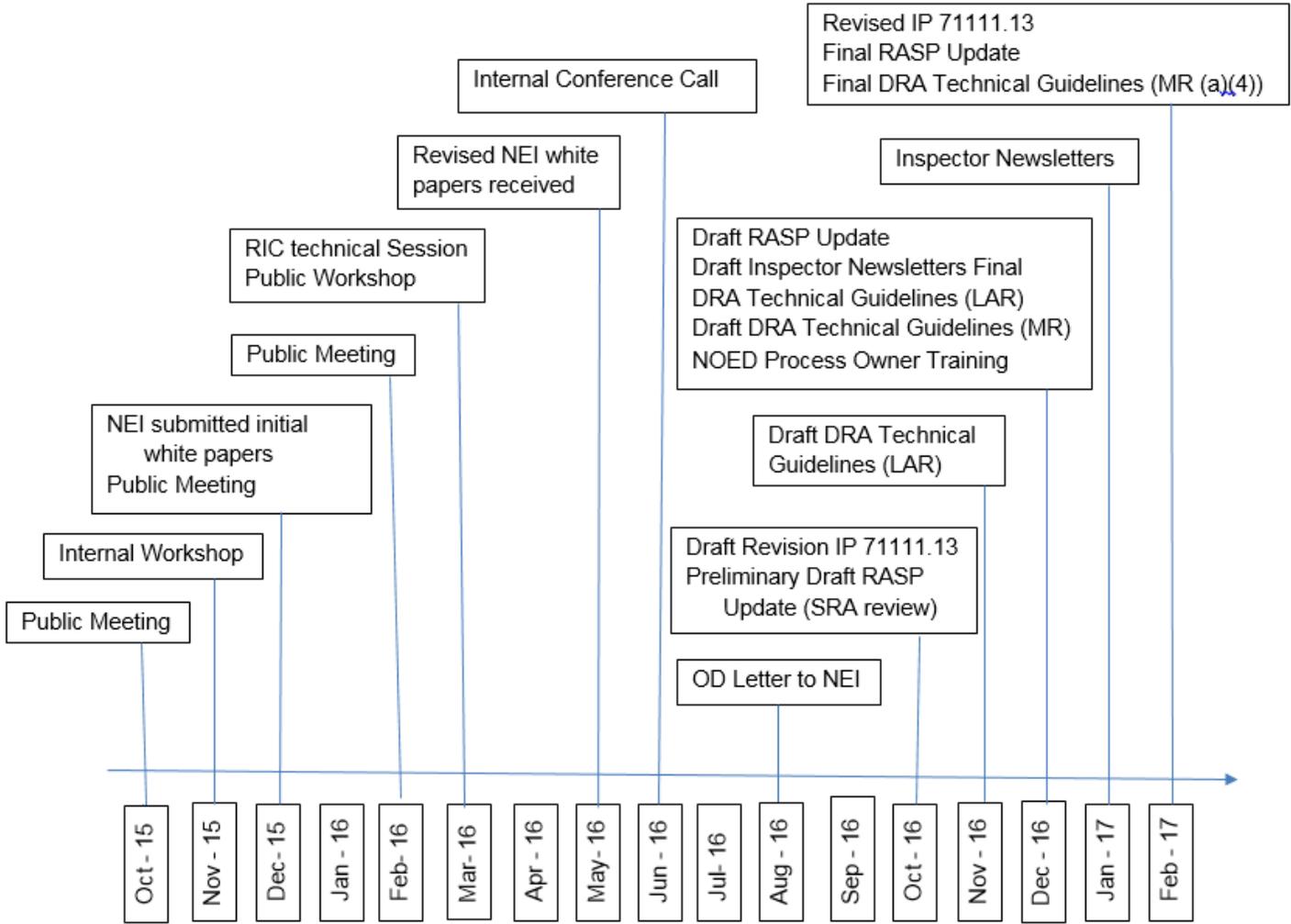
white papers, and concluded that NEI has identified the major areas to be analyzed when seeking credit, such as feasibility in the scenario of interest, equipment availability, reliability, and deployment capability, adequacy of time margin, effectiveness of command and control, and environmental conditions.

On June 9, 2016, an internal NRC conference call was held to discuss the revised white papers and any remaining areas of concern. This conference call was to aid in drafting the letter response from the NRR OD and help understand the technical issues that remained for the staff reviewers. As submitted, these documents do not fall within one of the defined processes for NRC endorsement or approval for use. Although the NRC is not endorsing the white paper, the staff believes they provide high-level guidance to licensees on a process to seek credit in various RIDM processes when they are used in accordance with the application-specific guidance that NRC staff has developed or endorsed. Although the NRC is already allowing credit for mitigating strategies equipment on an ad-hoc basis, the white papers will help guide licensees to perform consistent assessments when seeking credit.

Next Steps

1. Develop or revise application specific guidance for NRC staff in RIDM areas

Credit for MS in RIDM



Crediting Mitigating Strategies (MS) in Risk-Informed Decision Making (RIDM)							
Priority	Topic	NRC Guidance	Deliverable	Responsible Individual	Target Draft Deliverable	Completion Date	Resource Estimate
High			Direct Reports Briefing/ DEDO One Pager	Matt Humberstone/ Mike Montecalvo		Ongoing	NRR - 80hrs
High	Incident Investigation Program (MD 8.3)	RASP Manual MD 8.3					
High	Significance Determination Process (SDP)	RASP Manual IMC-0609 IMC-0308 RIS 2008-15*					NRR - 200hrs RES - 40 hrs
Medium	Accident Sequence Precursor (ASP) Program	RASP Manual	RASP Update	Mike Montecalvo	December-16	February-17	Region - 80 hrs
High	Maintenance Rule a(4) (10CFR 50.65)	RG 1.160 NUMARC 93-01 IP 71111.13	Inspector Newsletter Update IP 71111.13	Matt Humberstone Matt Humberstone/ Ami Patel	December-16 November-16	January-17 April-17	NRR - 40 hrs NRR - 120 hrs
High	Notices of Enforcement Discretion (NOED)		Inspector Newsletter NOED Process Owner Training NRR/DRA Tech Guidelines		December-16 December-16	January-17 December-16	NRR - 40 hrs NRR - 20 hrs
High		IMC-0410		Matt Humberstone	December-16	February-17	NRR - 100hrs
High	Risk-Informed License Amendment Requests (LARs) (Qualitative Credit)	RG 1.200 RG 1.174 RG 1.177 LIC-101 RIS 2008-15	NRR/DRA Tech Guidelines	CJ Fong / Mike Levine	November-16	December-16	NRR - 80hrs
High	Risk-Informed License Amendment Requests (LARs) (Quantitative Credit)	RG 1.200 RG 1.174 RG 1.177 LIC-101 RIS 2008-15	No need to develop application specific guidance	CJ Fong / Mike Levine			
Low	Mitigating Systems Performance Index (MSPI)	RG 1.200 IP 71151	No need to develop application specific guidance	Matt Humberstone			
Medium	Security	RG 5.81	No need to develop application specific guidance	Michael Maley / David Diec			
Low	Regulatory Analysis	NUREG/BR-0058					
Low	Issue Resolution	LIC-504					
Low	Generic Issue Resolution	MD 6.4					