

Industry Feedback on NRC consideration of resumption of rulemaking to decouple Loss of Offsite Power from Loss of Coolant Accidents

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NRC Expectations for Resumption of Rulemaking

- Updated Lead Topical Report (LTR)submittal
 - BWROG has indicated there is no interest in revising and resubmitting a LTR now or in the foreseeable future
 - Conclusions in 2008 remain valid today
 - LTR not cost effective
 - Estimated implementation costs would be prohibitively expensive for benefit to be obtained
 - Additional analysis expectations beyond what has already been done are expensive
 - PRA Technical Adequacy.. Need for upgrade to PRA models.. Internal events update, shutdown, seismic
- Pilot Application
 - PWROG and BWROG have indicated that there is no interest in moving forward with a pilot application.
- Priority
 - Industry believes NRC should devote limited resources in the risk area to complete licensing activities in a predictable and timely manner.
 - NRC's time estimate of 4-5 years to complete rulemaking ... disincentive for pursuing
- Diversion of limited staff resources from higher priority actions
 - Other risk-informed licensing activities have significant industry interest and commitment to implement (10CFR50.69, RITS 4b, RITS 5b)
 - DRA staff should be devoted to these activities as opposed to pursuing LOOP/LOCA rulemaking