

Closure Process for Industry Peer Review Facts and Observations

Risk-Informed Steering Committee

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Independent Assessment F&O Closure Process – Recent Activities

- **January 24, 2017** – Staff performed audit of F&O closure reports for first two Independent Assessment pilots.
- **January 25, 2017** – Staff provided NEI with comments on revised guidance related to audit of F&O closure reports.
- **January 26, 2017** – Staff provided NEI and HNP staff updated guidance to incorporate comments from the audit review of the final F&O closure reports from the previous two pilots held.
- **January 30 – February 1, 2017** – Third industry pilot at different utility using revised guidance.
- **February 1, 2017** – NEI provided updated guidance to the staff with clarifying comments from the third pilot.
- **February 10, 2017** – Staff provided NEI with clarifying comments to address the observations from the third pilot.
- **February 15, 2017** – NEI provided staff with remaining comments to finalize prior to sending final version requesting staff approval.

Pilot Independent Assessment NRC Observations

1. Insufficient guidance for identification and disposition of model upgrades
 - Focused-scope peer review per ASME Standard may still be needed
 - **Resolution:** Guidance includes an assessment of whether the resolution of each F&O was determined to be an upgrade
 - If a concurrent focused-scope peer review is performed, new F&Os may be generated and must be submitted to NRC in LARs

2. Independent Assessment (IA) process guidance prohibits generating and/or documenting new F&Os
 - **Resolution:** NEI guidance instructs that new issues should be documented in the IA Team final report and host utility must follow up

3. F&Os should not be closed with a suggestion stating documentation is incomplete
 - **Resolution:** Guidance includes that any partially closed F&O(s) should still be considered open and submitted to NRC in future risk applications by the licensee

Pilot Independent Assessments

NRC Observations

4. Lack of guidance regarding interim time between IA team's exit meeting and issuance of the final report
 - Can F&Os be considered for closure during this interim time?
 - **Resolution:** Guidance addresses that host utility may provide additional information for closure of open F&Os with IA team to perform separate consensus sessions prior to completion of the IA final report.

5. Insufficient description in final report regarding how resolution of F&O now meets associated Supporting Requirement from PRA Standard
 - **Resolution:** Guidance includes:
 - Identification of the impacted SRs, including SRs that reference another SR
 - Description of why an SR was not met and why SR has now been met

Path Forward

- Industry pilots with NRC staff observation resulted in closely converging on acceptable closure guidance
- A few remaining issues may be discussed in acceptance letter
 - F&O closure contingent upon close adherence to guidance
 - staff will continue to audit individual licensee F&O closure reviews for ongoing monitoring.
 - acknowledge the staff's current definition of new methods. Further assessment of the definition of New Methods is currently being addressed in the "Evaluation of New Methods Process" WG. Any updated RG 1.200 revision and staff endorsement will supersede the approval letter for this F&O closure process.
- Staff recently provided comments on the updated guidance to address auditing of reports and the third pilot observations. NEI indicated these comments will be accepted.

Path Forward Schedule

Late February 2017 – NEI to provide final guidance on F&O closure process.

April/May 2017* – NRC to issue “letter” on acceptability of F&O closure process followed by ISG or other regulatory endorsement method

**Milestone date contingent upon the alignment of industry generic guidance with NRC staff regulatory position*