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MEMORANDUM TO: File

FROM: Joseph Giitter, Director /RA/  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: RISK ASSESSMENT STANDARDIZATION PROJECT (RASP)  
HANDBOOK, VOLUME 1, UPDATE TO SECTION 6: MODELING  
RECOVERY AND REPAIR TO CREDIT FLEX STRATEGIES

The purpose of this memorandum is to document completion of the Risk Assessment Standardization Project (RASP) Handbook, Volume 1, update to Section 6, entitled, "Modeling Recovery and Repair to Credit Flex Strategies."

The RASP Handbook documents methods and guidance that NRC staff should use to achieve consistent results when performing risk assessments of operational events and licensee performance issues. It is a "best-practices" document that provides technical guidance on methods used for risk assessment. When assessing the significance of findings incorporating alternate mitigating strategies using the method and/or guidance provided in the RASP Handbook, the complexity of those findings may require Senior Reactor Analysts (SRAs) to deviate from the RASP Handbook guidance. For those instances where the RASP Handbook does not provide specific guidance or where the guidance is not applicable to a particular situation, the staff has the flexibility to use the best available information, e.g., inspection results or engineering judgement, to come up with the most appropriate model. In such instances, SRAs are requested to document the basis for the deviation to allow for the ease of peer review.

On November 7, 2016, NRR/DRA/APHB requested NRC's Regional Offices and the Office Nuclear Regulatory Research (RES) to review a proposed update to Volume 1, Section 6 of the RASP Handbook (ADAMS Accession No. ML17192A441). Subsequent to that, NRR\DRA\APHB staff held a number of discussions with cognizant staff in the Regional Offices and RES to solicit their views and comments. After reviewing the comments, NRR\DRA\APHB staff revised the proposed update to Section 6 of Volume 1. A redline strikeout version of the updated RASP guidance is attached to this memorandum as Enclosure 1. The summary of the comments received and the resolution of those comments is attached to this memorandum as Enclosure 2.

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This updated RASP Handbook guidance provides best-practices. We recognize, however, there are number of unresolved challenges (e.g., limited operating experience, modeling challenges) associated with crediting FLEX strategies within the time constraints imposed on SRAs and risk analysts in the Office of Nuclear Reactor Regulation (NRR). Therefore, the decision to provide credit for alternate mitigating strategies that are not explicitly modeled in the subject plant's SPAR model is up to the analyst based on, but not limited to, the factors expanded on in this revision.

Enclosures:

1. Update of RASP Handbook Volume 1, Section 6
2. RASP Handbook Update Comment Resolution

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Enclosures:

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**ADAMS Accession No: ML17192A435 PKG: ML17192A412**

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