

**RELATIONSHIP BETWEEN NEI 01-01,  
DRAFT NEI 16-16 AND  
DRAFT NEI 96-07 APPENDIX D**

Public Meeting

August 1<sup>st</sup>, 2017

NRC Staff

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# KEY MESSAGES

1. Staff seeks alignment with NEI on interpretation of guidance regarding 10 CFR 50.59 Criterion VI
2. Unclear how draft Appendix D and draft NEI 16-16 can be used together for 50.59 Screenings and Evaluations
3. Understanding how Draft NEI 96-07 Appendix D and NEI 16-16 will replace and improve upon NEI 01-01 (e.g. 12 Staff concerns) (time permitting)
4. NEI's stated guidance replacement path forward and actual NEI 16-16 and Appendix D content not clear (time permitting)

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# Mapping Between Appendix D and NEI 16-16

- What aspects of NEI 16-16 can be applied to Appendix D?
  - Screening guidance?
  - Evaluation guidance?
- Consistency of terminology and concepts
  - “CCF Susceptibility Analysis”, “Credible”
- Compatibility of technical information
  - Bounding concepts and methodologies
- Appendix D and NEI 16-16 appear closely tied to together – It is essential that these relationships are clearly described and demonstrated to Staff

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# CCF Credibility/Likelihood Determinations

- **Draft NEI 16-16 Credibility Determinations (50.59s & LARs)**
  - CCF Not Credible (pg. 5)
  - CCF Credible & Beyond Design Basis (pg. 5)
  - CCF Credible & Within Design Basis (pg. 9)
- **Draft Appendix D Credibility Determinations (50.59s only)**
  - CCF Not Credible (pg. D-24)
  - CCF Credible But Not Attributable (pg. D-27, D-35)
  - CCF Credible But Negligible (pg. D-29)
  - CCF Credible (pg. D-24)
- **NEI 01-01 Likelihood Determinations (50.59s only)**
  - Not more than a minimal Increase in Likelihood of Malfunctions (pg. 4-16)
  - Likelihood of Failure is Sufficiently Low Likelihood (pg. 4-20 )

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# Summary of Concerns with NEI 01-01

- Previously identified staff concerns (ADAMS Accession# ML13298A787)
- On June 15, 2016, NEI presented a summary table that individually mapped certain staff concerns to a successor document to NEI 01-01 (ADAMS Accession# ML16166A338)
- Staff wants to ensure this framework is still up to date

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## DRAFT APPENDIX D AND DRAFT NEI 16-16

- Based upon a review of July 2014 letter from NEI ([ML14182A579](#) & [ML14182A578](#)) its not clear how Appendix D and NEI 16-16 replace the licensing and technical guidance of NEI 01-01
- NEI 16-16's main focus is CCF which was ***not*** made clear to staff prior to reception of the draft.
- Appears to be a delta between technical content of NEI 16-16 and NEI 01-01
- Appendix D does not appear to carry forward all licensing aspects from NEI 01-01.