

# Probabilistic Fracture Mechanics Technical Letter Report Discussion

## Meeting Purpose

Remarks by

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PFM Public Meeting  
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# Background

- December 12, 2017 – PFM Public meeting
  - Purpose to discuss draft TLR on PFM (ML17353A170)
- December 19, 2017 – NRC received EPRI questions on TLR
- January 10, 2018 – NRC sent responses to questions to EPRI
- February 27, 2018 – Management call – This TLR was discussed
- Overall consensus was EPRI did not think Question #2 was adequately addressed

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## Question 2

- Q2: The Technical Letter Report (TLR) identifies several EPRI MRP reports that the NRC had difficulty in reviewing. Some of these reports, such as MRP-335, seem to clearly address the aspects identified in the TLR as being needed to establish confidence in a PFM application. Can the NRC provide an example list of documents that the NRC believes were inadequate from a PFM perspective and clearly articulate a list of the NRC's perceived shortcomings for each document?
- NRC Response: Many past industry submittals have included PFM analyses. These analyses were not directly used by NRC as the sole factors in regulatory decision making. Instead the NRC staff used the probabilistic analyses in combination with deterministic analyses to confirm reasonable assurance of the acceptability of the application. Some issues that have been identified in past PFM submittals include incomplete uncertainty characterization, lack of review of the PFM code, incomplete PFM code technical basis, incomplete code V&V, lack of acceptance criteria for the PFM code and analyses, and ignoring the tenets of risk-informed decision making.

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# Public Meeting Purpose and Agenda

- Purpose: To discuss a sampling of reports that utilized PFM and compare the contents to the staff position on PFM
- Agenda:
  - NRC Perspective – Steve Cumblidge
  - Discussion of Reports containing PFM – All
  - Industry perspective – or continued discussions