



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 18, 2018

MEMORANDUM TO: Douglas A. Broaddus, Chief  
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: G. Edward Miller, Project Manager */RA/*  
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JUNE 18, 2018, PUBLIC MEETING WITH  
NUCLEAR ENERGY INSTITUTE REGARDING PROBABILISTIC  
RISK ASSESSMENT CHANGE CONTROL PROCESS

On June 18, 2018, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting<sup>1</sup> with industry representatives including staff from the Nuclear Energy Institute (NEI), NextEra, and the Pressurized Water Reactor (PWR) Owners Group. The purpose of the meeting was to discuss licensee control over the development of new methods for use in their probabilistic risk assessment (PRA) following approval of an amendment to implement, for example, a risk-informed completion time (RICT) program. Specifically, the meeting was to discuss an NEI proposal for how new PRA methods would be controlled (i.e., accepted for use) after receipt of a program that uses quantitative PRA results to control regulated activities. This issue includes determining when a change in PRA methods would require a licensee to seek regulatory approval prior to implementation of the methodology.<sup>2</sup>

During the meeting, the NRC staff presented slides that provided initial feedback on NEI's proposal.<sup>3</sup> Specifically, staff informed industry representatives that (a) in light of direct influence of quantitative results generated by PRA models to self-approve, for example, substantial extensions in technical specification completion times, and (b) other concerns such as potential tacit approval of new methods, the NRC staff does not understand how the license condition proposed by NEI would adequately control PRA methods within the existing licensing and oversight infrastructure. The staff agreed with the industry that peer reviewers should be able to review, accept, and report new methods using guidance provided in Regulatory Guide (RG) 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results For Risk-Informed Activities." The discussions, however, highlighted a difference in interpretation of "accept" between staff and industry. The NRC staff interprets accept as reasonable to the peer review team while the industry interprets accept in the more formal sense that the NRC staff may not question the adequacy and use of the method to support future regulatory decisions.

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<sup>1</sup> The original meeting notice is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML18150A200.

<sup>2</sup> The NEI proposal is available under ADAMS Accession No. ML18124A307.

<sup>3</sup> The NRC slides are available under ADAMS Accession No. ML18169A160.

The NRC staff noted several enhancements that would need to be incorporated to next revision of the American Society of Mechanical Engineers/American Nuclear Society (ASME/ANS) PRA Standard and/or next revision of RG 1.200 to support this activity. During the presentation, NEI representatives stated that control of new methods through industry peer review was the only viable option, and that in NEI's view, there is no stated requirement or expectation that the NRC approve or accept any individual methods used in a licensee's PRA in existing regulatory requirements or regulatory guidance for risk-informed regulation in general. The NRC staff agreed that the current risk-informed regulatory guidance can be enhanced about how new methods are accepted, but that the guidance clearly allows for different expectations on PRA technical adequacy for different risk-informed applications. The NRC staff stated that it was unclear how the current regulatory infrastructure (licensing and oversight) could systematically incorporate the industry proposal for a time-limited, negative consent staff acceptance of the peer reviews conclusions on the adequacy of new methods. The NRC presentation also provided a timeline for revision of existing guidance to develop and implement a licensing and oversight infrastructure that incorporates PRA methods.

After the NRC presentation, NEI staff presented slides that provided additional clarification on their proposal.<sup>4</sup>

No regulatory decisions were made and both the NRC staff and the NEI indicated that they would consider the items discussed in the meeting. It was agreed that further interaction would needed to continue discussion of this topic.

Following the discussion, an opportunity was afforded to any other participants who wished to ask questions or make comments. No questions or comments were received in the meeting.

Enclosure:  
List of Attendees

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<sup>4</sup> The NEI slides are available under ADAMS Accession No. ML18169A418.

SUBJECT: SUMMARY OF JUNE 18, 2018, PUBLIC MEETING WITH NUCLEAR ENERGY INSTITUTE REGARDING PROBABILISTIC RISK ASSESSMENT CHANGE CONTROL PROCESS DATED JULY 18, 2018

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