

NRR-DMPSPEm Resource

From: Miller, Ed
Sent: Tuesday, May 14, 2019 10:10 AM
To: ANDERSON, Victoria
Subject: Slides for May 16 Public Meeting
Attachments: Mary May 16 2019.pdf; Sunil May 16 2019.pdf

Victoria,
Attached are the slides that the NRC staff plans to present at the meeting this Thursday. Please let me know if you have any issues opening the attached files. Thanks.

Ed Miller
301-415-2481

Hearing Identifier: NRR_DMPS
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Subject: Slides for May 16 Public Meeting
Sent Date: 5/14/2019 10:10:00 AM
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MESSAGE	220	5/14/2019 10:09:00 AM
Mary May 16 2019.pdf	253840	
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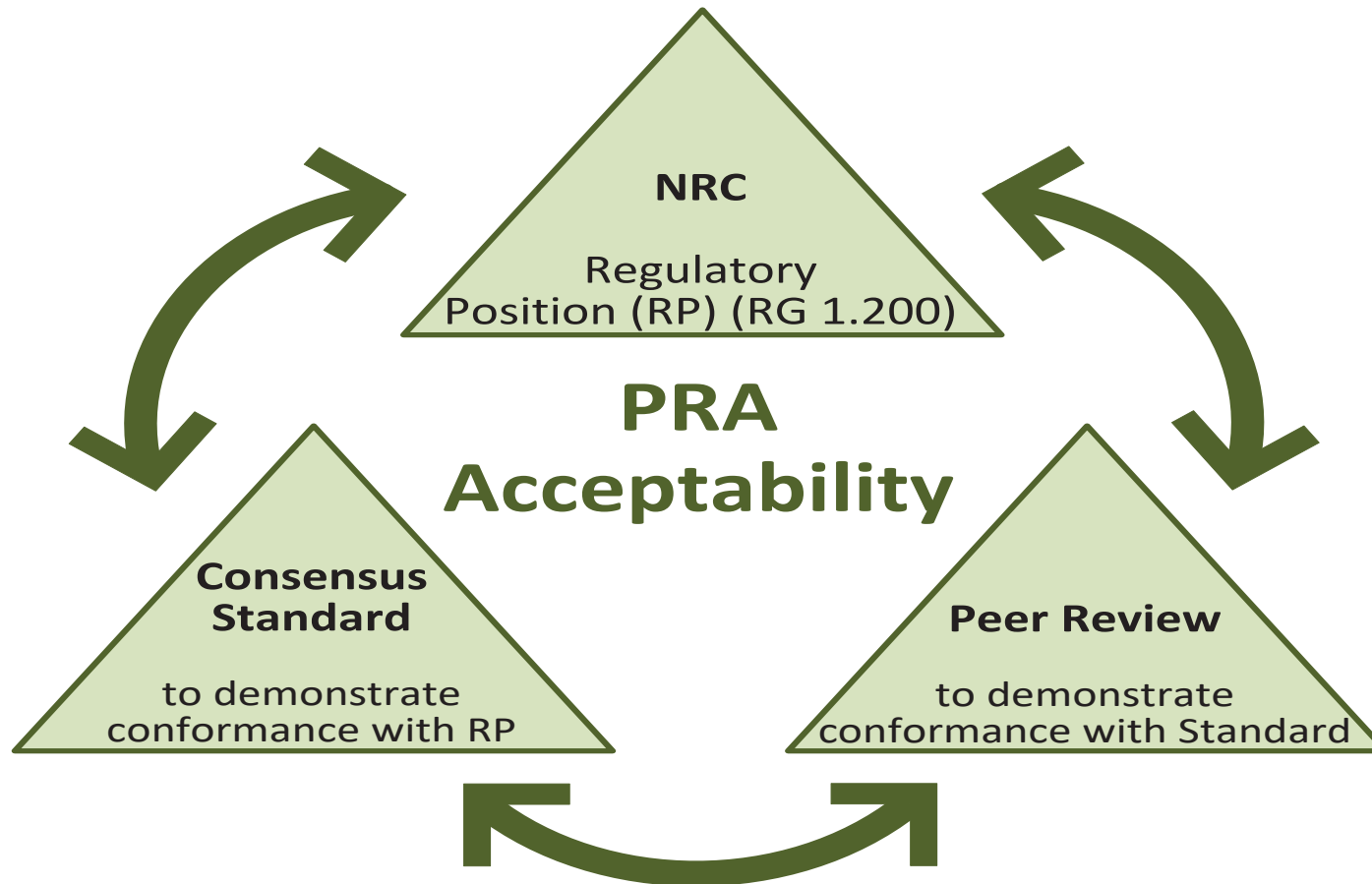


“Revision 3 of Regulatory Guide 1.200”

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May 16, 2019

NRC RG, ASME/ANS Standard, NEI Guidance

All three must work together



OUTLINE

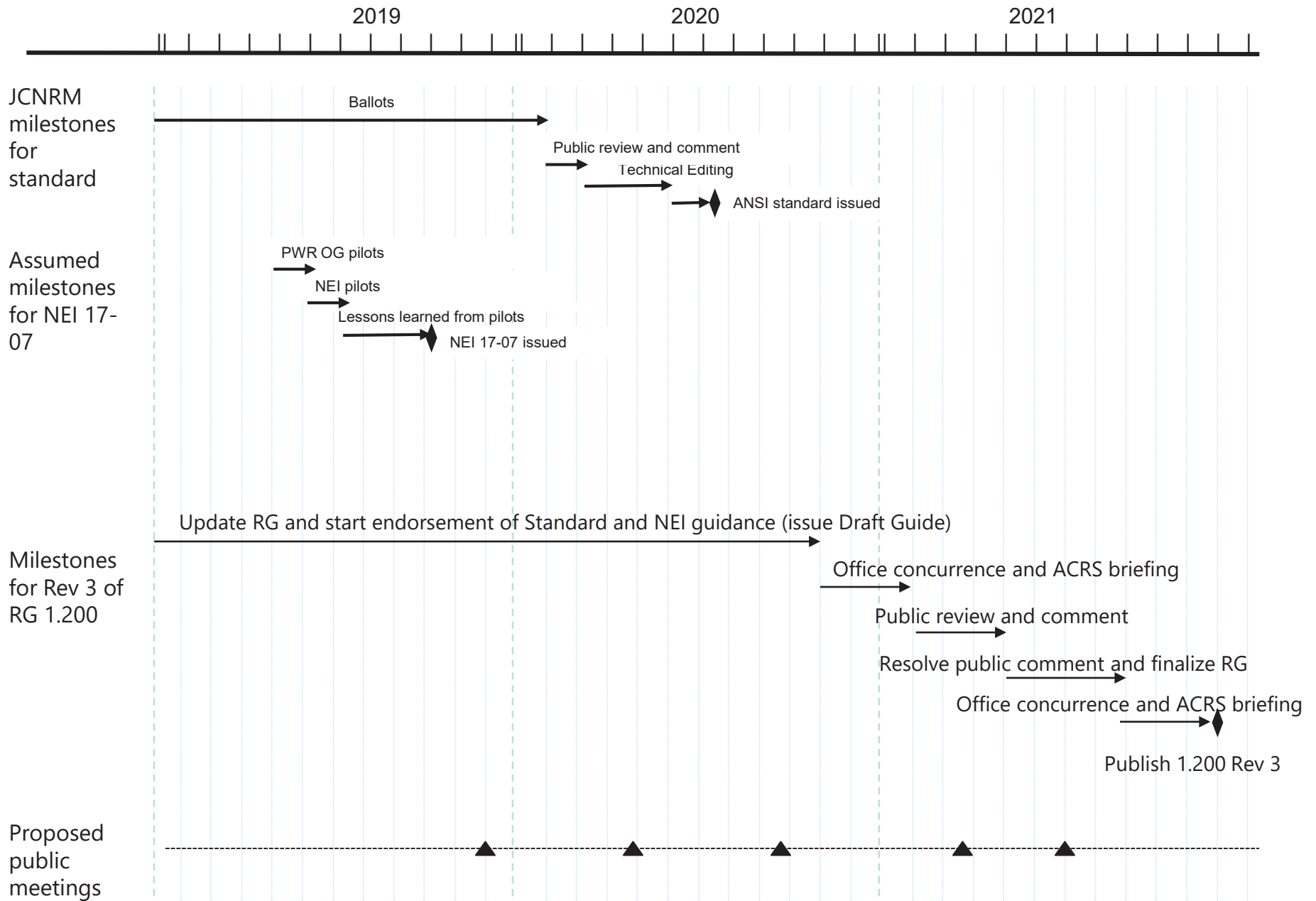
- Changes to RG 1.200
- Schedule and timeline milestones
- Path forward

PROPOSED CHANGES TO RG 1.200 (1/2)

- Purpose of the changes is to provide further clarity and to make the process more efficient
- Changes primarily involve
 - Terminology
 - PRA upgrades and associated peer review
 - Newly developed methods and associated peer review
- Scope of RG just for LWRs, a separate RG for non-LWRs

PROPOSED CHANGES TO RG 1.200 (2/2)

- Revising C.1 – A Technically Acceptable PRA
- Revising C.2 – Consensus PRA Standards and Industry PRA Programs
- Updating C.3 – Demonstrating the technical adequacy of a PRA used to support a regulatory application
- Updating C.4 – Documentation to support a regulatory submittal
- Adding C.5 – Glossary
- New Appendix A – Staff endorsement of the new edition to the LWR PRA standard
- New Appendix B – Staff endorsement of NEI 17-07



Path Forward

- Complete preliminary draft of any staff objections to RG 1.200 in fall of 2020
- Complete staff review of NEI 17-07 for endorsement in RG 1.200
- “Formal” initiation of Revision 3 to RG 1.200 will start with publication of new edition to ASME/ANS PRA standard
 - Issue draft guide for public review and comment
 - Hold public meetings
 - Finalize and publish Revision 3



**Status, Challenges, and Next Steps to Disposition Issues
relating to Newly- Developed Methods
May 16, 2019**

Sunil Weerakkody, Sr. Technical Advisor, NRR\DRA
Mehdi Reis-Fard, Team Leader, NRR\DRA\APLB\R11
Stacey Rosenberg, Chief, NRR\DRA\APLA
Antonios Zoulis, Acting Chief, NRR\DRA\APOB
Mary Drouin, Senior Program Manager, RES\DRA\PRB

(Excerpt from the Public Meeting in November 2018)

Staff intends to develop plans for closure for long-term and short-term deliverables to disposition the new methods issue (NRC's goal is to prepare plans AND plan and complete items 2, 3, and 5 within about an year. Large number of other high-priority items which require PRA expertise or limitations on staff's ability to make changes without Commission approval may challenge that goal).

1. Formalize plans to endorse NEI-17-07. (Task 1).
2. Prepare plan to issue letter that documents the subset of issues that will be published in RG 1.200 which are important to address new methods issue. (Task 2).
3. Prepare plan to implement NEI alternative by developing or adjusting NRC's internal procedures\processes. (Task 3). {Conditional to NRC-wide approval of NEI proposal}
4. Formalize plan to update RG 1.200. (Longer Term)(Task 4).
5. Finalize plan to enhance ROP frame work to support risk-informed initiatives. (Longer Term) (Task 5).

Desired Outcome (**Excerpt from Public Meeting in November 2018**)
NRC View: Products & Experiences that Constitute Success

- A framework that permits the Industry to implement Newly Developed Methods in a manner that is acceptable to the NRC staff.
- Revised ASME\ANS PRA Standard contains information that enables peer-reviewers to review Newly Developed Methods in a manner acceptable to the staff.
- Revised Regulatory Guide 1.200 has endorsed the Revised ASME\ANS Standard with appropriate clarifications.
- Inspections rarely identify PRA methods unacceptable to the staff, which by themselves, or in combination with other related issues have potential adverse safety impacts.
- In the event a concern with a method is identified during an inspection, the issue is resolved without undue burden to licensee or staff.

OUTLINE & OBJECTIVE

Objective:

Provide a summary of status update and next steps.

Status Update:

- Task 1 (NEI 17-07)-Mehdi Reisi-Fard, Team Leader, PRA Licensing Branch B, Risk-Informed Initiatives Team, NRR\DRA
- Task 2 (PWROG report)-Stacey Rosenberg, Chief, PRA Licensing Branch A, NRR\DRA
- Task 3 (NRC infrastructure)-Sunil Weerakkody, Senior Level Advisor, NRR\DRA
- Task 4 (Revision to RG 1.200)-Mary Drouin, Senior Program Manager, RES\DRA
- Task 5 (Enhancing ROP framework)-Antonios Zoulis, Acting Chief, PRA Operational Support Branch, NRR\DRA

Review NEI-17-07 for Acceptance, (Task 1)

Status Update:

- NRC staff published Task Plan (ML18330A056) (11/20/2018).
- NRC staff held several internal meetings and followed up with NRC\NEI tele-conferences.
- NRC staff provided comments on draft NEI-17-07.
- NEI published draft version of NEI 17-07 for piloting (ML18352B305) (12/08/2018).
- Pilots scheduled for late May.

Review NEI-17-07 for Acceptance (Task 1) (Cntd.)

Next Steps (plan to be completed during FY 2019):

- Schedule and hold pilots (NEI, OGS, NRC) (Mar-May).
- Provide comments to NEI-17-07 using pilots (NRC) (June).
- Update NEI 17-07 to incorporate NRC comments (NEI) (July).
- Accept NEI 17-07 for use (NRC), if necessary with qualifications and clarifications (July).

Status of Tech Reviewed Relating to Tech Spec 4b Initiative

- NRC staff is continuing its reviews of Tech Spec 4b submittals.
- NRC staff has issued three Safety Evaluations:
 - Vogtle Units 1, 2 (ADAMS No. ML15127A669)
 - Calvert Cliffs Units 1, 2 (ADAMS No. ML18270A130)
 - Turkey Point Units 3 & 4 (ADAMS No. ML18270A429)
- NRC staff lifted suspension on TSTF 505 (ML18267A259.) (11/21/2018)
- List of license amendment request (LARs) under review:
 - St. Lucie Units 1 & 2
 - Palo Verde Units 1, 2, 3
 - Farley Units 1 & 2
 - Limerick Units 1 & 2
 - Byron Units 1 & 2
 - Braidwood Units 1 & 2

Review PWROG Report to determine Acceptability (Task 2)

Status Update

- NRC staff Published Task Plan (ML18352B131)(12/18/2018).
- PWROG\NRC held several workshops.
- PWROG published draft report for piloting (ML19025A037)(01/25/2019).
- Pilots scheduled for late May.

Review PWROG Report to determine Acceptability (Task 2) (Cntd.)

Next Steps (plan to be completed during FY 2019):

- Schedule and hold pilots (NEI, OGS, NRC)(Mar-May).
- Provide comments to PWROG draft report (NRC)(June).
- Incorporate NRC comments (PWROG) (June).
- Transmit PWROG report to JCNRM (PWROG).
- Accept PWROG report for use (NRC), if necessary with qualifications and clarifications (July).

Test acceptability and viability of framework proposed in NEI Alternative (Task 3)

Status:

- NRC staff Published Task Plan (ML18355A435) (12/21/2018).
- NEI transmitted proposal for an Administrative Tech. Spec. (ML19080A041) (03/20/2019).
- Drafted document that articulates regulatory frame work and role of peer-review.
- Disseminated NEI proposal and held number of meetings with cognizant staff in various divisions and offices (RES\DRA, NRR\DSS, NRR\DE, NRR\DIRS, NRR\DORL, RES\DRA) (Ongoing).
- Estimated budgetary implications associated with NEI proposal.
- Completed a review of applicable Commission Communications, Licensing & Oversight strategies for four recent risk-informed initiatives.
- Drafted DRA divisional instruction to enable an expeditious review of pending peer-review reports using SMEs for piloting (undergoing DRA branch chief review).

Test acceptability and viability of framework proposed in NEI Alternative (Task 3) (Contd.)

Next Steps

- Revise NRC Published Task Plan (ML18355A435).
- Provide initial feedback on NEI transmitted proposal for an Administrative Tech. Spec. (ML19080A041)
- Complete document that articulates regulatory frame work and role of peer-review (undergoing OGC review)
- Continue “socializing” and receiving feedback on NEI proposal.
- Complete draft DRA divisional or an Office Instruction to enable an expeditious review of pending peer-review reports for piloting.

Task 3 (Next Steps- during FY 2019) (Cntd.)

- Implement essential short-term changes to accommodate need to pilot proposed admin Tech Spec in the event NRC staff approves the Tech Spec (ROP enhancement is a longer-term project).
- Pilot draft instruction on NRC reviews of peer-review reports.
- Request NRC-wide formal review of NEI's proposed administrative technical specification.
- Provide final feedback to NEI on the administrative technical specification using NRC-wide formal comments.
- Provide formal NRC staff approval to NEI proposal (assuming agency-wide endorsement of the proposal).

Enhancing ROP Framework (Task 5)

- Three enhancements:
 - ROP Enhancements (SECY under preparation to Commission, High-Level, not relevant to newly-developed methods issue).
 - ROP Enhancements to support Regional RIDM (ongoing, relevant to all risk-informed initiatives).
 - Evaluation of inspection procedures and enhancements under consideration (ongoing, directly relevant all risk-informed initiatives).”

Considerations in developing recommendation on the NEI proposal on Admin Tech Spec

- The risk-informed performance-based nature of the inspection program must be maintained:
 - Evaluate circumstances that may require a detail inspection of the model.
 - Align on what constitutes “minor” vs “more-than minor” violations.
 - Understand aggregate impacts of licensee’s use of methods which by themselves or in concert with other methods or key assumptions may have adverse impacts on public safety.
 - Align on example performance deficiencies (i.e., there must be clearly enforceable requirements in the event of the application of unacceptable methods).
 - Disposition potential findings without expending significant licensee or NRC resources.

Next Steps (beyond FY 2019)

1. Support a timely update to ASME/ANS PRA Standard.
2. Update RG 1.200.
3. Enhance ROP frame work to accommodate needs of risk-informed initiatives.