TAR Safety Significance Determination - Quick Reference Guide, Background, and Basis
(ADAMS Accession No. ML19302F391)

A documentation template is provided separately in ADAMS Accession No. ML19302F568

Quick Reference Guide

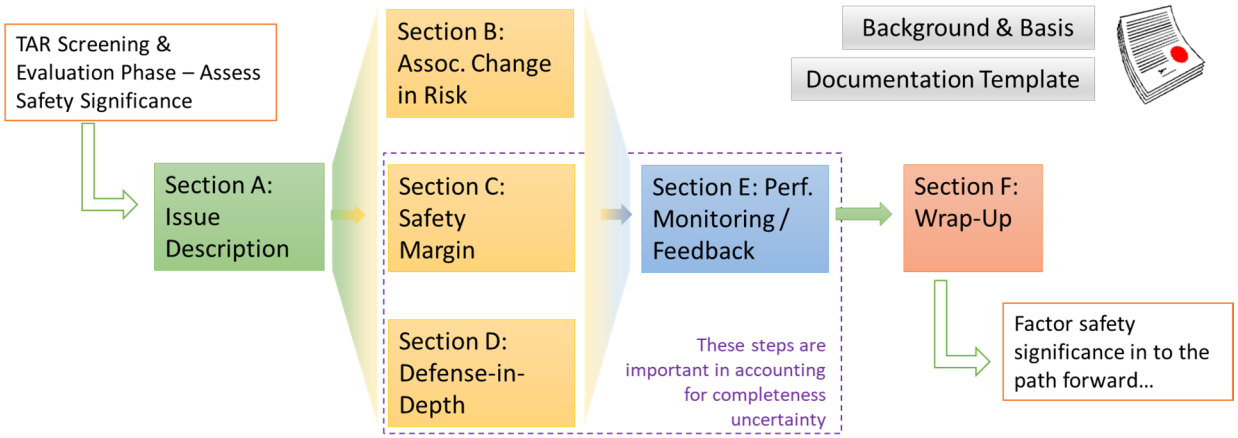


Figure 1: Overview of the Worksheet Process

Guidance regarding purpose, workflow, peer review, etc., is provided in the Background & Basis section, which immediately follows this quick reference guide.

Section A – Issue Description:

Some aspects of issue characterization will already be documented as part of the overarching process that led to this significance determination (e.g., the intake form from NRR Office Instruction COM-106). Use the associated safety significance determination template (contained in the same ADAMS package) to document basic information about the issue. This step relies on good communication at multiple steps as discussed in the Background & Basis.

Section B – Associated Change in Risk

Using one of the following approaches as a guide, document the basis for why there would be, or would not be, a significant increase in risk to the public, should the issue be dispositioned without further action.

> ***Approach B1 – Inspection Guidance / IMC 0609*** *(preferred approach)*
> *Approach B2 – Risk Triplet Discussion*
> *Approach B3 – Scoping PRA Estimate*

Each approach is described further in the Background & Basis document. This stage of the process should lay the groundwork for identifying those elements of plant response that are and are not captured by the evaluation of the change in risk, thus establishing where overlaps in the risk, safety margin, and defense-in-depth evaluations exist. Alternatively, if it can be shown that there is no identifiable increase in risk, or a decrease in risk, associated with the issue, that should be documented in lieu of, or in conjunction with, following one of these approaches.

Section C – Safety Margin

Using one of the following approaches, and specifically considering the extent to which the assessment of risk significance informs the present element, document the basis for why there would, or would not be, significant erosion of safety margin in risk-significant SSCs or plant capabilities, should the issue be dispositioned without further action.

> ***Approach C1 – Risk Triplet*** *(preferred approach)*
> *Approach C2 – 50.69 Categorization*
> *Approach C3 – LIC-504, Revision 5, Appendix E, Section 2.3*

Each approach is described further in the Background & Basis document. The analyst needs to make a distinction between instances where degradation of engineering margin impacts the overall finding that the facility poses no undue risk, versus instances where it does not. The integration of safety margin with risk information and defense-in-depth is the means of making this more holistic assessment. Erosion of safety margin already adequately captured by the risk assessment should be documented here, but not "double counted." Alternatively, if the risk assessment adequately captures all significant elements of safety margin, that should be documented in lieu of, or in conjunction with, following one of these approaches.

Section D – Defense-in-Depth:

Using one of the following approaches, and specifically considering the extent to which the characterization of risk significance and safety margin has informed the present element, document the basis for why there would be, or would not be, significant erosion of defense-in-depth should the issue be dispositioned without further action.

> ***Approach D1 – Regulatory Guide 1.174, Rev. 3, Section 2.1.1.3*** *(preferred approach)*
> *Approach D2 – 50.69 Categorization*
> *Approach D3 – 50.69 Guidance - NEI-00-04, Revision 0, Section 6*

Each approach is described further in the Background & Basis document. The degree to which defense-in-depth should be viewed as something that is being established (a licensing perspective) versus something that is being eroded (an oversight perspective) will depend on the nature of the issue. Limitations in the risk assessment should be considered in the assessment of defense-in-depth. Conversely, facets of defense-in-depth erosion already adequately captured by the risk assessment (e.g., general common-cause failure mechanisms, a particular electrical board being required for successful operation of multiple pieces of equipment) should not be "double-counted." Alternatively, if the risk and safety margin assessment adequately captures all significant elements of defense-in-depth, that should be documented in lieu of, or in conjunction with, following one of these approaches.

Section E - Performance Monitoring / Feedback:

Using one of the approaches below, document the basis for why there would be, or would not be, sufficient performance monitoring (feedback) opportunity via other mechanisms inherent in the situation. To be relevant, these feedback mechanisms would need to reasonably reveal to

the NRC staff significant mistakes in judgment associated with dispositioning the issue without further action, prior to an unacceptable outcome.

> ***Approach E1 – Oversight***
> *Approach E2 – Regulatory Reporting*
> *Approach E3 – A more generic feedback mechanism*
> *No feedback opportunity*

Put differently, if a determination to sunset the issue is reached, and if that determination turns out to be ill-founded, are there feedback mechanisms that will re-focus the agency's attention on the issue? This step is not intended as an opportunity to leave the issue open beyond its disposition, but rather to arm the decision maker with the knowledge of whether this type of feedback exists.

Section F – Wrap-up:

Prior to making a determination, document the known sources of uncertainty (parameter, modeling, and/or completeness) that have not been captured in the foregoing documentation and would be expected to significantly influence the foregoing evaluation. The purpose of doing this is not to drive the outcome, but rather to ensure that future readers remain aware of the associated uncertainties at the time the determination was reached.

Based on the totality of the foregoing information, and from the perspective of whether the agency should expend significant additional resources investigating this issue (versus other issues), document whether the issue has apparent safety significance in each of the assessed areas. The documentation template offers suggested language.

If the issue was judged to be clearly of very low safety significance,[1] it should be recommended for disposition on the basis of this evaluation. If one or more "does not" entries have been selected, the issue may still be of very low safety significance, but a higher level of buy-in amongst the integrated team may be needed to disposition the issue on the basis of this evaluation.

Separately, if the assessment cannot conclude that the issue is of very low safety significance, yet it is apparent that the issue does not have sufficient significance to meet the Safety Goal Evaluation criteria in NUREG/BR-0058, Draft Revision 5 (Section 2.4, and Figure 2-3 therein), this should be documented. The intent is to document cases where it is clear how such an evaluation would turn out, so as not to lose that insight. In some cases, the TAR safety significance evaluation will not provide sufficient information to draw a conclusion in this regard. While exploration of the issue would nominally proceed, this additional information may guide the level-of-effort later, should it become evident that the issue is likely outside of the current licensing basis.

[1] It is acknowledged that differing agency processes use differing terminology with respect to safety significance. Here, very low safety significance is generally intended to mean a level of safety significance where the agency would be unlikely to take further regulatory action or require additional assurance. Relative to processes that use a binary description of safety significance (e.g., 10 CFR 50.69), this would be the lower bin. Relative to processes that use a tertiary (or higher) description of safety significance (e.g., IMC 0609, LIC-504), this worksheet would view very low safety significance to be the lowest of these bins.

The above assessment should reflect an **agreement between the risk analyst and the topical area subject matter expert**. If alignment cannot be reached, the safety significance should be considered indeterminate, or alignment should be sought by engaging the integrated team. If others involved in the assessment have a differing view, that should be communicated to the integrated team but otherwise pursued through the agency's broader differing views process.

Background & Basis

General:

- Purpose - The purpose of this worksheet is to guide a structured approach to assessing the safety significance of an emergent plant-specific issue that has entered the TAR process. It guides the involved staff in considering the right facets, engaging the right counterparts (e.g., the requesting office, the TAR integrated team), and documenting the right considerations. It envisions a level-of-effort and level-of-rigor that is more than a "back of the envelope" or "value judgment" exercise, but less than a LIC-504 evaluation,[2] a Regulatory Guide 1.174 evaluation, or a Significance Determination Process detailed risk evaluation. The ultimate decision on whether an item has sufficient safety significance to warrant further agency resource expenditure necessarily requires judgment.

- Desired outcome - A completed and documented analysis that has engaged the issue owner up-front, considered real-time feedback from the broader integrated team, and resulted in a determination by the risk analyst[3] and topical area subject matter expert (SME).

- Terminology: safety-significance vs. risk-significance - This worksheet uses the term "safety significance" in lieu of "risk significance" in a manner consistent with NRR Office Instruction LIC-504, Revision 5, which states that, in addition to considering changes in risk, one must "ascertain that degradations to safety margins and defense in depth are minimal."

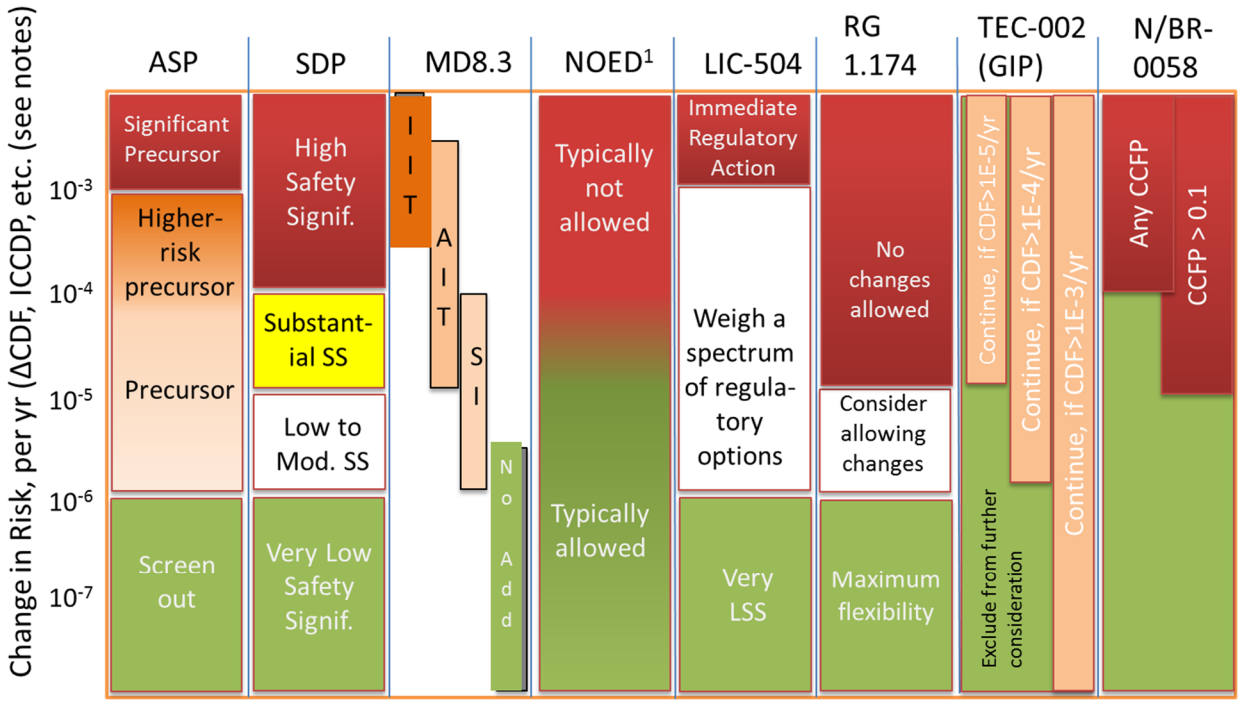
- Terminology: Use of the term "Very Low" – Different agency processes use terms like "low" to "very low" to mean similar things. Choice of wording is often driven by other contextual factors, rather than the denotation of the words. Here, the term "very low" is used to mean that an issue has insufficient safety significance to warrant further agency resource expenditure. This process is not to be used re-calibrate the thresholds associated with any other particular process. Figure 2 illustrates the differing terminology used in various NRC processes, in the context of risk-significance. This figure is based on CDF, but the same concepts apply to large early release frequency.

- Workflow - Regarding how to manage the work associated with this safety significance determination, Table 1 provides a suggested workflow. The risk analyst and topical area SME should approach the work in the way that is most efficient for their work style and availability. However, attention should be paid to how resources are being expended, since this process is a prioritization of resources and not a solution to the question or issue being posed. If a conclusion of very low safety significance cannot be determined within a total level-of-effort of (approximately) 10 to 20 hours, the issue is likely not

[2] This primarily refers to a LIC-504 evaluation following the guidelines in Appendix C or D of that document. A LIC-504 evaluation associated with an issue that is determined to be of very low safety significance may in fact be analogous to the treatment intended here.
[3] It is generally envisioned that the role of risk analyst will be filled by a qualified risk and reliability analyst from the Division of Risk Analysis. There may be instances where it is more efficient to have a Regional Senior Reactor Analyst fill this role.

clearly of very low safety significance, and a recommendation of "indeterminate" should be made to the integrated team.

- Flexibility in selecting an approach – For each section of the evaluation, the approach that is most suitable to the issue being evaluated should be selected. It is acknowledged that different approaches could lead to different outcomes, and this is judged to be an acceptable limitation, relative to the benefit of using existing approaches and promoting flexibility for the user. In anticipation that the process will be used most often in an inspection context (but with unresolved licensing basis aspects), Approach 1 from each element is the preferred approach (i.e., the approach that is most widely suited for this context). That said, the decision of which approach to use for each element is ultimately left up to the user. In rare cases, it may make sense to use a combination of approaches.



DISCLAIMER: There is some mixing of differing mathematical metrics in this representation (e.g., dCDF vs. dCDP vs. CCDP), and some processes that use different metrics for events versus conditions. This results in an apples-to-oranges comparison here, and for this reason, the graphic is only intended to be illustrative in nature.

[1] Assumes a 72 hour window and annualizes in the way done in SDP. This is not an apples-to-apples comparison.

Figure 2: Illustrative Comparison of Varying Process Terminology

- Uncertainty – The worksheet does not include a specific step associated with treatment of risk uncertainty (in contrast to DID or SM uncertainty), but it does include some aspects of how one accounts for uncertainty in risk-informed decisionmaking. More specifically, the risk evaluation can provide information about parameter and model uncertainty, via propagation of individual parameter uncertainties and conduct of sensitivity analyses. However, this is left here to the user's judgment as to whether that is a necessary step of this resource prioritization determination. Meanwhile, the elements of safety margin, defense-in-depth, and performance monitoring are primary

means (in general) of accounting for completeness uncertainty. These concepts are discussed in detail in NUREG-1855, Revision 1 (e.g., see Figure 2-1 and Section 2.3 of that document). The user is directed to document significant sources of uncertainty that are not otherwise considered in Section F.

- Peer review – Evaluations performed using this worksheet that lead to sunsetting an issue (partially) based on its safety significance would not generally fall under the auspices of ADM-405, "NRR Technical Work Product Quality and Consistency," in that an issue would not be clearly of very low safety significance if the evaluation was technically complex, involved new methodologies/technologies, represented a significant departure from past activities, or fit one of the other descriptors in Section 4.1 of that document. That said, and as ADM-405 states, if judgment plays a substantial role in the COM-106 response, or otherwise meets the characteristics described in Section 4.1 of ADM-405, the evaluation could be subject to that guidance. In this case, the risk analyst and topical area SME should identify the need for a peer review to the Integrated Team Chair and seek their approval to initiate a review using the guidance in ADM-405. They should also notify their branch chiefs of this recommendation.

Table 1: Suggested Workflow

Activity		**Participants[1]:**	**Total effort (hrs)**
Review intake material and other background		R, S	2 hours
Part One: Sync-up and analysis:			
0.5 hours	Call with issue owner or integrated team to assure understanding of the concern and its implications	I, R, S	1 hour
3 hours	Risk analyst and SME perform initial evaluation of risk, safety margin, and defense-in-depth	R, S	6 hours
0.5 hours	Discuss Section B-D results, as well as Section E	R, S	1 hour
Offline: Follow up on any open items		R, S	1 hour
Part Two: Refinement and finalization			
1 hour	Brief out preliminary results to broader integrated team	I, R, S	Separate
1.5 hours	Perform any additional work prompted by the above	R, S	3 hours
0.5 hours	Update writeup, complete Section F, and sign	R, S	1 hours
Total hours			**15 hrs**

[1] I = integrated team; R = risk analyst; S = topical area subject matter expert

Section A – Issue Description:

- Communication and coordination – For inspection issues, this step relies on good upstream interactions between the inspector and the regional SRA to arrive at an understanding of the degraded condition and how it impacts the plant response. This is not an activity that can be done solely by either party, as it requires judgment about how the condition will affect various functions in concert with an understanding of how those functions relate to a broad array of postulated accidents. Further, this step relies on a good handoff of that information to the individuals performing the safety significance determination here. The integrated team kickoff meeting is the prime opportunity for this, but the risk analyst should also consider reaching out to the regional SRA. All of the above is made more difficult in situations where the nature of the condition and its

impact on plant response is still evolving. For this reason, it is also important that any key assumptions made at this point in the process are documented.

- Additional Issue Complexities - This entry is intended to capture any synergistic effects that are known about the issue that would demonstrably cause its safety significance to otherwise be under-represented. It should not go beyond the typical tenets of the routine process that referred the issue to TAR (e.g., for an inspection issue it should not aggregate disparate concerns or factor in aspects beyond the licensee's ability to foresee and prevent). It is not intended to be open-ended, and any information captured should have a clear nexus to the issue's safety significance. An example of a legitimate synergy would be an issue relating to the plant's ability to mitigate an accident during a particular configuration, when combined with the knowledge that the plant routinely enters that configuration without factoring this issue in to the risk management assessment (e.g., concern about monitoring level at mid-loop for a plant that routinely does early mid-loop operations).

Section B – Associated Change in Risk

Approach B1 – Inspection Guidance *– Using IMC 0612 and the relevant attachments and appendices to IMC 0609, determine if the issue would meet the criteria for "minor." If it would not, determine if the proximate and posited degraded condition would (were the issue to have an associated performance deficiency) screen out of warranting additional evaluation (i.e., would be a finding of very low safety significance without the need to proceed to a Phase 2 assessment, a Detailed Risk Evaluation, or an Appendix M evaluation). In general, issues within these categories ("minor" or not requiring additional evaluation), would be expected to result in changes in risk to the public that would support a determination of being clearly of very low safety significance.* ***Avoid using the SDP color scheme.*** *If the issue would not screen out due to limitations in the coarse nature of that guidance, but is nevertheless of very low risk significance, consider using one of the other two approaches outlined below.*

Approach B2 – Risk Triplet Discussion – Relate the issue to its proximate impact on the plant, by characterizing (i) what can go wrong, (ii) how likely it is to occur, and (iii) what the consequences would be. More specifically, describe qualitative or semi-quantitatively how the issue would be expected to manifest in (i) an increase in initiating event frequency, (ii) a decrease in the capability of specified SSCs or operator actions to mitigate an accident, and (iii) the consequences associated with an accident. When applicable, characterize the fraction of time that, and the circumstances under which, the issue is relevant. Place the above impacts in the context of their relative plant-specific risk significance (e.g., using the Plant Risk Information E-Book), and make a judgment as to whether this risk is generally above or below the level at which the agency would typically respond (e.g., reactive inspection criteria in Management Directive 8.3) or approve a license amendment (e.g., within Region III of RG 1.174, Revision 3). Based on the totality of information, and using judgment, decide if the assessed change in risk would support a determination of being of very low safety significance.

Approach B3 – Scoping PRA Estimate – Identify the impacts of the issue on initiating event likelihood, impairment of SSC functionality, impairment of operator action reliability, and/or other aspects of how the issue affects risk to the public. Perform Standardized Plant Analysis Risk (SPAR) model calculations to identify the highest contributing core damage accident sequences and cut sets for the change in risk. Consider whether these high-contributing accident sequences would contribute to large early release frequency. Characterize the significance of the estimated increase in risk using the guidance in LIC-504, Revision 5, or

Regulatory Guide 1.174, Revision 3. For the purposes of this evaluation, this characterization represents the risk significance, not the overall safety significance. That said, for a resulting change in risk that is below the LIC-504, Revision 5, criterion of "very low safety significance" or within Region III of RG 1.174, Revision 3, the assessed change in risk would support a determination of being of very low safety significance.

Additional points of clarification and background on the above approaches:

- Exposure Time – Processing of findings often includes the concept of exposure time, i.e., that the degraded condition only persisted for a finite period of time. The term "Exposure time" is defined in IMC 0609, while the RASP Handbook includes instructions on how to estimate exposure time when it is not specifically known. Conceptually, the use of exposure time implies that the degraded condition has already been fixed. Here, it is quite possible that the condition will not be fixed (or at least that the agency will have no plans to confirm completion of the fix). In such cases, it may be necessary to assume an indefinite exposure time, and this alone may invalidate the utility of using some of the SDP screening questions. In such instances, the analyst may be better served by using Approach B3, because: (a) the IMC 0609 infrastructure is designed around a finite 1-year assessment cycle in SDP that also presumes the issue has been entered in to the corrective action program and (b) the Regulatory Guide 1.174 and LIC-504 processes are designed to compare to annualized risk measures.

- SDP Independence - Care should be taken to not imply that an SDP is being conducted, but rather that the tools associated with SDP are being utilized. This is most easily accomplished by not invoking the SDP color schemes. IMC 0308, Attachment 3 (issued June 2016) states, "The color of an SDP result carries with it an assurance that all of the specific applicable process provisions of the overall SDP have been met. Other forms of significance determination may not have the same process attributes, definitions, or assurances, and therefore should not be characterized using the SDP color scheme… Keeping the SDP color scheme independent from other forms of significance determination also aids in ensuring clear and consistent public representations that inspection findings with colors are inputs to the ROP assessment of licensee performance."

Section C – Safety Margins

Approach C1 – Risk Triplet *– Using engineering judgment, articulate why the erosion of safety margin (e.g., the degree to which the factor-of-safety has been reduced for an affected system) does or does not lead to an important change in (i) initiating events that can occur; (ii) SSC and operator response to postulated beyond design basis accident sequences; and (iii) the potential consequences from these accident sequences. Recognizing that the degree of margin above the design envelope is often not precisely known, articulate whether the degradation is likely in a regime more proximate to expected nominal performance versus expected failure, and describe the extent to which the potential degraded performance is or is not explicitly captured by the risk assessment. Further, assess to what extent the change in likelihood, mitigation, or consequence caused by the degraded margin translates to a change on the facility's overall impact on public health and safety. Based on the totality of information, and using judgment, decide if the assessed erosion of safety margin would support a determination of being of very low safety significance.*

Approach C2 – 50.69 Categorization – If the licensee has an approved 10 CFR 50.69 program, and it has categorized the relevant functions and systems under that program, identify whether the degraded plant response associated with the issue exclusively involves SSCs categorized as RISC-3 or RISC-4 (i.e., LSS in the 50.69 binning scheme). If this is the case, and given the way in which that program considers safety margin in categorization, the issue would be expected to result in a degree of safety margin erosion that would support a determination of being of very low safety significance.

Approach C3 – LIC-504, Revision 5, Appendix E, Section 2.3 provides a discussion of safety margin that can be used to frame this assessment. Based on the totality of information, and using judgment, decide if the assessed change in safety margin would support a determination of being of very low safety significance.

Additional points of clarification and background on the above approaches:

- Meaning and use of the term "safety margin" – The term "safety margin" is often used to describe two related, yet separate, concepts. Codes and standards routinely refer to terms-of-art like margin-of-safety and safety factor (and at times safety margin) to articulate (for instance) that degree of cushion that exists between a prescribed load and an estimated capacity. This is usually done in the context of a particular structure, system, or component (SSC) or a particular analysis, and reflects the traditional engineering practice of "over-designing" in light of uncertainty (i.e., engineering margin). The NRC continues to rely on this engineering practice as part of ensuring that plants are licensed safely. Meanwhile, as part of risk-informed regulation, the Commission and staff have routinely emphasized that risk information be used in conjunction with traditional engineering practices in ensuring "no undue risk." In the 1995 Commission Policy Statement on use of probabilistic risk assessment (PRA), the Commission used the terms "defense-in-depth" and "engineering margin" to describe these traditional practices. Meanwhile, in subsequent regulatory guidance (e.g., Regulatory Guide 1.174) and its common description of integrated (a.k.a., risk-informed) decision making, the staff has used the terms "defense-in-depth" and "safety margin." Thus, the intersection of the different terminology has become blurred. Clearly the use of engineering margin in the context of a particular SSC or analysis has a nexus to safety margin in terms of a plant-wide safety impact that might cause undue risk, when considered in an integrated fashion with PRA results and defense-in-depth. One can think of the former as a constituent contributor to the latter. Alternatively, one can think of individual instances of engineering margin as potential influencers on overall safety margin, depending on whether that particular SSC's margin erosion is important to public health and safety (not all SSC margin is influential to overall safety). In identifying what specific constituent margins are of relevance to the issue at hand, it may be helpful to refer to discussions of safety margin such as that contained in Inspection Procedure 71111.21M. However, this margin should not be open-ended, but rather should be tied to particular assumptions in the risk assessment or related to an impact on public health and safety that the risk assessment did not address. In other words, when assessing a specific issue's significance, one should develop an understanding of what margin (analytical, operational, maintenance-oriented, or otherwise) is being eroded, but ultimately the erosion of that individual margin must be viewed in terms of its impact on facility safety. Again, LIC-504, Revision 5, Appendix E, Section 2.3, provides additional discussion.

Section D – Defense-in-Depth

Approach D1 – Regulatory Guide 1.174, Revision 3, Section 2.1.1.3 *provides discussion on defense-in-depth, including 7 principles that can be used to frame the degree to which defense-in-depth is impacted. (Alternatively, LIC-504, Revision 5, and IMC 0609 Appendix M (issued January 2019) both contain similar discussion.) Describe how the issue impacts these 7 principles and describe the associated risk significance of this impact. This review would not be as detailed as the analogous exercise performed for license amendment requests and safety evaluation reports.*

Approach D2 – 50.69 Categorization – If the licensee has an approved 10 CFR 50.69 program, and has categorized the relevant functions and systems under that program, identify whether the degraded plant response associated with the issue exclusively involves SSCs categorized as RISC-3 or RISC-4 (i.e., LSS in the 50.69 binning scheme). If this is the case and given the way in which that program considers defense-in-depth in categorization, the issue would be expected to result in a degree of defense-in-depth preservation that would support a determination of being of very low safety significance.

Approach D3 – 50.69 Guidance - NEI-00-04, Revision 0, Section 6, provides a framework for assessing the degree of impact on defense-in-depth. Using this construct, identify the specific impacts on defense-in-depth. Use of this framework will lead to a conclusion that the issue (and more specifically its impact on how the plant will behave under accident conditions) falls into the category of either "potentially safety significant" or "low safety significance confirmed." The latter is synonymous with very low safety significance in the context of the TAR worksheet.

Section E – Performance Monitoring / Feedback

Approach E1 – Oversight *– Articulate why existing inspection scope or performance indicators could reasonably identify unanticipated and unrecognized faults in this assessment. For instance, if the issue would be expected to cause an increase in plant scrams, but this assessment concluded that the impact of this increase would not be safety-significant, would the Initiating Events Cornerstone Performance Indicators highlight errors in this judgment? Based on the totality of information, and using judgment, decide if there is sufficient opportunity for feedback.*

Approach E2 – Regulatory Reporting – Articulate why existing regulatory reporting requirements (e.g., Licensee Event Reports) could reasonably identify unanticipated and unrecognized faults in this assessment. This could include licensee Maintenance Rule activities, or licensee performance monitoring strategies implemented as part of previously approved license amendments, if the agency has sufficient visibility into these activities.

Approach E3 – If there are no applicable feedback mechanisms that would highlight a significant error in judgment, yet all other factors point to an issue of very low safety significance, work with the integrated review team chair to consider whether a more generic feedback mechanism is appropriate (e.g., if the issue might not be very low safety significance for other plants, propose an inspection smart sample).

Section F – Wrap-Up

- Integrated decisionmaking – Be aware that EPRI Report 3002014783 provides an industry perspective on how the various inputs to integrated decisionmaking can be best incorporated. Figure 4-1 and Section 4 of that report describe a process very similar to the one being invoked here, but which focuses on assessing Defense-in-Depth and Safety Margin ahead of the risk assessment rather than visa versa. Both approaches are reasonable, and they are both iterative processes in reality. The appendices of the EPRI report also provide Case Studies and presentation rubrics that may be helpful in brainstorming.

- Senior Level Advisor Consultation – While it is envisioned that the determination will be made primarily based on the technical expertise of the involved risk analyst and topical area SME, in consultation with the integrated team, consider reaching out to the relevant senior level advisors for advice on particular technical issues.

References:

ADM-405	Revision 3, "NRR Technical Work Product Quality and Consistency," Month, 23, 2020.
EPRI 3002014783	"A Framework for Using Risk Insights in Integrated Risk-Informed Decision-Making," February 2019
IMC 0308 Att. 3	"Significance Determination Process Technical Basis Document," June 16, 2016
IMC 0609	"Significance Determination Process," October 12, 2018 – *various attachments and appendices are referenced or implied*
IMC 0612	"Issue Screening," May 3, 2017 - v*arious appendices are referenced or implied*
IP 71111.21M	"Design Bases Assurance Inspection (Team)," December 8, 2016
LIC-504	Revision 5, "Integrated Risk-Informed Decision-Making Process for Emergent Issues," March 9, 2020.
MD 8.3	"NRC Incident Investigation Program," June 25, 2014
NEI-00-04	Revision 0, "10 CFR 50.69 SSC Categorization Guideline," July 2005
NUREG-1855	Revision 1, "Guidance on the Treatment of Uncertainties Associated with PRAs in Risk-Informed Decision Making," March 2017
RASP Handbook	Revision 2.02 Risk Assessment of Operational Events Handbook – Volume 1 – Internal Events, December 2017
RG 1.174	Revision 3, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," January 2018