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Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
Attn: Docketing and Service Branch

Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Detroit Edison Comments on the "Proposed Policy Statement on Use of Probabilistic Risk Assessment Methods in Nuclear Regulatory Activities," Federal Register Vol. 59, No. 235, December 8, 1994

The purpose of this letter is to provide Detroit Edison's comments on the subject proposed policy statement regarding the use of probabilistic risk assessment (PRA) in nuclear regulatory matters. In general, Detroit Edison supports the comments of the Nuclear Energy Institute (NEI) made in behalf of the nuclear industry on this document. Specific comments by Detroit Edison follow.

First, Detroit Edison is pleased that a policy statement on PRA use in nuclear regulatory matters is being formulated by NRC. Such a policy statement is necessary for a continuing meaningful and consistent utilization of PRA in the regulatory arena to achieve a regulatory emphasis that is more commensurate with risk. Thus, the policy characterization of the use of PRA technology as complementing the deterministic licensing approach is appropriate so long as it is recognized that some deterministic based decisions will be subject to modification based on the application of best estimate risk considerations. It is assumed that this accommodation for change is what is meant by "the NRC staff, licensee, and Commission must be prepared to consider changes to regulations, to guidance documents, to the licensing process, and to the inspection program" as stated under "Policy Implications" in the proposed policy statement.

Detroit Edison also agrees that application of PRA technology to regulatory matters should not extend beyond applications

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supported by the state-of-the-art in PRA methods and data. However, that limitation criterion is not precise. The existence of some uncertainty in either data or methods should not automatically be equated to exceeding the "state-of-the-art" and thus a priori preclude a particular application of PRA. Technical judgment in this matter is essential.

The discussion of uncertainties in Part II.(B) of the proposed policy statement is appropriate. However, in the implementation of this part of the policy, care must be exercised to restrain from requiring or implying the need for massive plant specific component level failure rate data collection programs. Collecting such data in an accurate and consistent manner for PRA application is not an easy task, and the resulting benefit may well be marginal. Initiating event frequency and system unavailability data are more likely to drive the PRA results. Absence of a formal all inclusive component data gathering program does not preclude the identification and treatment of true component outliers ("bad actors").

Two additional concerns deserve comment. First, while recognition has been given in the proposed policy statement to the desirability of consistency in PRA use, this should not be construed to mean that all PRA models should be made uniform. Adherence to basic minimum standards as proposed by NEI's PSA Applications Guide (under development) may be a reasonable approach, but strict conformance to detailed standards would be unworkable. Allowance of model flexibility should be recognized in the policy statement. In fact, at this period of time for currently operating plants, the option for a utility to completely forego the use of PRA should be maintained. Secondly, there is a concern caused in part by the statements of some NRC personnel that application of this policy could result in requirements for a shutdown PRA and for highly prescriptive methods for maintaining a "living PRA." A shutdown PRA model and "risk meters" could be useful, but they can also be very expensive. The former is not required to assure an appropriate level of safety during shutdown operations, and the latter is certainly not required for useful and valid PRA application. Much can be done with current PRA technology in time frames much greater than the "on-line" implication of a risk meter. It is appropriate that the PRA model be a reasonable representation of the plant, but the very nature of a PRA model generally does not require the precision of update that is applied, for example, to a control room simulator used in operator training.

In summary, Detroit Edison feels that PRA methods should indeed be used to provide a risk based component to regulatory matters, and a policy statement should help achieve this end. However, care needs to be exercised so that the end product is

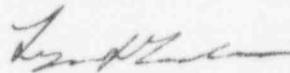
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not simply an additional layer of PRA related licensing requirements superimposed on inflexible deterministic requirements. Moreover, definite steps toward a more risk based licensing approach need to be taken in the near term and not wait until all PRA shortcomings are resolved. Much can be gained with current PRA technology and using generic data. Inordinate delay in achieving meaningful regulatory application will make it difficult for industry to maintain their current momentum in expanding the quality and utilization of PRA technology.

Suggested editorial changes in the policy statement as it now stands are given in Attachment A.

If you have any questions, please contact Mr. Earl Page at (313) 586-4266.

Sincerely,



Lynne S. Goodman
Director, Nuclear Licensing

Attachment

cc: T. G. Colburn
J. B. Martin
M. P. Phillips
A. Vogel

Attachment A

Editorial Changes Suggested for Section II of Proposed PRA
Policy Statement.

Section II(A), third paragraph, sentences 2-4:

Comment - The important PRA characteristic of realism versus arbitrary failure assumptions is missed in the comparison as stated. Suggest new wording as follows for sentences 2 through 4.

New Wording (Replace sentences 2-4) - "Mitigating system reliability is then realistically assessed without regard to safety classification. Single failure is not mandated as in the deterministic approach, but multiple failures are allowed including the effects of common cause. The probabilistic approach to regulation is therefore considered an extension and enhancement of traditional regulation by considering risk in a more realistic, coherent, and complete manner."

Section II.(A), third paragraph, last sentence:

Comma is needed after "public health and safety."

Section II.(B), first paragraph, second sentence:

Replace "are derived" with "result."

Section II.(B), first paragraph, third sentence:

Comma is needed after "deterministic regulations."