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U.S. Nuclear Regulatory Commission
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Comments on the Proposed Policy Statement on the Use of Probabilistic Risk Assessment Methods in Nuclear Regulatory Activities (59FR63389)

Pilgrim Station supports the concept for the issuance of an overall policy on PRA use in nuclear regulatory activities. The subject proposed policy statement appears to fulfill the Commission's intention to encourage NRC Staff use of PRA applications and through implementation, improve the staff's risk effective safety decision making, provide a means for more efficient use of agency resources, and reduce unnecessary burdens on licensees. We recommend the continued NRC staff open dialogue and industry involvement already successfully undertaken for the PRA Implementation Plan.

We endorse the recommendations for further clarification and expansion of the Policy Statement in specific areas as outlined in the Nuclear Energy Institute (NEI) comment letter dated February 7, 1995. In addition, the following comments are offered to underscore NEI's comments concerning NRC implementation of the policy statement.

We recommend the Commission focus particular attention and oversight of the NRC staff during the outset of the Policy implementation period to avoid the potential for inadvertently creating increases in the costs associated with regulatory interactions. Until properly trained to understand PRA use and limitations, a perceived need by the staff to have licensees address PRA implications in all or most regulatory issues could easily lead to additional information requests and create an additional regulatory burden; instead of the burden reduction being sought by the Policy Statement. Although well intentioned, such verdant activity may be unnecessary for proper Policy Statement implementation. However, it can be controlled by managing for uniformity across the agency in PRA applicability decisions and managing for consistency in policy interpretation through the entire NRC chain of command, especially at the inspector and technical reviewer levels. For example, the following areas within the Policy Statement goals could take on varied perspectives if not closely monitored.

In Section (1) and (3), the Policy refers to "supporting data" for use in regulatory decisions and matters involving PRA use. The NRC's use of generic data sometimes reflects the use of overly conservative information. Plant specific PRA applications should reflect the use of plant specific data in lieu of generic data when available. It would be helpful if the NRC opened their databases for public scrutiny for review and possible revision. Our experiences with the NRC and their contractor involved in the Accident Sequence Precursor (ASP) Program revealed data bases that were not truly reflective of our plant design. Since the Policy discusses the need for PRA evaluations to be as realistic as possible and that appropriate supporting data be publicly available for review, it appears logical that this goal be equally applied to the NRC data.

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Section (2) of the Policy discusses reducing unnecessary conservatism associated with current regulatory requirements and Section (4) discusses use of appropriate consideration of uncertainties in making regulatory judgments in the context of backfitting new generic requirements on licensees. Both areas involve use of NRC "judgment" and personify our concern for maintaining an awareness across the agency for consistency in decision making. We maintain that the real strength of a PRA application is the insights gained from various scenarios. It should therefore not become an NRC focus to dwell on absolute values and spend time and effort attempting to remove all PRA uncertainties before using the tool.

We appreciate this opportunity to comment on the proposed policy statement. The areas of concern we discussed should be addressed during the NRC staff training and development program mentioned in the Policy Implications portion of the Federal Register Notice. Therefore, as a final comment, we recommend that these training sessions be developed in unison with industry assistance and participation in the training. Since we seek the same outcome as the Commission for the expanded use of PRA, and have already developed the expertise through our IPE and IPEEE efforts, we feel we can assist the NRC in their staff development efforts. This can be arranged through the continued NRC interactions with the industry in the PRA Implementation Plan effort.

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