

August 28, 2020

Mr. Greg Bowman
Deputy Director, Division of Risk Assessment
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI Feedback on Risk-Informed Process for Evaluations

Project Number: 689

Dear Mr. Bowman,

On behalf of our members, the Nuclear Energy Institute (NEI)¹ offers the attached feedback regarding the Nuclear Regulatory Commission's (NRC) development of the Risk-Informed Process for Evaluations, or RIPE. This feedback is consistent with the dialogue at the recent public meeting on August 13, 2020. The industry appreciates the NRC staff's attention to this initiative. We are encouraged by the NRC's efforts to address very low safety significant compliance issues in a manner consistent with the Principles of Good Regulation. Using risk-informed approaches when evaluating changes, modifications and actions needed is appropriate and NRC's efforts to be more risk-informed are welcome. Consideration of risk is built into the daily operation of our nuclear plants and a streamlined approach that leverages our advanced understanding of plant risk is appropriate.

During the public meeting, there appeared to be alignment on the approach for constituting an integrated decision-making panel as part of the RIPE review. Allowing for a 10 CFR 50.69-equivalent IDP is appropriate, and the framework under TSTF-425 is an appropriate starting point. The industry has developed draft IDP guidance for RIPE (Attachment 1) that is based on the TSTF-425 IDP framework, which should be considered as a 10 CFR 50.69-equivalent IDP. As we discussed at the public meeting, we support a graded approach for NRC use of the streamlined review process based on the PRA being utilized by the IDP. More specifically, use of the streamlined process should be available to licensees using a PRA used to support an NRC-approved TSTF-505 or TSTF-425 application. We consider this to be an important aspect of the RIPE process that will meet the NRC's RIPE objectives and is consistent with the riskSMART initiative.

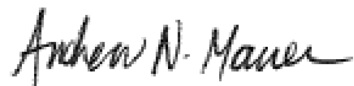
¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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We have also reviewed the NRC draft guidance document on RIPE, and Attachment 2 provides specific comments for your consideration. We trust these comments will be helpful in ensuring that the final version of the NRC RIPE guidance provides the clarity needed for effective use and does not provide a disincentive based on overall plant risk.

If you have questions concerning this letter or the attached comments, please contact me or Victoria Anderson (202.739.8101 or vka@nei.org).

Sincerely,

A handwritten signature in black ink that reads "Andrew N. Mauer". The signature is written in a cursive, flowing style.

Attachments

c: Ms. Caroline Carusone, NRR, DORL