

Proposed Expansion to the Risk Informed Process for Evaluations

Public Meeting
February 25, 2021



Introduction

- RIPE establishes a more efficient means to review licensing actions that address low safety significance issues that are within the licensing basis.
- Adoption of RIPE was recommended to the NRR Office Director by memo dated January 5, 2021 (ML20261H428).
 - Enclosure 1 - Guidelines for Characterizing the Safety Impact of Issues (ML20261H462)
 - Enclosure 2 - Temporary Staff Guidance TSG-DORL-2021-01 (ML20261H463)
- The NRR Office Director approved RIPE by memo dated January 7, 2021 (ML21006A324).

Disclaimer

- As approved, licensees must have an approved TSTF-505 (Risk-Informed Completion Times) license amendment to use RIPE.
- The RIPE working group reviewed the process proposed by the Nuclear Energy Institute (NEI) for expanding RIPE to include licensees with an approved TSTF-425 (Surveillance Frequency Control Program) license amendment, as presented at the January 26, 2021 public meeting (ML21015A003).
- The views presented in this presentation are the views of the RIPE working group and do not represent an official NRC position.

High Level Feedback

- The conceptual process for expanding RIPE to include licensees that have a TSTF-425 amendment looks reasonable.
 - TSTF-425 amendments did not review external hazards with the same level of detail as TSTF-505 amendments due to the different scope of the two programs.
 - NEI's proposed process addresses the need to review the applicability of external hazards and any open F&Os.
- There was no mention of using the F&O closure process to close open F&Os prior to using RIPE. This would be preferred to having the NRC review open F&Os.

Case 1 - Classic RIPE

It seems appropriate that licensees with an approved TSTF-425 amendment can use RIPE as-is, if:

- the licensee's internal events PRA does not have any open F&Os
AND
- the exemption/amendment does not have any impact on external events.

NRC would like to see additional guidance on how the review would be done to justify the issue only impacts internal events.

- This justification would need to be part of the application.
- We expect that very few issues will be able to justify that the exemption/amendment does not impact any external event risk.

Case 2 – Open F&Os

It seems appropriate that licensees with an approved TSTF-425 amendment and a FEW open F&Os could use RIPE.

- Reviewing open F&Os will take more NRC review than is currently part of the RIPE TSG, including the potential need for requests for additional information (RAIs).
- The number, complexity, and applicability of open F&Os could significantly increase the NRC review time.
- If the open F&Os have been reviewed in a recent application, NRC review could be streamlined.

Case 3 – Applicable External Events

It seems appropriate that licensees with external event PRA models that have been previously reviewed for other purposes, such as for NFPA-805 or Post-Fukushima 50.54(f) seismic/flooding evaluations, may qualify for RIPE.

- The external event PRA that will be used must be peer reviewed and *all applicable* F&Os must be closed in order to use RIPE.
- Any open F&Os that need to be reviewed by the NRC will require additional review time.
- If external events are applicable and the external events PRA has not been previously reviewed by the NRC, the licensee does not qualify for RIPE.

Other Concerns

- When was the PRA last updated?
 - The application needs to discuss when the PRA was last reviewed by the NRC and any updates and peer reviews that occurred since the last review.

Path Forward

- The TSG and “Guidelines for Characterizing the Safety Impact of Issues” guidance will require revision to use TSTF-425.
 - The approved TSG does not include the option to ask RAIs or use TSTF-425 for RIPE submittals.
 - The “Guidelines for Characterizing the Safety Impact of Issues” guidance allows case by case use of TSTF-425 in lieu of TSTF-505.
- Further guidance enhancements can be completed as more experience is gained with the use of RIPE.
- Expansion to other areas will require significant additional guidance development and engagement with cognizant technical staff.

Questions?



Send additional feedback or questions to:
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