

From: MAUER, Andrew <anm@nei.org>
Sent: Thursday, April 29, 2021 4:31 PM
To: Zoulis, Antonios
Cc: Carusone, Caroline; Reed, Tim
Subject: [External_Sender] Issuance of NEI 21-01: Industry Guidance to Support Implementation of NRC's Risk-Informed Process for Evaluations
Attachments: 04-29-21_NRC_NEI 21-01.pdf

April 29, 2021

Mr. Antonios Zoulis
Chief, PRA Oversight Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Issuance of NEI 21-01: Industry Guidance to Support Implementation of NRC's Risk-Informed Process for Evaluations

Project Number: 689

Dear Mr. Zoulis:

The NRC issued the Risk-Informed Process for Evaluations (RIPE) in January 2021. The industry views RIPE as a key example of the U.S. Nuclear Regulatory Commission's efforts to become a more modern risk-informed regulator. Using risk-informed approaches are appropriate when evaluating changes, modifications and actions needed and NRC efforts to be more risk-informed are welcome. Consideration of risk is built into the daily operations of our nuclear plants and a streamlined approach that leverages our ever-increasing understanding of risk in all aspects of plant operation is appropriate.

RIPE provides licensees with a risk-informed method to disposition issues of very low safety significance. Licensees can use the RIPE process to evaluate the safety significance of an issue, and if it is determined to be of low safety significance, can submit a license amendment or exemption request to the NRC and qualify for a streamlined NRC review. We appreciate the public interactions that we have had with the NRC staff over the first four months of 2021 to expand the use of RIPE to maximize its use among the operating reactor fleet. The Nuclear Energy Institute (NEI), on behalf of its members, has issued [NEI 21-01, "Industry Guidance to Support Implementation of NRC's Risk-Informed Process for Evaluations."](#) A [copy](#) of the document is also available for NRC use. This guidance incorporates feedback received from the NRC staff and allows RIPE to be used by plants with TSTF-425, "Relocate Surveillance Frequencies to Licensee

Control-RITSTF [Risk-Informed TSTF] Initiative 5b,” or TSTF-505, “Provide Risk Informed Extended Completion Times – RITSTF Initiative 4b.”

We are continuing to work with our members to explore opportunities to use this new process.

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

Sincerely,

Andrew N. Mauer
Senior Director, Regulatory Affairs
Generation & Suppliers

Nuclear Energy Institute
1201 F St NW, Suite 1100
Washington, DC 20004
www.nei.org

P: 202.739.8018

M: 202.344.7137

E: anm@nei.org

This electronic message transmission contains information from the Nuclear Energy Institute, Inc. The information is intended solely for the use of the addressee and its use by any other person is not authorized. If you are not the intended recipient, you have received this communication in error, and any review, use, disclosure, copying or distribution of the contents of this communication is strictly prohibited. If you have received this electronic transmission in error, please notify the sender immediately by telephone or by electronic mail and permanently delete the original message. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

Sent through www.intermedia.com

Hearing Identifier: NRR_DRMA
Email Number: 1161

Mail Envelope Properties (e67bbe262e594f70919a932e275f6d01)

Subject: [External_Sender] Issuance of NEI 21-01: Industry Guidance to Support Implementation of NRC's Risk-Informed Process for Evaluations
Sent Date: 4/29/2021 4:30:47 PM
Received Date: 4/29/2021 4:31:02 PM
From: MAUER, Andrew

Created By: anm@nei.org

Recipients:

"Carusone, Caroline" <caroline.carusone@nrc.gov>
Tracking Status: None
"Reed, Tim" <Timothy.Reed@nrc.gov>
Tracking Status: None
"Zoulis, Antonios" <Antonios.Zoulis@nrc.gov>
Tracking Status: None

Post Office: nei.org

Files	Size	Date & Time
MESSAGE	3893	4/29/2021 4:31:02 PM
04-29-21_NRC_NEI 21-01.pdf	539014	

Options

Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:

ANDREW N. MAUER

Senior Director
Regulatory Affairs

1201 F Street, NW, Suite 1100
Washington, DC 20004
P: 202.739.8018
anm@nei.org
nei.org



April 29, 2021

Mr. Antonios Zoulis
Chief, PRA Oversight Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Issuance of NEI 21-01: Industry Guidance to Support Implementation of NRC's Risk-Informed Process for Evaluations

Project Number: 689

Dear Mr. Zoulis:

The NRC issued the Risk-Informed Process for Evaluations (RIPE) in January 2021. The industry views RIPE as a key example of the U.S. Nuclear Regulatory Commission's efforts to become a more modern risk-informed regulator. Using risk-informed approaches are appropriate when evaluating changes, modifications and actions needed and NRC efforts to be more risk-informed are welcome. Consideration of risk is built into the daily operations of our nuclear plants and a streamlined approach that leverages our ever-increasing understanding of risk in all aspects of plant operation is appropriate.

RIPE provides licensees with a risk-informed method to disposition issues of very low safety significance. Licensees can use the RIPE process to evaluate the safety significance of an issue, and if it is determined to be of low safety significance, can submit a license amendment or exemption request to the NRC and qualify for a streamlined NRC review. We appreciate the public interactions that we have had with the NRC staff over the first four months of 2021 to expand the use of RIPE to maximize its use among the operating reactor fleet. The Nuclear Energy Institute (NEI)¹, on behalf of its members, has issued [NEI 21-01, "Industry Guidance to Support Implementation of NRC's Risk-Informed Process for Evaluations."](#) A [copy](#) of the document is also available for NRC use. This guidance incorporates feedback received from the NRC staff and allows RIPE to be used by plants with TSTF-425, "Relocate Surveillance Frequencies to

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to 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 and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

Mr. Antonio Zoulis

April 29, 2021

Page 2

Licensee Control-RITSTF [Risk-Informed TSTF] Initiative 5b," or TSTF-505, "Provide Risk Informed Extended Completion Times – RITSTF Initiative 4b."

We are continuing to work with our members to explore opportunities to use this new process.

If you have questions concerning this letter, 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 style with a prominent initial "A".

Andrew N. Mauer

CC: Caroline Carusone, Deputy Director, Division of Operating Reactor Licensing, NRR, NRC
Tim Reed, NRR, NRC