

From: [Cyril Draffin](#)
To: [Segala, John](#); [Hoellman, Jordan](#)
Subject: [External_Sender] Question regarding NRC Graded PRA approach (follow up to recent Stakeholders meeting)
Date: Tuesday, June 01, 2021 3:34:51 PM

John and Jordan,

Could you please send these comments and three questions to Marty Stutzke and Nathan Sanfilippo.

Perhaps one of them could send me an email explaining current thinking.

I could wait until the next public meeting to ask, but see no advantage in waiting.

Thanks.

A factor that did not get discussed at 27 May 2021 Advanced Reactors Stakeholders meeting was when the PRA had to meet the consensus standard.

- Q1: Would the graded approach NRC is considering permit a PRA that does not meet the elements of the consensus standard for licensing?

A difference between Part 50/52 and proposed Part 53 seems to be when the standard must be satisfied. For part 52 COL holders, my understanding is the acceptability of the PRA when compared to the consensus standard occurs one year before fuel load. If a design certification is never constructed (e.g. the ESBWR), then Part 52 structure would not require the PRA to be of such quality that the consensus standard is met. It is only after construction is complete that the PRA provisions for acceptability apply.

- Q2: Is this correct?

The reason timing is important is that under the construct presented in proposed Part 53, the PRA standard must be met at the time of an application for a CP/OL/COL. That is a substantial difference in the application of the PRA and its purpose (leading versus supporting). The timing element should not be underestimated for its effect, unless the graded approach would permit the staff to conclude that the requirements for having a PRA are met without meeting all the requirements of the consensus standard. This seems very tricky and could lead to substantial numbers of RAIs and litigation.

- Q3: Could NRC staff please clarify?

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