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May 23, 2022

Mr. Meraj Rahimi
Chief, Regulatory Guide and Programs Management
Division of Engineering
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments on Trial Use Regulatory Guide 1.247, "Acceptability of Probabilistic Risk Assessment Results for Advanced Non-Light Water Reactor Risk-Informed Activities"

Project Number: 689

Dear Mr. Meraj Rahimi:

The Nuclear Energy Institute (NEI)¹, on behalf of its members, submits the following comments on Trial Use Regulatory Guide 1.247, "Acceptability of Probabilistic Risk Assessment Results for Advanced Non-Light Water Reactor Risk-Informed Activities." We appreciate the opportunity to comment on this regulatory guide during the trial use period, and additionally appreciate that the majority of the comments from our December 9, 2021 letter were addressed by the NRC staff in this version of the trial use regulatory guide.

In our review of this version of trial use Regulatory Guide 1.247, we noted that three specific comments provided in our December 9, 2021 letter were not adequately addressed.

- The second comment from this letter, addressing the added expectations for feasibility studies in Human Reliability supporting requirements, was not resolved in this draft. This issue will be resolved with the LWR Level 1 PRA standard in the coming months, and NEI supports retaining consistency with this standard in Regulatory Guide 1.247 once resolution is reached.
- The third comment from this letter, addressing the added expectation for The consideration of acts of commission and the inconsistency with the current state of the practice, was not fully resolved in this

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.

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draft. The latest draft does include additional language on the scope of such considerations; however, this added language does not maintain consistency with the LWR PRA standard. NEI supports retaining consistency with the LWR PRA standard in Regulatory Guide 1.247, which would call for removal of this added expectation.

- The ninth comment from this letter, addressing NRC's non-endorsement of supporting requirements addressing reporting thresholds, was not resolved in this draft. Given the importance of these supporting requirements in the licensing process, NEI finds that endorsement of these supporting requirements is needed and urges NRC to update Regulatory Guide 1.247 to include such endorsement.

We encourage NRC to consider and address all stakeholder comments during the trial use period for this regulatory guide. Please contact me at vka@nei.org or (202) 739-8101 with any questions about the content of this letter or the attached comments.

Sincerely,



Victoria K. Anderson

c: Mr. Anders Gilbertson, RES
Ms. Michelle Gonzalez, RES
Ms. Harriet Karagiannis, RES
NRC Document Control Desk