

RIC 2003

Risk-Informed Activities, Session T3

Regulatory Coherence

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April 17, 2003



Overview

- What is coherence?
- Examples of incoherence
- Benefits of coherence
- Barriers to coherence
- Outlook/Conclusions

What is Coherence?

- Webster
 - Logically ordered or integrated
 - United in principles
 - Systematic connection or consistency
- Given what we know and when we know it, does the regulatory framework make sense?

Examples of Incoherence

- Risk assessment and management per 10 CFR 50.65(a)(4) vs. plant technical specifications
- Risk-informed reactor oversight process vs. deterministic requirements in Part 50
 - 837 “green” inspection findings in 2002 (96% of all colored inspection findings)

Benefits of Coherence

- Improve the focus on safety
- Improve effectiveness and efficiency of the regulatory process
- Allow better understanding of the regulatory framework for all stakeholders

Barriers to Coherence

- Resistance to change
- Perceptions of PSA technical adequacy
 - Level of precision necessary
 - Need(?) for full scope quantitative models
- Timeliness of the regulatory process

Outlook/Conclusions

- Recent Commission decisions will reinvigorate activity in risk-informed initiatives
- PSA is a tool, a means to an end, and is not an end in itself
- Coherence is a goal that we will always be working toward