

Commission SRM on PRA Scope and Quality - Industry Perspectives

Risk Informed Activities Session T3

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March 11, 2004



Commission Paper & SRM

- Addresses issues of PRA completeness raised by ACRS, Staff, Commission
- Provides phased approach to achieving greater consistency, efficiency, and confidence in using PRAs to support regulatory decisionmaking
- Does not inhibit continued progress with applications using existing models



Perspectives on SRM

- SRM is useful and timely
- Helps clarify lingering questions on PRA scope expectations
- Pragmatic approach to improved PRA scope and quality
- NRC staff initial efforts on plan have been thoughtful, constructive



Phases

- Phase 1: current practice
- Phase 2: issue specific - risk contributors “significant to the regulatory decision” should be quantified
- Phase 3: all applications - risk contributors “significant to the regulatory decision” should be quantified
- Phase 4: fully quantified state of the art PRAs for all initiators and modes

Industry Philosophy

- PRA scope and quality are separate issues
 - Both need to be defined in context of application
- PRA quality exists today
 - Peer reviews, standards development
- Further improvements in PRA scope can support wider ranges of applications
 - Greater scope equals greater benefit



Considerations for scope

- Not all risk contributors are significant for all plants, or all regulatory decisions
- Benefit, value, and priority of scope expansion are key considerations
- Infrastructure to produce/improve PRAs, perform peer reviews, for 103 plants, is a bounding consideration
- Qualitative or bounding methods can be effective and appropriate for certain risk contributors, and are not inherently inferior to quantitative methods for many regulatory decisions

Key Questions

- PRA standards development is key consideration of paper, SRM
 - Should PRA standards define existing good practice, or specify new methods?
 - Should PRA standards address qualitative or semi-quantitative approaches?
 - Should practicality of application, value, and benefit (to the decision) be a consideration of the standards efforts?

Conclusions

- Industry and NRC staff can work constructively to implement SRM
- Continued success in applications is key to PRA scope improvement
- Proper framework for progress will benefit NRC and stakeholders needs