



Piloting Regulatory Guide 1.200

Eugene Kelly

Limerick Engineering Programs Manager

RIC 2005 – Session Wed G4: Risk-Informed

Overview

- ASME Standard and Regulatory Guide were used to identify gaps
- Process is “transportable”
- Application success provides incentive
- Success drives model improvement

December 2003 Gap Analysis

- 84 actions to meet Category II
- Half are documentation-related
- 28 high priority actions
- Gaps addressed strategically

July 2004 NRC Audit

- Not peer review
- Focus on base Model
- Substantial changes to Category II
- Peer review recommended
- Significant agreement (LGS and NRC)

Significant Agreement

- 267 ASME supporting requirements
- 192 grades agreed with Exelon
- Approximately 80% are “pass/fail”
- 73 requirements not met
- 16 of 68 graded Category II

Areas for Improvement

- Documentation for pre-initiator HEP's
- Pedigree and consistency of HRA
- Enhanced references for data and bases for success criteria
- Increased use of plant-specific data
- Comprehensive system notebooks

Feedback on RG 1.200

- Open-ended meaning of key assumptions and areas of uncertainty
- “Significant differences” term unclear
- Table B-4 does not address MU
- Absolute versus application-specific

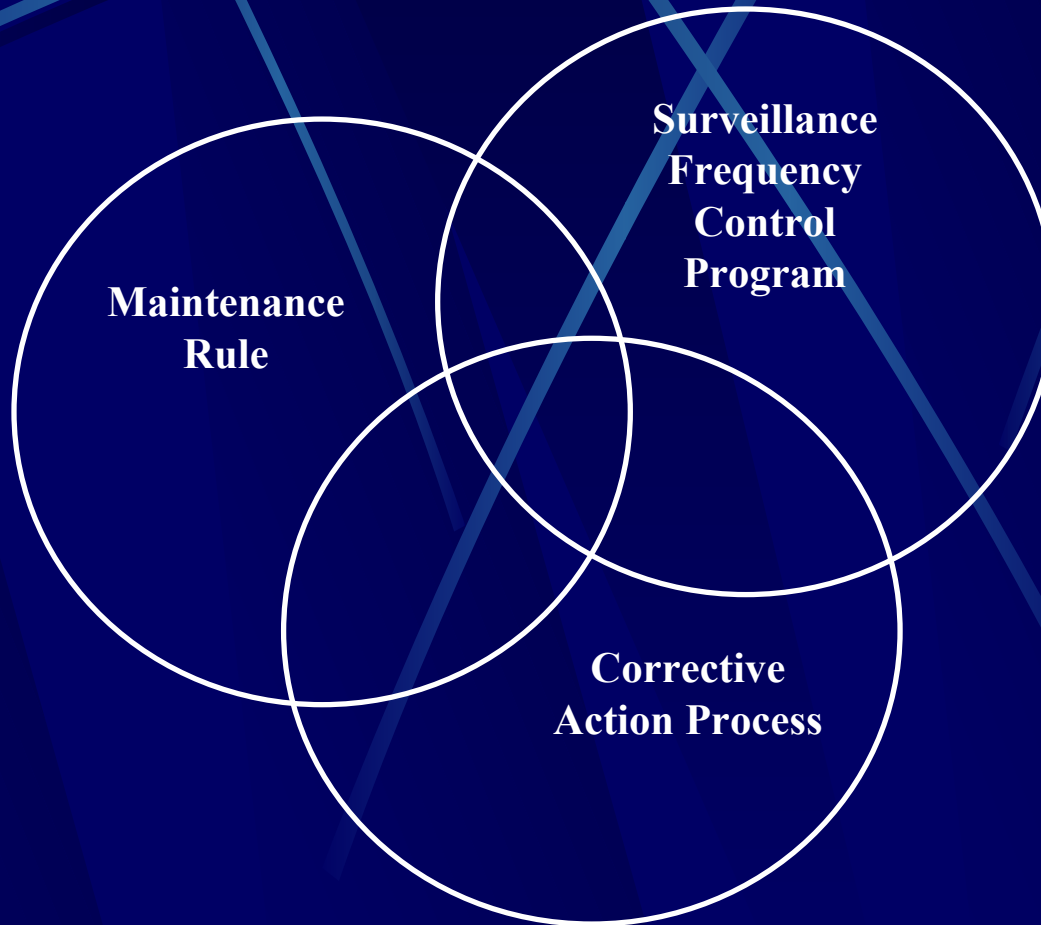
Maintenance and Upgrade

- Precedent of update versus upgrade
- Exelon updates every 3 years
- Methodology for HRA and data
- Re-arrangement of event trees
- Expanded treatment of common cause

5b Application

- LAR submitted in June 2004
- TSTF-425 and NEI 04-010 Guideline
- BWROG and NEI sponsorship
- Potential RAI's on justifying low priority gaps and diversity of HRA methods

Inter-relationships



Administrative Controls

- Process mapping underway
- Analogous to Maintenance Rule
- Incorporate feedback from NSRB, Owner's Group, PORC comments
- Continue conduct of pilot panels (IDP)

Cost and Impact

- RG 1.200 Gap Analyses
- PRA Model upgrade
- 5b Application
- Reliability data
- Peer review in 2005

Challenges

- Fire PRA and 2006 Standard
- Seismic and Appendix C
- Closing all the gaps
- Achieving full Category II capability
- Future changes and higher standards