10 CFR 50.69 Update and Lessons Learned

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10 CFR 50.69 Pilots

- Westinghouse Owners Group (WOG) is pursuing two pilot applications of 50.69
  - The goal of the pilot applications is to provide trial usage of the categorization guidance and to demonstrate the regulatory review process is reasonable
- WOG pilots are:
  - Wolf Creek: Containment Spray and Control Building Ventilation Systems
  - Surry: Chemical and Volume Control System
- Current submittal schedule:
  - Wolf Creek: Late 1st Q ’06 Surry : 3rd Q ‘06

50.69 Pilot Categorization Insights

- Used NEI 00-04 and ASME Code Case N-660 for active and passive components, respectively
- The guidance, as modified by pilot feedback, was workable
  - NEI 00-04, as modified, was endorsed in RG 1.201
  - N-660 revision, used in the pilots, has not been approved by ASME due to issues raised by NRC
- The plant PRAs generally cover the qualitative criteria
- Guidance works very well for components not modeled in the PRA

50.69 Benefits

- 50.69 was designed to increase safety by focusing attention on risk significant components, even if they were not safety related.
- The open language of Regulatory Guide 1.201 increases uncertainties related to long term costs of monitoring the performance low risk significant (RISC-3) components and investigating their failures.
- The WOG Cost Benefit for 50.69, which was the basis for the regulatory analysis, has been validated by the pilot categorization efforts and some feasibility studies at PWRs
  - Regulatory Guide 1.201 could significantly impact the cost benefit

50.69 Cost Benefit Insights

- Most of the projected savings are in the procurement area
  - For some RISC-3 SSCs, relaxed treatment may not be implemented where savings may not be sufficient to warrant separate inventory controls
- The projected savings are based on performing both active and passive categorization
  - Many components have both active and passive functions
- The projected costs could be impacted by RG 1.201
  - Additional monitoring / investigation for low safety significant components is more than currently required for safety related components

Barriers to Implementation

- Regulatory uncertainty for RISC-3 treatment
  - Uncertainties in monitoring and failure analysis requirements
  - Uncertainties in NRC inspections
- PRA technical adequacy
  - Internal events PRA
  - Qualitative or quantitative external events PRA methods
  - Escalating requirements for external events and shutdown
- Culture change at utilities