



U.S.NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

RIC 2007
10CFR50.46

T. S. Kress

ACRS

March 14



ON THE DRAFT RULE TO RISK-INFORM 10CFR50.46

T. S. Kress
Member ACRS

Presented at
2007 RIC

Design Space vs. Risk Space

Quotes from ACRS:

“There is not a direct unique one-to-one correspondence between how well a plants design “meets” the various DBA FOMs and the actual status of the design with respect to design risk acceptance criteria”

“The regulatory objective should be to render a plant design to an acceptable level of risk”

General ACRS Concerns [Letter of Nov. 16, 2006 with added comments]

Main Letter

- Defense-in-depth needs strengthening
- Cap on CDF is a significant departure from R.G. 1.174

Added Comments

- Consequences not adequately explored
- Rule not necessary
- NUREG-1829 needs a peer review

WHY I DO NOT LIKE THIS RULE

1. There can be no real credible a priori estimate of the risk impact
2. Not appropriate to risk inform DBAs this way
3. Cap on CDF is different approach and supercedes R.G. 1.174
4. Risk impact & tracking left up to licensee without review and approval
5. Margins are compromised and not evaluated
6. The delta CDF cap does not seem appropriate for new plants
7. Rule not necessary



CONCLUSION

I recommend this rule not be approved.