


## GSI-191 Lessons (to be) Learned

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NEI




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## GSI-191 Timeline (Incomplete)

- 9/2001 Completed technical assessment of PWR sump blockage
- 9/2002 NEI 02-01 Containment Walkdown Guidance Issued
- 6/2003 Bulletin 2003-01 Issued
- 11/2003 Regulatory Guide 1.82 Rev. 3 Issued
- 9/2004 Generic Letter 2004-02 Issued
- 12/2004 NEI 04-02 and NRC SE Issued
- 3/2005 Licensee responses to GL 2004-02
- 2006 Chemical Effects Testing
- 10/2010 Close GSI-191

After 9+ years of testing, analysis and design changes,  
What have we learned?




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## Lesson #1

### Know the problem to be addressed and address the problem

- **Bulletin 2003-01 and GL 2004-01 identified an Issue:**
  - Potential susceptibility of PWR recirculation sump screens to debris blockage in the event of a high-energy line break
- **The Problem remains undefined**
  - How to demonstrate that 10 CFR 50.46 regulatory requirements are met




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**Lesson #2**  
**Define acceptable resolution path(s)**  
**for resolving the problem before**  
**defining an acceptable schedule**

- Start with a schedule for determining acceptable resolution paths
- Once resolution paths are defined, then establish the schedule for addressing the problem



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**Lesson #3**  
**If the issue or the problem changes,**  
**pause to reassess**

- Downstream Effects
- Chemical Effects
  - Both concerns significantly expanded the issues to be assessed
- Reassessment is necessary and must consider scheduler impacts and possible regulatory changes



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**Lesson #4**  
**Goal should be reaching reasonable**  
**assurance for the problem; not the**  
**issue subparts**

- The level of conservatism retained for “reasonable assurance” is too easily compounded when applied to individual aspects of the larger issue
- This leads to highly exaggerated results



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## Have These Lessons Been Learned?

1. Know the problem to be addressed and address the problem
2. Define acceptable resolution path(s) for resolving the problem before defining a schedule
3. If the issue or the problem changes, pause to reassess
4. Goal should be reaching reasonable assurance for the problem; not the issue subparts



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## Questions?



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