

GSI-191 Lessons (to be) Learned

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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?**



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

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**

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**

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**

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**

Questions?

