



**RIC 2010**

**Industry Perspective on  
Risk-Informed Technical  
Specification Initiatives**

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**March 11, 2010**



# Overview

- RITS initiative effort began in 1998
  - Combustion Engineering (CE) Owners Group initiated the effort
  - Transitioned to NEI with all owners groups participating
- Promulgation of 10 CFR 50.65 (a)(4) in 1999 provided additional basis for reform
  - Established regulatory requirement for risk assessment and management



## Overview

- Initial RITS efforts were primarily individual completion time extensions
  - Tier 1, 2, 3 controls
  - “CRMP” (tier 3) evolved into (a)(4) guidance
- Regulatory Guide (RG) 1.200 provided foundation for more comprehensive initiatives



# Overview

- RITS has proven to be a successful program
- Nearly all originally envisioned initiatives have been completed
- Several initiatives have been widely implemented



## Challenges

- Initiative 6 (LCO 3.0.3) involves loss of function and is more of a defense-in-depth (DID) challenge even if supported by PRA metrics
- Initiative 1 (hot shutdown end state) is viewed as safety beneficial, but NRC reviews and limitations have been more involved than expected



## Evolution

- PRA scope and capability expectations have evolved with time, as should be expected
- Individual completion time extensions now have very rigorous analysis requirements
- Other initiatives (missed surveillance, mode restraints, barriers, 4B, 5B) are programmatic in nature



## Innovation

- RITS initiatives have successfully piloted regulatory process improvements:
  - RG 1.200 on PRA technical capability
  - PRA peer review use in implementation
  - Consolidated line item improvement process – generic safety evaluation (CLIIP)



## Licensing

- TSTF and CLIP packages have been prepared for initiatives
- Implementation is simplified
- Large fleet submittals simplified through common LAR, procedures
  - STARS, Exelon





## Initiatives 4B and 5B

- Should be sought now by all licensees
  - RG 1.200 needs to be addressed
  - Fire PRA conservatism is not an issue for 5B, and methods development is ongoing to optimize fire PRA for use in 4B
- Use of either initiative, once approved, is entirely voluntary



## Conclusion

- RITS is a successful example of risk-informed regulatory improvement
- Provides value for improved PRA
- NRC has been and continues to be supportive of this effort
- Get your applications in now