

GSI-191: Expectations and Challenges from a PRA Perspective

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Background

- STP submitted an alternative methodology to address Generic Letter 2004-02
- Will use the guidance in RG 1.174 to support the alternative methodology
- Will require modification of the plant's current licensing basis
- Revised licensing basis needs an approach for demonstrating sump screen and in-vessel operability related to debris

NRC Expectations

- Appropriate consideration of uncertainty will be given in the analysis, including a program of monitoring, feedback, and corrective action
- The analysis will contain appropriate safety margin to justify the potential debris sources and will be able to address new information
- Could be a best-estimate with uncertainties approach that demonstrates the sump screen and/or the core do not clog

Defense-in-Depth Expectations

- The NRC expects that the alternative methodology will need to demonstrate that adequate defense-in-depth is maintained
- Demonstration of adequate defense-in-depth may credit operator actions
- Examples from the March 2012 NEI Letter
 - Differential pressure measurement across strainer
 - Capability to backwash

Challenges

- The review of proposed distributions and propagation of their associated uncertainties will be a challenge for the licensee and the staff
- Commission SRM directed staff to revise 10 CFR 50.46c rulemaking to allow risk-informed alternative approach so that an exemption is not required
