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Westinghouse Perspective on Proposed Update Process for Approved Transient and Accident Analysis Methods

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The NRC's Proposed Process Improvement for Licensing Updated Methods Is Worth Pursuing

- Existing review process is time consuming and expensive
- Process improvements are already underway
 - Use of NRC audits to review supporting documentation and better define Requests for Additional Information
- Carefully establishing criteria for when methods updates need prior review by NRC can reduce regulatory burden without adverse impact to safety



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NRC's Opportunity Statement Regarding Methods Updates Has Two Elements

"... vendors and licensees who adopted the process would

be **responsible for re-evaluating key models at certain intervals,**

but may also have the **freedom to update those models without prior NRC approval...**"



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Requirements for Reevaluation and Periodic Updates Must Be Carefully Considered

- Existing regulations guard public health and safety
 - 10 CFR 21
 - 10CFR50 Appendix B
 - 10CFR50.46
- Potential issues with periodic reevaluation and updates, including:
 - Quality and availability of data
 - Impact on industry
 - Vendors update methods
 - Licensees update licensing basis
 - Unintended consequences
 - Added complexity of tracking licensing basis as methods as versions proliferate



Stakeholder Engagement is Key to Success of the NRC's Proposed New Process

- Introducing this topic and having this panel discussion at the RIC is a good first step
- Follow up workshops and dialog between NRC and all stakeholders will facilitate identification and resolution of issues
 - what data sources should be considered
 - when should changes be made
 - what changes can be made without prior NRC approval
 - how should updated methods be implemented