



# Crediting Mitigating Strategies in Risk-Informed Decision Making

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## Overview

- Project History
- NRC's areas of focus
- NRC's progress
- Path Forward

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## Project History

- Fukushima orders required strategies to maintain/restore core cooling, containment, and spent fuel pool cooling
- Licensees installed equipment can be utilized for multitude of uses beyond the orders
- Mitigating Strategies (MS) could provide added safety enhancements
  - The NRC wants to encourage safety enhancements
  - There is a history of systems being used beyond their original intent to enhance safety
- NRC Risk Informed Steering Committee directed effort to evaluate and provide appropriate credit for uses of the equipment in key risk-informed decision making (RIDM) programs
- The Nuclear Energy Institute (NEI) submitted two white papers in December of 2015
  - "Qualitative Assessment for Crediting Portable Equipment"
  - "Streamlined Approach for Crediting Portable Equipment"

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## Project History (2)

- NRC held a public workshop to obtain stakeholder feedback on the white papers
  - ~150 comments from NRC sources
  - 21 major comments discussed
- NEI revised the white papers (May 2016)
- NEI white papers will provide a framework to streamline licensees requests for credit for a number of RIDM applications
- Letter from NRR Office Director (July 2016)
  - The white papers appropriately address a large number of issues important to NRC staff in RIDM
  - Areas of possible concern
- NEI Incorporated the white papers into NEI 16-06, "Crediting Mitigating Strategies in Risk-Informed Decision Making", with additional information on how to credit MS in licensees PRA models

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## Areas for Potential Credit

- Incident Response (Management Directive 8.3)
- Significance Determination Process (SDP)
- Accident sequence precursor (ASP) Program
- Maintenance Rule 10 CFR 50.65 a(4)
- Notices of Enforcement Discretion (NOEDs)
- Risk-Informed License Amendment Requests
- Mitigating Systems Performance Indicators (MSPI)
- Security
- Regulatory Analysis - Rulemaking
- Issue Resolution
- Generic Issue Resolution

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## NRC Progress

- Risk Assessment Standardization Project Handbook Update
  - Covers NRC incident response, SDP, and ASP analyses
- NOED Process
  - Developed technical guidelines
  - Completed process owner training
- Maintenance Rule
  - Revision to Regulatory Guide 1.160 endorsing latest revision of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" forthcoming
- Communications
  - Several public meetings/workshops to discuss project
  - Internal NRC staff communications
  - ACRS briefing

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### Path Forward

- Monitor RIDM program areas for additional application specific guidance changes
- Address any new areas of credit
- Communication
  - NRC internal communication
  - External communication
- Update risk-informed decision making tools
  - Guidance
  - NRC Probabilistic Risk Assessment (PRA) models
- Address Challenges

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