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# **Cumulative Effects of Regulation Risk Prioritization Initiative**

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**May 19, 2015**

# **Benefit Already Obtained**

**Like Notices of Enforcement Discretion two decades ago and Safety Culture more recently, the public discussions between NRC and industry about Cumulative Effects of Regulation and Risk Prioritization Initiative have increased awareness and understanding of the key issues.**

# Goal is Admirable

***NRC staff observed: “In many of the demonstration pilots, there is at least one plant initiative that ranked higher than other regulatory activities due to a “High” rating in Reliability and “Very Low” rating in Safety. In such instances, a licensee may defer a regulatory activity due to the higher ranking of a reliability-related plant initiative.”***

**Neither NRC nor industry has infinite resources. Proper prioritization of items allows both to properly allocate limited resources.**

# **The Challenge**

**How can CER / RPI be used, but not abused?**

**NEI-14-10 provides solid guidance on how to properly prioritize issues.**

**UCS recommends two things to better guard against abuses:**

- 1. Additional ranking factor**
- 2. Better definition of the risk factors**

# **Additional Ranking Factor**

## **NRC comments from its observations of pilot efforts:**

***“The potential process for deferral and elimination of low risk regulatory activities was not exercised by any licensee during the demonstration pilots.”*** and

***“The process in the NEI draft guidance could result in continual deferral or delay of corrective actions.”*** and

***“... the pilot activities did not demonstrate the NEI process for future periodic updates or the inclusion of additional or emerging issues.”***



Red Rusty Boric Acid Deposits on Vessel Flange (12RFO)



Date	Action
3/21/90	Service structure mod initiated
9/27/93	Service structure mod canceled
5/27/94	Service structure mod initiated
3/27/95	Service structure mod tabled
1/07/97	Service structure mod deferred to next outage
9/17/98	Service structure mod deferred to next outage
3/26/04	Reactor restarted after RPV head replaced

# **Additional Ranking Factor**

**NEI 14-10 defines five factors for the Importance Ranking process:**

- **safety**
- **security**
- **emergency planning**
- **radiation protection**
- **reliability**

**A sixth factor, time, must be added to guard against chronic deferrals.**

# Defining Risks

**Risk of what?**

**Non-conforming configuration vs. conforming configuration?**

**Interim or compensatory configuration vs. fixed configuration?**

**Guidance must better articulate do's and don'ts.**

# Defining Risks

<b>Table 4: Comparison Between Industry and NRC Risk Estimates</b>				
<b>Event</b>	<b>Licensee <math>\Delta</math>CDF</b>	<b>NRC <math>\Delta</math>CDF</b>	<b>Risk Difference</b>	<b>Sources</b>
ANO flood protection yellow finding	1.44E-05	1.00E-04	594%	ML14329B209
ANO Stator Drop on Unit 1 yellow finding	4.8E-06	6.0E-05	1,150%	ML14174A832
ANO Stator Drop on Unit 2 yellow finding	1.8E-06	2.8E-05	1,456%	ML14174A832
Browns Ferry Unit 1 RHR Valve red findings	1.0E-06	1.0E-04	9,900%	ML111290482 ML111930432
Fort Calhoun flood protection yellow finding	8.4E-07	3.2E-05	3,710%	ML102800342
Fort Calhoun trip relay contactor white finding	1.0E-06	2.6E-05	2,500%	ML111660027 ML112000064
Indian Point 2 steam generator tube leak red finding	6.6E-06	2.85E-05	332%	ML003770186
Monticello flood protection yellow finding	8.92E-07	3.6E-05	3,936%	ML13233A068 ML13162A776
Oconee safe shutdown facility yellow finding	8.0E-06	1.6E-05	100%	ML102240588
Palo Verde voided ECCS suction line yellow finding	7.0E-06	4.6E-05	557%	ML051010009
Watts Bar flood protection yellow finding	8.15E-09	6.35E-06	77,814%	ML13115A020 ML13071A289

**Cumulative Effects of Regulation / Risk Prioritization can help the NRC staff and industry best allocate limited resources.**

**We support the recommendation to proceed with SECY-15-0050 Option 2.**

**We oppose SECY-15-0050 Option 3 because it is not transparent.**

**Bottom Line**