

NEI/NRC Workshop on ISA Issue Summary NRC Points

Application of Standard Review Plan

Review Process for Balance of Plant vs. License Amendment

Separation of amendment from the ISA Summary to clearly delineate what applies to the ISA Summary and what applies to the amendment.

Baseline Design Criteria

Definition of “new process or facility” and definition of “existing process or facility”.
Industry develop criteria by which you judge it (new accident sequence).

Industry provide perspective for monitoring and control of IROFS.

Industry provide perspective for definition of challenges.

Choice of Items Relied on for Safety

Defense-in-depth items are not required to be included in the license.

Clarify augmented versus enhanced administrative control.

Industry provide perspective on what attributes constitute independence of IROFS.

Natural Phenomena

NRC/Licensee Communications Challenges

NRC develop fuel cycle version of the rules of engagement with industry participation.

Nuclear Criticality Safety Evaluations

NRC Regulation of Chemical Accident Sequences

NRC working on defining “increased radiation risk”.

NRC working on use of TEELs.

NEI/NRC Workshop on ISA Issue Summary Industry Points

Application of Standard Review Plan

Focus of Reviews

As licensees convert to the new regulatory scheme, they want NRC to focus on the new aspects, ISA, management measures, not on review on currently established programs such as RP, NCS.

Communication - PM to licensee when concerns arise (prior to RAI)

Review Process for Balance of Plant vs. License Amendment

Communication - PM to licensee when concerns arise (prior to RAI)

Priority

- License amendments
- License renewal
- BOP

Baseline Design Criteria

BDCs should not be assumed to apply unless the ISA indicates it as necessary.

I&C is an example.

IROFS challenges in an example.

Application of the DBC at the point in time when the ISA is being reviewed is too late.

Choice of Items Relied on for Safety

Define by function.

ISA Summary and IROFS as public knowledge

IROFS Challenge

The initiation of operation of an engineered or administrative IROFS control function that prevents or mitigates an accident sequence initiating event to which the function is designed to protect against. (ISG)

Notes on Margin:

Sufficient margin must be included in the functional boundary to prevent an inadvertent initiation during normal system operation or parameter variance.

Defining the margin provides an assurance that the IROFS will be available and reliable to protect or mitigate the process upset (or off-normal) event which it is designed to protect against.

Note on Safety/Operations Dual Use:

Safety systems may be integrated with operational controls if it can be demonstrated that the sufficient margin exists and that graded management measures are applied to prevent or mitigate the IROFS functional failure.

Natural Phenomena

For category 1 and 3 uranium processing facilities, accidents initiated by design basis threshold event (natural phenomena such as earthquakes, floods, etc.) are protected against sufficiently, and can be assumed to meet the performance requirements when the facility and processes are built to design basis thresholds (applicable building code and siting criteria). (ISG)

Definition: Baseline Design Natural Phenomena Event (see LRS presentation)

NRC/Licensee Communications Challenges

Communication - PM to licensee when concerns arise (prior to RAI)

Rules of Engagement - Has merit, continued discussion needed.

Nuclear Criticality Safety Evaluations

Double contingency = highly unlikely

Execution of the ISA should validate this. (ISG)

NRC Regulation of Chemical Accident Sequences