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July 3, 2007

MEMORANDUM TO: Luis A. Reyes
Executive Director for Operations

FROM: Brian W. Sheron, Director
Office of Nuclear Regulatory Research

SUBJECT: SUMMARY OF THE PROBABILISTIC RISK ASSESSMENT
STEERING COMMITTEE PUBLIC MEETING

The NRC's Probabilistic Risk Assessment Steering Committee (PRASC) held a public meeting on June 19, 2007, with representatives from the Nuclear Energy Institute (NEI), the nuclear industry, and the public to discuss issues related to current risk-informed initiatives. The meeting agenda and attendance list are provided in Enclosures 1 and 2, respectively. The staff noticed the meeting on the agency website on June 4, 2007. This meeting was a followup to the PRASC public meeting held on September 28, 2006.

The Commission encouraged the staff to enhance interactions with stakeholders and to ensure that processes are in place to resolve issues in a timely manner, including raising issues to senior management, as appropriate. As a result, NRC has agreed to hold semiannual stakeholder meetings with NRC senior management on risk-informed and performance-based initiatives.

During the meeting, NEI discussed the need to resolve outstanding issues related to the rulemaking for Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.46a related to risk-informing the large break loss-of-coolant accident (LOCA) and to continue moving the rulemaking forward. NEI committed to interact with the Advisory Committee on Reactor Safeguards (ACRS) to address their issues. NEI emphasized the importance of the rulemaking to the industry as the industry perceived the rulemaking to impact both business and safety. NRC expressed the agency's commitment to proceed with the rulemaking, but also noted that the agency assigned staff resources based on the safety significance. NRC requested the industry to consider providing additional information on how savings resulting from enactment of the rule would benefit plant safety.

NEI indicated that industry PRAs might not meet the required implementation date of January 2008, which is one year from the issuance of Revision 1 to Regulatory Guide (RG) 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities." NEI discussed delays arising from interpretation of the requirements for addressing uncertainty in the American Society of Mechanical Engineers (ASME) Probabilistic Risk Assessment (PRA) Level 1 Consensus Standard. The staff indicated that a public meeting was being scheduled for July 10, 2007, to discuss the uncertainty issue and a proposed *Federal Register* notice which would provide

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further clarification on the treatment of uncertainty. The NRC staff agreed to work with representatives of the Electric Power Research Institute to insure a productive public meeting in July.

NEI requested that additional information on the NRC's State of the Art Reactor Consequence Analysis (SOARCA) project be made publically available so that additional pilot plants would consider participating in the project. NEI referenced a set of questions that they submitted to the staff on November 29, 2006, and asked for the staff's plans to address them. The staff indicated that the response to the questions would be discussed during an upcoming public meeting. The staff noted that the majority of the information regarding the SOARCA project had been discussed during past public meetings. In addition, the staff indicated that they were considering developing and making publically available additional documentation on the SOARCA project.

NEI expressed a continuing interest in using licensee developed PRA models in place of the NRC's Standardized Plant Analysis Risk (SPAR) models for Significance Determination Process (SDP) purposes. The NRC and nuclear industry have met on several occasions to discuss this proposal. NEI noted that the plant-specific PRAs are peer-reviewed and will conform with RG 1.200, which should provide confidence in their results. The NRC staff noted that most of the differences between SPAR and industry PRA results were not due to differences in the models themselves. Rather, the staff attributed the issue to differences in assumed equipment failure probabilities, assumed frequency of failure modes, success criteria, and assumed operator recovery actions. The staff also indicated that having independent confirmatory models available was important, and that they were used for many reasons including regulatory analyses associated with generic issue resolution and rulemakings, the Reactor Oversight Process, and SDP considerations. Nonetheless, the staff agreed to consider a followup meeting on this issue.

NEI discussed various ongoing risk-informed initiatives that were placing continuing demands on their PRA capabilities. In particular, they emphasized on-going activities related to developing fire PRAs in support of adopting NFPA 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants," and general compliance with RG 1.200 in support of risk-informed applications. Despite these challenges, industry expressed continued support for risk-informed initiatives and cited results from internal studies which consistently show that adopting a risk-informed perspective benefits both cost and safety. An example cited was online maintenance, which has resulted in safety systems being better maintained, resulting in improved reliability with concomitant lower costs for maintenance and repair.

The meeting was adjourned at 5:10 pm. Action items resulting from the meeting include:

1. RG 1.200~The staff will work with representatives from the Electric Power Research Institute in preparation for the July 10, 2007 workshop to insure that industry concerns are adequately understood and addressed at the meeting.
2. SOARCA~The staff will consider organizing another public meeting to provide more details about the project to industry.

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3. SDP PRA Models–The staff will consider hosting another public meeting to discuss the use of NRC SPAR models verse industry PRA models for SDP purposes.

Enclosures:

1. Meeting Agenda
2. Attendee List

cc: w/enclosures

E. Leeds, NMSS	J. Dyer, NRR
C. Carpenter, OE	J. Gray, OGC
R. Zimmerman, NSIR	G. Grant, RIII
W. Borchardt, NRO	C. Miller, FSME
J. Wiggins, NRR	F. Eltawila, RES
E. Hackett, NMSS	M. Leach, NSIR
C. Ader, NRO	D. Cool, FSME
M. Cunningham, NRR	G. Holahan, NRO
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*see previous concurrence

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