



Risk-Informed GSI-191 Pilot Application Initial Review Insights

May 23, 2013

Objective:

Provide high level review insights regarding the risk-informed portion of STP's pilot submittal, consistent with the intent of Regulatory Guide 1.200.

Review Area	Regulatory Guidance
<p>1. Risk-informed applications should include a complete list of changes made to the PRA in support of an application, including but not limited to:</p> <ul style="list-style-type: none"> - Changes to basic event values - Changes to mission times - Application-specific Human Reliability Analysis (HRA) summary - Key Assumptions 	<p>RG 1.174 states that “data, methods, and assessment criteria used to support regulatory decisionmaking must be well documented and available for public review.”</p>

Review Area	Regulatory Guidance
<p>2. Risk-informed applications should include a summary of all Facts and Observations (F&Os) identified by full or focused scope peer reviews and their resolution.</p>	<p>Modified PRA should meet guidance in Regulatory Guide 1.200.</p>

Review Area	Regulatory Guidance
<p>3. Risk-informed applications should address <u>all</u> hazard groups (e.g., seismic) and operational modes.</p> <p>A technical justification should be provided if a particular hazard group or operating mode is not germane to the application.</p>	<p>Regulatory Guide 1.174 states that the risk from a hazard group may be treated qualitatively if the licensee can demonstrate that the risk contributions from the hazard group would not affect the decision.</p> <p>Regulatory Guide 1.200, Section 1.2.5 provides acceptable methods for screening seismic and other external hazards from further analysis.</p>

Review Area	Regulatory Guidance
<p>4. Risk-informed applications should clearly identify and describe all methods that have not been previously reviewed and accepted by the NRC.</p> <p>Documents referenced in a submittal but not previously reviewed and approved by the NRC staff should be submitted.</p>	<p>LIC-101 states that NRC staff must “obtain all relevant information needed to make a regulatory decision on a license amendment request that is fully informed, technically correct, and legally defensible.”</p>

References

1. An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis. Regulatory Guide 1.174, Revision 2. May 2011.
(ML100910006)
2. An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities. Regulatory Guide 1.200, Revision 2. March 2009.
(ML090410014)
3. NRR License Amendment Review Procedures. LIC-101, Revision 4. May 2012.
(ML113200053)