

# Westinghouse Perspective on Proposed Update Process for Approved Transient and Accident Analysis Methods

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# The NRC's Proposed Process Improvement for Licensing Updated Methods Is Worth Pursuing

- Existing review process is time consuming and expensive
- Process improvements are already underway
  - Use of NRC audits to review supporting documentation and better define Requests for Additional Information
- Carefully establishing criteria for when methods updates need prior review by NRC can reduce regulatory burden without adverse impact to safety

## NRC's Opportunity Statement Regarding Methods Updates Has Two Elements

“... vendors and licensees who adopted the process would  
be responsible for re-evaluating key models at certain  
intervals,  
but may also have the freedom to update those models  
without prior NRC approval...”

# Requirements for Reevaluation and Periodic Updates Must Be Carefully Considered

- Existing regulations guard public health and safety
  - 10 CFR 21
  - 10CFR50 Appendix B
  - 10CFR50.46
- Potential issues with periodic reevaluation and updates, including:
  - Quality and availability of data
  - Impact on industry
    - Vendors update methods
    - Licensees update licensing basis
  - Unintended consequences
    - Added complexity of tracking licensing basis as methods as versions proliferate

# Stakeholder Engagement is Key to Success of the NRC's Proposed New Process

- Introducing this topic and having this panel discussion at the RIC is a good first step
- Follow up workshops and dialog between NRC and all stakeholders will facilitate identification and resolution of issues
  - what data sources should be considered
  - when should changes be made
  - what changes can be made without prior NRC approval
  - how should updated methods be implemented