

U.S. Nuclear Regulatory Commission Public Meeting Summary

August 12, 2015

Title: Risk Management Regulatory Framework Option 2 – Alternative Risk-Informed Licensing Basis

Meeting Identifier: 20151102

Date of Meeting: Wednesday, July 29, 2015

Location: The Nuclear Regulatory Commission (NRC)
Two White Flint North, Room T-6A01
11545 Rockville Pike
Rockville, MD 20852

Type of Meeting: Category 3

Purpose of the Meeting:

The purpose of the public meeting was to discuss potential implementation details of Risk Management Regulatory Framework (RMRF) Option 2 – Risk-Informed Alternative Licensing Basis. Option 2 is one of three options described in the NRC staff's April 20, 2015, draft white paper entitled, "NRC Staff White Paper on Options for Responding to the June 14, 2012 Chairman's Tasking Memorandum on "Evaluating Options Proposed for a More Holistic Risk-Informed, Performance-Based Regulatory Approach" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15107A402). Potential implementation details of Option 2 were provided in the Attachment to the meeting notice (ADAMS Accession No. ML15189A131) for the July 29, 2015, public meeting.

General Details:

The NRC conducted an open meeting at 8:30 a.m. eastern standard time (EST) where NRC staff, members of the public, and industry representatives discussed possible implementation details associated with RMRF Option 2 - Risk-Informed Alternative Licensing Basis. A list of meeting attendees is provided in Enclosure 1.

Summary of Presentations:

The staff presented the slides in Enclosure 2 on RMRF Option 2 and on a possible approach for ensuring the suitability of the probabilistic risk assessments (PRAs) used to implement Option 2. There were specified intervals after each presentation allotted for information exchanges between NRC staff and meeting attendees. This time was used by NRC staff to answer questions or concerns expressed by industry representatives and other participants.

Discussion:

Mr. Michael Tschiltz, of the Nuclear Energy Institute (NEI), stated that the additional information provided by the NRC on Option 2 did not change the industry's previous conclusion that the regulatory and technical uncertainties associated with Option 2 were so large that industry could not support the option. Bob Rishel, representing the Boiling Water Reactor (BWR) Owners Group, stated that the PRA capabilities of the various BWR licensees varied significantly and those with more highly developed PRAs might have some interest in Option 2 but that others were unlikely to support the approach. Roy Linthicum, representing the Pressurized Water Reactor (PWR) Owners Group, stated that some PWR licensees might also have interest in Option 2. Joseph G. Giitter, of the NRC staff, noted that if only a few licensees were likely to be interested, expending the resources to conduct rulemaking was not likely to be justified.

The NRC staff then discussed a possible PRA "certification" approach that could potentially be used to ensure that a PRA is suitable for use in risk-informed applications. Industry representatives stated that certain aspects of the "certification" approach (PRA practitioner training and qualification, etc.) were already addressed by the Institute of Nuclear Power Operations programs. Industry representatives did express some interest in a "pre-approved PRA" but believed that it should be developed by enhancing the existing peer review process. Industry representatives acknowledged that there were areas where the existing peer review process should be improved. The key improvement areas, in industry's view, were determination of acceptable methods and resolution of peer review findings. Victoria Anderson, of NEI, estimated that a risk-informed steering committee working group was already addressing 85 to 90% of the needed improvements. Joseph G. Giitter (NRC) asked industry representatives to compile a list of the "gaps" where improvement was needed.

The NRC staff said it was re-opening the public comment period on www.regulations.gov under Docket NRC-2013-0254 until August 17, 2015, to allow submittal of additional comments on Option 2 and on the possible approach for ensuring suitability of PRAs for risk-informed applications. Industry representatives requested that the comment period be extended beyond August 17, 2015, to allow for collecting and incorporating additional industry input. The NRC staff agreed to extend the comment period until August 31, 2015.

Additional Information:

- Meeting Notice: ML15189A131
- Meeting Summary: ML15216A650
- List of Attendees: ML15217A285
- NRC Staff Presentation Slides: ML15217A290

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The NRC staff then discussed a possible PRA "certification" approach that could potentially be used to ensure that a PRA is suitable for use in risk-informed applications. Industry representatives were not supportive of the "certification" approach, although they did express some interest in a "pre-approved PRA" approach developed by enhancing the existing peer review process. Industry representatives acknowledged that there were areas where the existing peer review process should be improved. The key improvement areas, in industry's view, were determination of acceptable methods and resolution of peer review findings. Victoria Anderson, of NEI, estimated that a risk-informed steering committee working group was already addressing 85 to 90% of the needed improvements. Joseph G. Giitter (NRC) asked industry representatives to compile a list of the "gaps" where improvement was needed.

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