

1. Clarify document to note that NRC guidance as opposed to licensees decide the processes in which qualitative PRA credit can be considered.
2. Include a paragraph that communicates differences between terms such “FLEX,” and “Mitigating Strategies” etc. to ensure that all stakeholders have a common understanding on the scope of the document.
3. Clarify that qualitative risk insights cannot be used in lieu of quantitative risk inputs. Current NRC process guidance are clear about various applications where qualitative and quantitative guidance can be used.
4. Provide additional specificity to the scope of “other” equipment this guidance should cover (e.g., B5b?) or omit sentences that refer to “other equipment”. Staff believes that crediting “off-site FLEX equipment” should be out of scope.
5. If possible, include summaries of ongoing or planned industry initiatives which will enable licensees to incorporate qualitative insights into time critical applications such as NOEDs, MD 8.3s, and SDP with minimal challenges on timeliness.
6. Section 5.2: Clarify what is meant by “reactivity control.”
7. Section 5.2: Clarify which containment functions – isolation, cooling, venting - for DHR.
8. Avoid using language that a licensee might use to conclude that complying with NEI-12-06 leads to PRA credit (The document has done this in a number of places. However, there are few more areas where a reader who is unfamiliar about PRA may be misled.)
9. Section 7: Time seems to be the most relevant factor to industry in determining operator reliability. Other PSFs such as complexity, frequency of training for the specific scenario, quality of procedures, context specific experience need to be considered and are arguably more important performance drivers.
10. Add a paragraph that clearly explains how scenario specific cognitive human errors should be addressed.
11. Pre-deployment may help with maintenance risk assessment a(4) or NOED but should be excluded for SDP, as conditions were not previously known and equipment was not pre-deployed. Clarify language.
12. Section 8.1: Industry and NRC need to establish some standard that staff and industry can align on, to agree on the level of qualitative credit that may be given to “written instructions.” Use the discussions that will occur during the public workshop to consider adding additional language that will assist NRC staff and licensee reach alignment during time critical applications such as NOEDs, MD 8.3, and SDPs.

13. Section 8.1: NRC and licensees should establish alignment on quality and frequency and the degree of qualitative credit appropriate for the applications. This topic should be discussed at the public workshop.