



# **Mitigating Strategies Significance Determination Process – IMC Appendix O**

Meeting with Industry

May 18, 2016

## Background

- Multi-disciplined team established
- Diverse views on SDP development
- Decision to use screening approach with a transition to IMC 0609 App M for findings that do not screen to Green
- Draft procedure reviewed by regions with substantive comments
- Cross Regional Panel informed by draft App O during early TI-191 performances

## Key Considerations

- App O focuses on FLEX equipment, procedures, strategies and training
- Most findings expected to be either minor or very low safety significance (Green)
- When findings affect situations other than Mitigating Strategies, decision needed to enter appropriate SDP
- Experience needed to better understand how FLEX equipment may be used for other purposes

## How Does App O Work?

- It's a risk-informed screening tool that focuses on...
  - Equipment deficiencies that result in a complete loss of function to cool the core, containment or spent fuel pool for greater than 72 hours
  - Procedure and training deficiencies that would result in loss of function(s) underlined above
  - External hazard frequencies are documented to be greater than 1E-6/year
  - Significant programmatic deficiencies in two or more areas exist
  - Spent fuel pool level wide range level instrument findings screen to Green

## Next Steps

- Address regional/industry comments
- Issue App O in June/July
- Validate App O through TI-191 performances
- Develop technical basis document
- Develop minor/more than minor examples for IMC 0612 App E