

ENCLOSURE 3
Staff's Position
Meeting Summary of the
5/2/16 Meeting with
Industry
DATED JUNE 1, 2016

Staff's Position on NEI Guidance for Resolution of Peer Review F&Os, NEI Guidance on Approach for Acceptability of New PRA Methods

Public Meeting

May 2, 2016

Working Group

- Staff position drafted by working group:
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Background

- NEI has proposed guidance for process to
 - Close out peer review findings and observations (F&Os) using an approach that involves an independent technical review of the licensee's proposed resolutions
 - Accept new PRA methods using a Vetting Panel approach that would be comprised of NRC and industry members and who would review the method for acceptability
 - Vetting Panel recommendation (i.e., analysis) would be provided to NRC for review and endorsement
- Staff developed position on acceptable process

Staff Position Purpose

- Purpose of staff position is to communicate to stakeholders the staff expectations regarding an acceptable process to:
 - Close out peer review F&Os
 - Accept new PRA methods
- By providing a staff position, it should help industry formulate their approach with an understanding of staff's expectations and therefore result in little to no exceptions when staff performs its review and endorsement

Staff Position Development

- Industry guidance will ultimately be reviewed and endorsed in RG 1.200
- Draft staff position started with staff position in RG 1.200 on “Consensus PRA Standards and Industry PRA Programs” and “Documentation to Support a Regulatory Submittal”
 - revised to address resolution of peer review F&Os and acceptability of new PRA methods

PRA Standard Peer Review

- Some clarifications have been added
 - Peer review process
 - Team qualifications
 - Documentation

F&O Technical Review

- One approach is for industry to perform a technical review to determine whether the resolution of the F&O (proposed by the licensee) has adequately resolved the identified deficiency in the PRA
- Technical review can be performed to address F&O for a specific application or for “all” applications

Staff Position: F&O Technical Review

- Acceptable F&O technical review approach
 - Performed according to an established process
 - Performed by qualified personnel
 - Documents the results
- Characteristics and attributes are provided for each of the above

F&O Technical Review Goal

The implementation of this staff position is intended to provide the needed confidence in the results of the PRA standards peer review such that when used in support of an application, the review will require fewer RAIs and less resources expended by the staff and licensee. Thus, the staff will be able to focus their review on the use of the PRA in the context of the application, the key assumptions, and the areas identified by peer reviewers as being of concern and relevant to the application. Consequently, this staff position will provide for a more focused and efficient review process.

New PRA Methods

- PRA standard either
 - Provides requirements for acceptable methods, or
 - Specifies acceptable methods
- PRA peer review:
 - Evaluates whether the state-of-practice method or the specific method has been correctly implemented
- May be methods that are not considered state-of-practice or specified in standard AND have not received NRC acceptance or endorsement

Definition of New Method

*The NRC has not clearly accepted the identified method's use in the base PRA or for the specific risk-informed application for which it is proposed. If the NRC has accepted for the specific risk-informed application, there is an available published basis summarizing NRC's acceptance.**

**There are fundamental methods and approaches that are accepted as state-of-practice but have not necessarily been formally accepted by the NRC.*

New PRA Method Acceptability Approach

- Industry has proposed an approach that employs a “Vetting Panel” Process
- The Vetting Panel Process
 - Would assess whether the Vetting Panel Process is appropriate to address the new method, and if so,
 - Assess whether the new method is acceptable and provide their recommendation (analysis) to NRC for review and endorsement

Staff Position: New PRA Method Acceptability Approach

- Acceptable Vetting Panel approach
 - Performed according to an established process
 - Has established decision and acceptance guidelines
 - Performed by qualified personnel
 - Documents the results
 - Identifies submittal guidance
- Characteristics and attributes are provided for each of the above

Vetting Panel Approach Goal

The implementation of this staff position is intended to provide added confidence in the new method such that when used in support of an application, the review will require fewer RAls and less resources expended by the staff and licensee. Thus, the staff will be able to focus their review on the use of the PRA in the context of the application, the key assumptions, and the areas identified by the vetting panel and PRA standard peer reviewers as being of concern and relevant to the application. Consequently, this staff position will provide for a more focused and efficient review process.

Staff Position: Regulatory Submittal Documentation

- Archival documentation guidance is sufficiently broad to cover F&O resolution and new PRA method processes
- Licensee submittal documentation
 - Guidance added on what should be included in submittal regarding F&O resolution and any new methods

Path Forward

- Pilots performed to test the process
 - Staff position may be revised based on insights from the pilots
- NRC staff developing internal guidance process to support NRC participation in the Vetting Panel process
- This internal guidance would also be tested as part of the pilots