

NEI 05-04/07-12/12-06 Appendix X: Close Out of F&Os

After the host utility has resolved the F&Os from a peer review, they may undertake a review process to confirm close out of those F&Os. This appendix describes the close out confirmation process and associated configuration management.

X.1. Close Out of F&Os Process

The host utility has several options to achieve permanent close out of their F&Os. Options include: Peer Review, NRC Review, and Independent Assessment.

X.1.1. Close Out F&Os in a Peer Review

In this option, the host utility performs another full or a focused-scope peer review, to be conducted in accordance with the peer review guidance in this document [e.g. NEI 05-04]. During the new peer review, as part of the peer review scope, a new peer review team determines whether the previous F&Os covered by the scope of the new review have been addressed adequately to be closed out, and if

To close out previous F&Os through a peer review, the host utility should:

- Address the F&Os in question prior to the on-site review.
- Document resolution of the F&Os to the peer review team prior to the on-site review.
- Ensure that the scope of the review (e.g. HLR, hazard group) covers the portion of the PRA affected by the existing F&Os.
- If a previous peer review was not completed under the current regulatory guidance, complete a gap assessment.

Following conduct of the new peer review, the previous F&Os within the scope of the peer review are considered closed, and need not be addressed in risk-informed applications of the PRA. The supporting requirements (SRs) affected by those F&Os are also reassessed as part of the peer review, and previous assessments of in-scope SRs as less than Capability Category (CC) II are no longer relevant.

X.1.2. Close Out F&Os by NRC Review

A utility may choose to pursue NRC review to close out F&Os. If the utility is submitting an application for a risk-informed licensing application, it may be possible for the utility to close out F&Os through the review of that application such that those F&Os need not be addressed in future risk-informed licensing applications.

To close out the F&Os in question through an NRC application, the host utility should:

- Address the F&Os in question prior to the application submittal.
- Specify in the submittal that close out of these F&Os by NRC is requested as part of the application review.
- Submit documentation of the F&O resolution to the NRC with the application.

The NRC will document acceptance of the F&O resolution on the public docket as part of the application review.

X.1.3. Close Out F&Os by Independent Assessment

A utility may choose to close out F&Os by independent assessment. An independent assessment is conducted in a manner similar to a peer review, but with a scope limited to evaluating the closure of F&Os identified by the host utility, and no new F&Os are issued.

In selection of member(s) for the independent assessment group, the following apply:

- Every member of the independent assessment group should be independent of the PRA associated with the F&Os being reviewed, per the criteria of “independent” in the ASME/ANS PRA Standard. These members may be contractors, utility personnel, or employees of other utilities.
- Every member of the independent assessment group should meet the relevant peer reviewer qualifications for the PRA associated with the F&Os being reviewed.

The independent assessment group will review the documented F&O closure as prepared by the host utility. The independent assessment group should be allocated space to perform their work, access to the host utility PRA team, and be given access to the plant for an on-site visit if requested. The independent assessment group will decide if the F&Os in question have been adequately addressed and can be closed-out, using the appropriate parts of the ASME/ANS PRA Standard for the review criteria. Additionally, once F&Os that were associated with a given SR assessed as less than CC II have been closed out, the affected SRs may be re-assessed by the independent assessment group.

The scope of the independent assessment group review is limited to the F&Os and associated SRs requested for close out by the host utility. The independent assessment group may not provide new F&Os, but may some F&Os remain open if the closure is deemed to not be complete

At the end of the independent assessment, the independent assessment group should provide a final report. The independent assessment final report should consist of a list of the independent assessment group’s decisions for each F&O and affected SR, along with each of

the independent assessment members' resumes and experiences in peer reviews. This information should be stored by the utility for documentation.

If a focused scope peer review is occurring, a concurrent independent assessment group may be formed to close out F&Os not within the scope of the focused peer review. Members of the peer review group may also be on the concurrent independent assessment group.

X.2. Closed-Out F&O

Once an F&O is closed out, the utility should not be required to present and explain them in peer reviews, NRC applications or other requests excluding NRC audits. Additionally, closed-out F&Os are considered irrelevant to the current PRA model. The host utility should keep the documentation and close out process for each F&Os on file.