

## **NRR-DRMAPEm Resource**

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**From:** Weerakkody, Sunil  
**Sent:** Friday, August 16, 2019 12:13 PM  
**To:** Miller, Ed  
**Cc:** Dinsmore, Stephen; Reisi Fard, Mehdi; Zoulis, Antonios; Drouin, Mary; Levine, Michael; Vasavada, Shilp  
**Subject:** my slides for the public meeting on 8/21  
**Attachments:** NewMethods-08-21-weerakkody.pptx  
  
**Importance:** High

Ed,

I have attached my slides. Please upload to meeting notice and make them publicly available.

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**Hearing Identifier:** NRR\_DRMA  
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**Subject:** my slides for the public meeting on 8/21  
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**From:** Weerakkody, Sunil

**Created By:** Sunil.Weerakkody@nrc.gov

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# **Feedback on Alternative to Administrative Technical Specification of TSTF. 505 Revision 2**

Sunil Weerakkody, Senior Level Advisor  
Division of Risk Assessment  
August 21, 2019



# OBJECTIVES

- Provide feedback on NEI's proposed TS for TSTF-505 Rev. 2
  - Communicate NRC expectations on high-level attributes of proposal.
  - Begin the discussions to reach alignment on details of the proposal.



## Note

Discussion of NEI Proposal does not constitute implicit or explicit endorsement of the proposal.

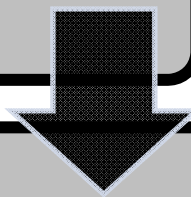


# NEXT STEPS

Senior Level Advisor consults with subject matter experts and process owners and provide recommendation to the NRR\DRA Division Director (Process started, Expected Completion: 9/13/2019)

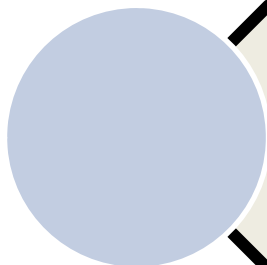


Division Director of NRR\DRA provides recommendation to NRR Office Director (Target: 9/30/2019)

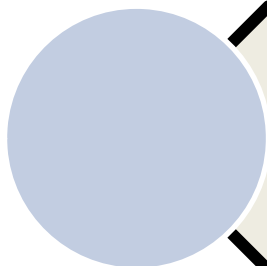


Based on the outcome of NRR\DRA Office Directors' Decision, staff will complete remaining actions except update to RG 1.200 (Target: January 31<sup>st</sup>, 2020)

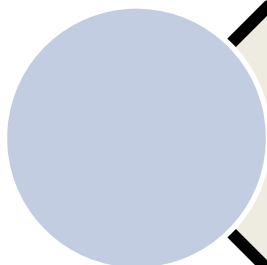
## Activities to be completed prior to making Recommendation to NRR Office Director



NRC receives an update to NEI 17-07 which will be suitable for staff review and potential endorsement with clarifications as necessary. That revision, when incorporated by reference to the alternative Tech Spec that NEI proposes, will require review of newly-developed methods using review requirements and definitions acceptable to NRC staff and provides a mechanism to communicate to the NRC staff the results of industry review of these methods.

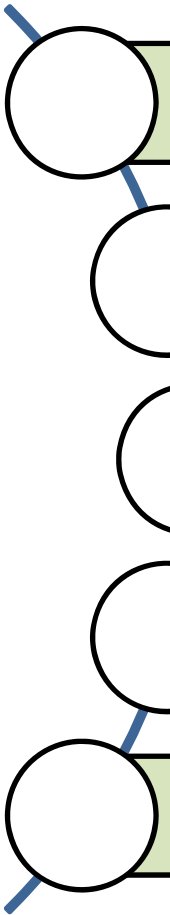


NRC receives a document, either from NEI or from the Owners Groups, that provides the key definitions as well as requirements which are sufficient to form the basis to demonstrate the acceptability of newly developed methods.



NRC receives a revised proposal for the alternative Tech Spec that has addressed NRC feedback.

# **Follow-Up Activities to be Completed by 01/20/2020 (except RG 1.200 update (FY 2020?) (Conditional to Office Director Approval)**



Prepare letter documenting NRC staff position on the t revised NEI-17-07 (with necessary clarification) for interim use, or, revise and issue Rev. 3 to RG 1.200 expeditiously to accomplish the same objective.

Provide a knowledge management document that articulates licensing and oversight strategies for Tech Spec 4b (and other Risk-Informed Initiatives) to NRC inspection staff.

Prepare letter documenting NRC staff position on an NEI or PWROG document that contain review requirements and key definitions for PRA methods, or, revise and issue Rev. 3 to RG 1.200 expeditiously to accomplish the same objective.

Develop an Office Instruction that articulates roles and responsibilities on how NRR would support responding to industry reports relating to newly developed PRA methods .

Revise inspection procedure(s) that enable NRC to inspect and enforce the process that requires use of review requirements for newly-developed methods, as well as other important attributes (e.g., key assumptions). Also, develop and “socialize” example Violations and Performance Deficiencies



# NEI Proposal:

## (Next Slide Provide Staff Expectations [A]-[F])

e. A RICT must be calculated using the following PRA and non-PRA methods [A] approved by the NRC, including [list specific PRA and non-PRA methods used for fire and seismic analysis (e.g., Fire PRA and Seismic Margins Analysis)]. Changes to these PRA and non-PRA methods [A] require prior NRC approval. The PRA maintenance and upgrade process [B] will validate that other changes to the PRA models used in the RICT program, including changes involving newly-developed methods [C], follow the guidance [D] in Appendix 1-A of ASME/ANS RA-Sa-2009 [E], "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," Regulatory Guide 1.200, Revision 2 [F], "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and NEI 17-07, Revision 1X, "Performance of PRA Peer Reviews Using the ASME/ANS PRA Standard."



# Expectations on High-Level Framework

- [A]- replace by term “approaches”
- [B]- upgrade process must require incorporation of a newly-developed method to prompt a focused scope peer-review.
- [C]- develop and publish an unambiguous definition to “newly-developed” method.
- [D]- use of “review requirements,” must be “requirements” not “guidance.
- [E] – This version is dated. A current document that includes review requirements is necessary.
- [F] – This version is dated. A current document that reflects new requirements is necessary.

## NEI Proposal & Feedback for Discussion

(f) A report shall be submitted in accordance with Specification [5.6.X]..

### Questions:

- Who will be submitting the report?
- Who will be the recipient\s of the report?
- Who\how will review fees apply?
- How can NRC avoid need for unnecessary\repetitive reviews?
- How many should we expect per year?



## Feedback for discussion

### Items [A] and [B] Discussed in Next Slide

*5.6. x: A report shall be submitted following each PRA upgrade involving a newly-developed PRA method and the associated peer review, [A] and at least 60 days prior to using the upgraded PRA to calculate a Risk Informed Completion Time in accordance with Specification [5.5.18]. The report shall describe the scope of the upgrade, including [B](1) the PRA models upgraded and newly developed methods used, (2) the peer review and finding closure reports available to the NRC for oversight and inspection activities, (3) the number of, and characterization of, the open findings remaining in the upgraded model, and (4) identification of any RICTs of less than 30 days calculated to change by more than 50% for the zero-maintenance configuration.]*



# FEEDBACK FOR DISCUSSION

**[A]** – Reference to time limits (....60 days) must be deleted because they may appear to imply staff acceptance/approval after that time period. Furthermore, NRC plans to leverage existing ROP framework to schedule any necessary follow-up inspections which may not be amenable to any time limits.

**[B]** – Additional discussions are necessary to determine the content of the reports so that the content meets NRC expectations w/o unduly burdening licensees.

# NEXT STEPS

- Receive revised version of NEI Proposal.
- Hold workshop to align on details of implementation identified in Slide 11 and other items identified on 8/21.

