

NRR-DRMAPEm Resource

From: Miller, Ed
Sent: Tuesday, August 20, 2019 9:43 AM
To: Miller, Ed
Subject: Slides for Aug 21, 2019, public meeting
Attachments: Two slides on NEW METHOD peer review HLRs and SRs for 8_21_2019 industry meeting.pptx; Review of NEI 17-07 - Aug 21 2019 public meeting.pptx

Attached are Mehdi and Steve's slides for the subject public meeting.

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Some Areas Of Emphasis for Newly Developed Method Peer Reviews

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NDM Peer Reviews (1/2)

- New Method High level requirements and supporting requirements are stabilizing and being finalized
- Expertise to address some SR may require subject matter experts
 - (NM-B1) “technical bases .. are founded on ... established ... engineering principals”
- F&O closure (Appendix X ?) completed before method reported and used
- Modifications to “traditional” HLR and SR dispositions both in the self-assessment and the peer review (next slide)

NDM Key Assumptions (2/2)

- Modifications to “traditional” HLR and SR dispositions both in the self-assessment and the peer review
 - Expectation that the basis for a “met” requirement is fully summarized in the basis
 - The self-assessment should provide the method developers justification of why the SR is met and reference to supporting information in the report
 - The peer review basis should provide the peer reviewers justification of why the SR is met
- F&O identifying weakness and proposed solutions may be the same as the current F&Os

Review of NEI 17-07

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August 21, 2019



Timeline of NEI 17-07 Review



Dec. 2017

NEI 17-07 Rev.
A was issued
(ML17341A548)

Dec. 2018

Two public
meetings
were held
(ML17341A548)

May-Jun. 2019

Three pilot peer-
reviews of NDMs

Aug. 2019

NEI 17-07 Rev. 2
was issued
(ML19228A242)



NRC provided
comments
(ML18313B246)

Dec. 2018

NEI issued Rev. A
(ML18352B305)

Dec. 2018

NRC provided
comments
(ML19206A092)

Jul. 2019



Comments on NEI 17-07, Rev. 2



- NEI 17-07, Rev. 2 allows use of NDMs with open finding level F&Os
 - “ ... if a newly developed method is **deemed not technically acceptable** in the report, a utility may not use it in a PRA supporting risk-informed licensing applications. If the method is **deemed technically acceptable**, but if one or more finding level F&Os are issued in the report, the utility will need to **justify the use of the method with these open findings** in any risk-informed licensing applications.”
[emphasis added]

Importance of Closing NDM Open Findings



- Peer-reviews determine whether requirements of the Standard are met; framework for NDM to be “deemed acceptable” is unclear
 - “The standard requires a peer review process that identifies and assesses where the **technical requirements of the standard are not met.**” [RG 1.200]
- Unclear how licensees/peer-review of implementation can justify use of NDM with findings (considering lack of expertise, detailed knowledge of NDM, etc.)
- Review of findings by staff may expand the scope of review to other aspects of methodology
- NDM documentation issues may be important as those issues potentially impact implementation of NDM

Other Comments on NEI 17-07



- Page 17: **limited** self-assessment of the IEPRA for Internal Flood, Fire, and external hazard PRAs
- Page 23: “beyond a sampling process” was removed
- Page 28: Assigning UAM for use of NDMs with findings was removed
- Page 34: “ ... the peer review report should be provided to the NRC by the method developer, with licensee-specific information removed as necessary”
 - Methods submitted will be made publicly available with appropriate redaction of proprietary information
 - Method developer has no regulatory requirements to provide the reports
- Confusion on the use of “External” and “Other” hazards