

### Establishing a Backstop at the Cross-Cutting Area Level (Evaluation of Cross-Cutting Aspects 2009-2013)

Using the same data used to analyze individual cross-cutting aspects assigned by plant year from 2009-2013, this analysis was performed by cross-cutting area. The average, median, and 95<sup>th</sup> (97<sup>th</sup>)(99<sup>th</sup>) percentile results are shown below.

	Human Perf	PI&R
Average	7.88	3.60
Median (50%)	7	3
95%	18	9
97%	19.46	11
99%	26.64	18.92

A backstop of 20 findings in a year with a human performance cross-cutting aspect and 12 findings in a year with a PI&R cross-cutting aspect would affect, roughly, a little less than 3% of sites in a given year. Raising the backstop to 25 and 18 would affect just over 1% of sites.

- Are there any plants meeting these backstop thresholds that aren't hitting the new SCCI threshold of 6?

Human Performance (20)			Problem Identification and Resolution (12)		
Site (year)	6 CCAs?	SCCI?	Site (year)	6 CCAs?	SCCI?
Cooper (2009)	H.4(a)	Yes	Cooper (2011)	P.1(c)	Yes
Cooper (2011)	H.1(b), H.4(a)	Yes	Diablo Canyon (2010)	P.1(c)	Yes
Cooper (2012)	H.1(b)	Yes	Fort Calhoun (2012)	P.1(c)	*
Fort Calhoun (2012)	H.1(a), H.1(b)	*	Fort Calhoun (2013)	P.1(c)	*
Fort Calhoun (2013)	H.1(b)	*	Palo Verde (2009)	None	Yes
Grand Gulf (2012)	None	No	SONGS (2010)	P.1(c)	Yes
Palisades (2011)	None	Yes	Wolf Creek (2009)	P.1(c)	Yes
Prairie Island (2009)	H.2(c), H.4(b)	Yes	Wolf Creek (2010)	P.1(c), P.1(a)	Yes
SONGS (2010)	H.1(a), H.4(b), H.4(c)	Yes			
Wolf Creek (2009)	Only in PI&R	Yes			

\* Not assigned SCCIs while under IMC 0350

From the table above, Grand Gulf would have hit the backstop threshold without hitting the 6 CCAs, and was not assigned an SCCI at the time. Palisades and Palo Verde did not reach the threshold of 6 CCAs in a given year, but were assigned an SCCI.