

DSI-12

(13)



## NRC STRATEGIC ASSESSMENT AND REBASELINING INITIATIVE

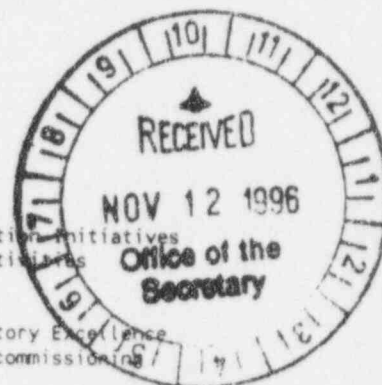
## DIRECTION SETTING ISSUE COMMENT FORM

NAME Glenn KellyPHONE NO. (301) 415-3028AFFILIATION NRC

## PLEASE CHECK ONLY ONE:

- ☐ DSI 2 - Oversight of the Department of Energy  
☐ DSI 4 - NRC's Relationship with Agreement States  
☐ DSI 5 - Low-Level Waste  
☐ DSI 6 - High-Level Waste  
☐ DSI 7 - Materials/Medical Oversight  
☐ DSI 9 - Decommissioning - Non Reactor Facilities  
☐ DSI 10 - Reactor Licensing for Future Applicants  
☐ DSI 11 - Operating Reactor Program Oversight  
☒ DSI 12 - Risk-Informed, Performance-Based Regulation

- ☐ DSI 13 - Role of Industry  
☐ DSI 14 - Public Communication Initiatives  
☐ DSI 20 - International Activities  
☐ DSI 21 - Fees  
☐ DSI 22 - Research  
☐ DSI 23 - Enhancing Regulatory Excellence  
☐ DSI 24 - Power Reactor Decommissioning  
☐ General



## COMMENT:

Option 1. The current process is clearly not responsive to individual utility initiatives to use PRA to better define ~~which~~ what work needs to be done at a particular plant. One example is the 89.10 program. There is little incentive to the staff to use PRA. Deterministic criteria are easier to set + review. There are many reviewers available to evaluate deterministic criteria, but few for PRA criteria. In addition NRC Technical Branches appear unwilling at times to work together to deal with some of the hard

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PRA / Technical problems. Perhaps with the  
workloads on the staff it is ~~just~~ much easier  
to just review something using <sup>deterministic</sup> ~~past~~  
<sup>criteria.</sup> ~~rather than~~



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### COMMENT:

One cannot perform risk informed evaluations for specific plants unless one understands where the risk lies. The NRC has stopped performing full PRA reviews that can provide ~~input~~ (audit) <sup>adequate</sup> confidence that ~~the~~ a plant-specific PRA models an area accurately / completely enough to be used to help make licensing and regulatory decisions.

I believe we either have to do risk-informed regulation at only the highest / ~~macro~~ <sup>macro</sup> level, or we will have to ① perform detailed PRA reviews or ② mandate PRA performance using prescriptive methods and appropriate data.



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### COMMENT:

NRR ~~could~~ ~~is~~ ~~potential~~ has less than 15 staff who have ever completed the review of a full PRA. Only a few of these are still doing PRA work. The NRC's PRA training program cycles staff through so slowly + staff work with risk-informed submittals so infrequently that they quickly become poorly qualified to deal with sophisticated ~~detailed~~ risk-based submittals by licensees. How will NRC change its training program and staff/manager culture so that staff are capable of reviewing and understanding risk-based submittals?