

Role of RG 1.200 In FLEX evaluation and reviews.

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Compliance with RG 1.200

- RG 1.200 is complied with via endorsed NEI guidance describing independent review of the PRA against the ASME/ANS PRA Standard.
- RG 1.200, Rev. 2 endorses two types of independent review
 - full scope peer review for PRAs of new hazards and
 - focused scope peer review of an upgrade
- RG 1.200, Rev. 3 will endorse two new types of independent review
 - an independent review of F&O resolutions
 - a peer review process of newly developed methods
- RG 1.200 requires a PRA Configuration Control process to provide confidence that the PRA adequately represents the as-built, as-operated plant.

Definition of Upgrade in ASME Standard

- PRA upgrade (2009 Standard): the incorporation into a PRA model of a new methodology or significant changes in scope or capability that impact the significant accident sequences or the significant accident progression sequences. This could include items such as new human error analysis methodology, new data update methods, new approaches to quantification or truncation, or new treatment of common cause failure

Definition of Upgrade in Draft Revision 3 of RG 1.200

- 1. application of a PRA method previously used in the peer reviewed plant PRA that
 - a. causes one or more supporting requirements in a national consensus PRA standard to be applicable that were not applicable in the previous peer review (i.e., including changes in capability category; or
 - b. is being applied in a different context
- 2. application of a method not previously used in the peer reviewed plant PRA that
 - a. is a consensus method or an NDM that has been subjected to an NDM peer review or,
 - b. has been developed separately from a state-of-practice method or involves a fundamental change to a state-of-practice method (i.e., an NDM)

FLEX Modelling and RG 1.200

- Independent peer reviews and F&Os (weaknesses) are only needed following an PRA upgrade
- If FLEX modelling is maintenance and not an upgrade, there will be
 - no peer review of any newly developed methods
 - no focused scope peer review of the implementation of FLEX in a PRA
 - no F&Os or F&O closure review
- PRA maintenance guidance can be satisfied if the plant has a process that ensures that changes to the as-built, as-operated plant are identified, tracked, and included when necessary