



Treatment of FLEX in Risk-Informed Licensing Applications

Introduction

- RG 1.200 provides the NRC's regulatory position relative to PRA technical adequacy for risk-informed licensing applications
 - Includes those used for integration of FLEX equipment into licensee PRAs.
- 2017 NRC memo outlined position on NEI 16-08
 - Detailed departures of NEI 16-08 from RG 1.200
 - Was anticipated since NEI 16-08 was developed for a wide range of potential approaches, including activities other than licensing applications.

Introduction

- Even when using approaches to integrating FLEX into PRAs that align with RG 1.200, licensees have still run into difficulties
 - Limerick TSTF-505: 19-part RAI on FLEX equipment
 - Several other plants receiving RAIs of similar scope
 - Hope Creek 50.69: RAI requesting plant-specific operating experience and test results for FLEX
- RAIs of this nature are not isolated
- Meeting objective: Determine licensee actions that can best address these issues proactively in LARs

Generic FLEX RAI Topics

- What is the purpose of RAI questions regarding whether or not FLEX equipment or actions are credited?
- What is the purpose of RAI questions on consistency with ASME/ANS PRA Standard, as this is addressed for the full PRA, including FLEX?
- Will the PWROG FLEX data report issuance will make questions regarding plant-specific data obsolete?

Generic FLEX RAI Topics

- What is the purpose of RAI questions that specifically inquire about the HRA process for FLEX?
- What is the purpose of RAI questions regarding whether or not FLEX constitutes and upgrade?
- What is the purpose of RAI questions related sensitivity studies specifically for FLEX items?

Additional Discussion Topics

- Licensees have also received RAls relative to not crediting FLEX
- Unclear if these questions are necessary to write the SE
- A new peer review is not necessarily needed after incorporation of FLEX into a licensee's PRA



Path Forward

- Work towards regulatory stability for treatment of FLEX in risk-informed licensing applications
- Establish well-understood use of RG 1.200 for addressing use of FLEX in licensee PRAs supporting risk-informed licensing applications
- Develop generic language for LARs to reduce effort expended on RAIs