

# Public Meeting Risk-Informed Process for Exemptions

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# Introduction



- Industry appreciates the continued effort to focus NRC and licensee resources on the most safety significant issues
- We are seeing the application of the VLSSIR process improvements implemented in January
- We are encouraged by the NRC's efforts to address very low safety significant compliance issues in a manner consistent with the Principles of Good Regulation
- A streamlined approach that leverages our advanced understanding of plant risk is appropriate

# Insights Regarding RIPE Process

- Development of streamlined licensing actions using a risk-informed approach is appropriate
- Further consideration of issues discussed at May 14, 2020 public meeting
  - Examples of issues that could be used with RIPE
  - Entry criteria
  - Risk evaluation
  - Streamlined licensing actions
  - NRC's streamlined review process



# Potential Areas for Use of RIPE

## Exemptions

Part 20, Part 26, Part 74

## Amendments

Conformance to ANSI, IEEE and Regulatory Guides, or Clarification of DB or CLB

# Entry Criteria: Leveraging Risk-Informed Initiatives



- We fully support leveraging work done in previous risk-informed initiatives, where appropriate:
  - The proposal identifies 50.69 and TSTF-505 based on the Integrated Decision-Making panel (IDP) under 50.69 and PRA technical acceptability under TSTF-505
  - Consideration should be given to allowing use of a TSTF-425 IDP, and a TSTF-425 PRA which has a technical acceptability evaluation
  - The NRC should also consider a graded approach informed by the rigor of the PRA and the issue being evaluated
- This should not prohibit or limit the use of other risk insights when assessing a condition

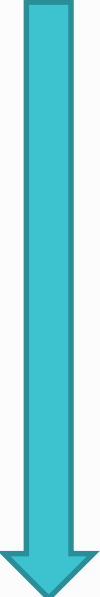
# RIPE IDP Composition



- Using the TSTF-425 IDP as a model, an appropriate RIPE IDP would consist of:
  - Engineering Manager
  - Maintenance Manager
  - Operations Manager (ideally SRO qualified)
  - Risk Management (PRA) Engineer
  - Work Control/Work Management Representative
  - Systems Engineering Representative
  - Safety Analysis Representative
  - Licensing Representative

# Comparison of PRA Acceptability by Program

Increasing  
PRA  
Rigor



	Internal Events PRA	Internal Fire PRA	External Hazards PRA
RIPE	Capability Category I (Screening)	Qualitative or N/A	Qualitative or N/A
TSTF-425	Capability Category II	Qualitative/ Bounding	Qualitative/ Bounding
TSTF-505	Capability Category II	Capability Category II	Site specific (Qualitative/ Bounding or Capability Category II

# RIPE Risk Evaluation – Screening Considerations

- Consider use of absolute change in risk as basis
- Remove “more than minimal” and “risk significant” criteria given lack of context or clear definition
- A criteria of “degradation” instead of “any impact” is more appropriate
- Reconsider treatment of defense in depth and safety margins in cases where the PRA appropriately reflects the issue being evaluated
- The cumulative risk approach referencing the PSA Applications Guide is not appropriate - RG 1.174 criteria are more appropriate

# Streamlined Licensing Actions



- There are benefits in the use of the RIPE process for both streamlined exemption requests and streamlined license amendment requests
- Allowing both types of licensing actions would allow broader use of the RIPE process that could be used to address potential areas and issues described earlier

# Conclusion



We appreciate the NRC's risk-informed approach to address issue of low safety significance which helps focus NRC and licensee resources on the most safety significant issues