

Summary of Remaining October 2020 NRC Comments on NEI 20-09

Note: Comments not included in this table were fully addressed in the text of the document.

Page	Comment/Text	Discussion
4	NRC proposed added text: Each PRA at each stage of design, construction, or operation that the user elects to have a peer review done is considered to be a different PRA and a distinct (i.e., separate) peer review.	This is more appropriate for the licensing document.
5	NEI 17-07, Revision 2, includes discussion and specific items related to cross-reference from internal fire PRA SRs to internal events PRA SRs. Those items do not appear in NEI 20-09. Justification for their deletion is not apparent, especially because the discussion in NEI 17-07, Revision 2 is applicable for the ANLWR PRA Standard. Suggest retaining the discussion from NEI 17-07, Revision 2, (with any changes to SRs cited therein) unless a straightforward justification can be provided for exclusion.	For ANLWRs, back referenced SRs are not used in the same way. They will be limited so the language in NEI 17-07 is not appropriate.
7	Section 3.3 from NEI 17-07 is missing from NEI 20-09. The underlying guidance remains valid for ANLWRs. Suggest retaining Section 3.3 from NEI 17-07 unless a justification for its exclusion can be provided.	The way the ANLWR is structured, the full section 3.3 is not needed. Will add a sentence to 3.3 to note how referenced SRs are addressed but not the full section 3.3.
9-10		Various added NRC text edited for clarity
10	If the host user cannot achieve confidence in the qualification of the peer reviewers for the PRA scope determined by the user and/or peer review of newly developed method(s), NRC review of the PRA scope and/or newly developed method(s) should be considered.	Does not belong in a guidance document, this is outside the peer review process.
10	PRA standard (section 6.2.3) states a minimum of 5 members	This is being removed. No change made.
11	NRC added text: Section 6.2.3 of the ASME/ANS Advanced Non-LWR PRA Standard discusses the team size requirements.	This is being removed from the LWR standard and will likely be removed from the ANLWR standard as well.
11	Review team member qualifications	Edited to address NRC comments
13	SQUG walkdown training should be retained	NRC suggested deletion of this previously. Either is acceptable to industry.
13	NRC added economic impact modeling	Not being done in the USA, deleted
15	Various comments on Figure 1-1	Deleted Figure 1-1

24	Suggested language adds applicability from RG 1.200 to ANLWRs. Further, it is suggested that this reference is revisited based on whether RG 1.200 is the appropriate reference or the anticipated DG for ANLWRs.	Deleted section
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