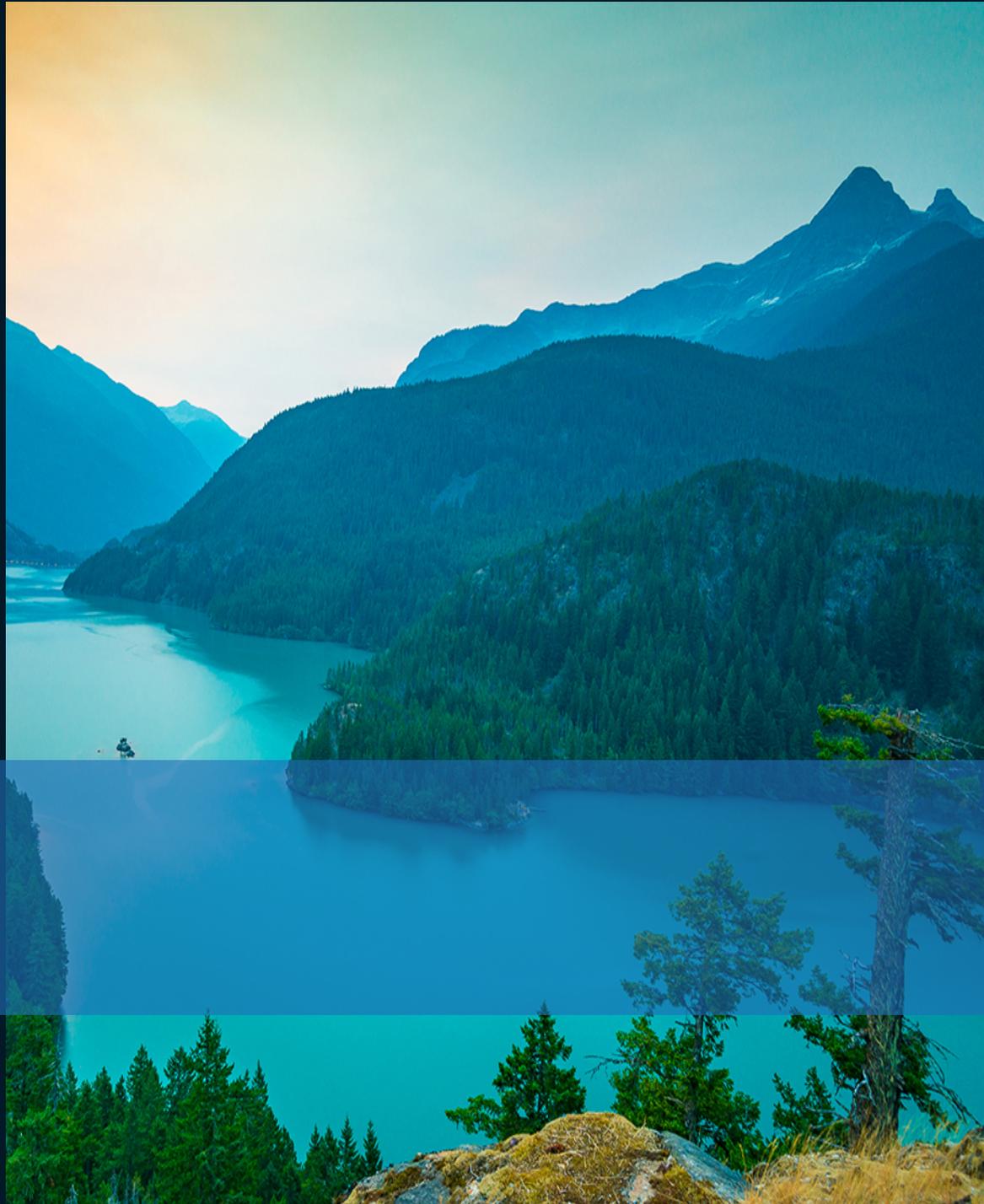


Industry Perspectives on Oversight of PRA Configuration Control

February 2, 2022



Introduction

- Industry appreciates opportunity to engage with NRC staff regarding interface between PRA configuration control and inspection of risk-informed programs
- Existing inspection procedures for major risk-informed programs cover PRA configuration control
 - Industry does not believe a new inspection procedure is needed
 - Possible enhancements to consider
 - ◆ More explicit discussion in current inspection procedures
 - ◆ Additional staff participation from NRR
 - ◆ More explicit and consistent requests for PRA configuration control information
- Licensees can support enhancements with information, as needed
- Consistent with other inspection programs, should remain focused on compliance
- Interested in understanding NRC staff perspective on PRA configuration control as related to support of risk-informed programs

- 02.04 Review of Licensee’s Feedback and Process Adjustments:
 - a. **Verify the licensee** reviews changes to the plant, operational practices, operating experience, and **updates the PRA and categorization or treatment process in a timely manner.**
 - c. **...The PRA should be maintained and upgraded,** when appropriate, as described in the ASME/ANS PRA Standard endorsed by the latest revision of Regulatory Guide 1.200. All aspects of the integrated, systemic process used to characterize SSC importance must reasonably reflect the current plant design, operating practices and applicable plant and industry operational experience. **Inspectors should verify that the PRA maintenance and upgrade procedures requirements are being accomplished by the licensee.**

IP 71303, Technical Specifications

- **02.03.e Verify that the licensee has complied with plant procedures in place for control of the PRA for implementing an SFCP, as required by the approved methodology specified in TS administrative control Section 5.5**
- **02.04c. Verify that the licensee has plant procedures in place for developing an adequate PRA for implementing Risk Managed Technical Specifications (RMTS) encompassing risk informed completion times for required actions...as required by the approved methodologies specified in TS administrative control Section 5.5, if the licensee has adopted RMTS.**
- **02.04d. Verify that the licensee has complied with plant procedures in place for implementing RMTS as required by the approved methodologies specified in TS administrative control Section 5.5, if the licensee has adopted RMTS and/or an SFCP.**

Potential Licensee Input to Support of Inspection of Risk Informed Programs

- NRC request for specific information could assist in current inspection procedures
- Examples
 - PRA configuration control procedures
 - Sampling of design control procedures
 - Sampling of procedure change control procedures
 - PRA change database
 - Includes evaluation of changes and expected impacts
- Should work to avoid duplication with other inspection processes