

Risk-Informing License Renewal – Other Possibilities and Continued Discussion

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Recap of RIC Presentation & Background

- STP was proof-of-concept pilot for risk significance categorization, 50.69 predecessor
- STP has categorized over 100 plant systems in terms of nuclear safety risk (GQA) and plant generation risk (PGR)
- Component risk categorization provides a technical basis for treatment of components commensurate with their safety and operational significance
- STP plans to apply alternative treatment for GQA Low and Non-Risk Significant components (RISC-3 and RISC-4), engineering evaluations would be performed for RISC-2 components
- Each AMP will be evaluated for risk-informed potential

Goals and Benefits

- Goal: apply the appropriate resources to components commensurate with their nuclear safety significance
- Benefits:
 - Focus resources on items with the most safety significant components
 - Increased availability of SSCs due to removal of prescriptive special treatment requirements in lieu of adequate and more efficient alternative treatments and a reduction in outage time during the performance of AMP requirements
 - Improved ALARA performance
 - Reduced station burden for AMPs

Next Actions – Preparing for the Change

- Creating procedure for performing AMP evaluations
 - Guidance for tracking, implementation, and documentation of alternate treatment actions and activities
 - Ensures industry and station OE pertaining to age-related degradation reviewed and factored into evaluations
 - Guidance and responsibilities for AMP-specific alternate treatment implementation and maintenance

Next Actions – Preparing for the Change

- Documented position in internal white paper
 - Comparative evaluation assessing applicability of the STP exemption from special treatment requirements to risk-informing aging management programs
 - License renewal and aging management are special treatment requirements
 - Risk insights can be used to evaluate aging management programs
 - Conclusion: STP can risk-inform procedures and processes to implement Exemption allowances for all station programs, as applicable and appropriate.

Other Potential Applications and Issues

- Applying risk insights to additional parts of License renewal
- Equipment Qualification mentioned in License Renewal correspondence RAI response
- Lack of exact/specific guidance or clear precedence – justifiable, but different
- Want to be transparent in our actions – what is the appropriate vehicle for communicating this change?
- 50.59 evaluation – would be subject to inspection, reported in biennial update
- Future discussion in public forum?