

NEI Meeting Handout

Regulatory Issue Resolution Protocol (RIRP)
Pilot Project on Submerged Medium Voltage Cable

July 30, 2009

RIRP/MVC Screening

<u>Screening Factor</u>	<u>Result of Industry Screening</u>	<u>Range of Outcomes</u>
Safety significant? [<i>Affect on deterministic accident analyses (fuel clad, RCS boundary, containment)</i>]	No – redundant cables; redundant systems	Yes No
Risk significance	Low – random; isolated; not a common mode	High Medium Low
Maintenance Rule Implications?	Yes	Yes No
Active compliance issue?	Yes	Yes No
Potential impact on operability?	Yes	Yes No
Potential shutdown issue (e.g., LCO)?	Yes	Yes No
Degree of complexity	High (cable types; environment; application; acceptance criteria)	High Medium Low
Initial NRC/Industry agreement?	No	Yes No

Problem Statement

A lack of mutual understanding of the regulatory bases associated with programmatic requirements for submerged medium voltage cables results in increased regulatory uncertainty and burden.