

Overview of Revisions to NEI 14-10 “Guidance on Prioritization and Scheduling Implementation”, Rev. 0

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Purpose

- To provide a high level overview of significant changes made to Draft NEI 14-10, dated October, 2014
- Revision based on:
 - Comments from NRC staff
 - Industry feedback from pilot lessons learned

NRC Comments

- NEI received over 100 documented comments from NRC staff based on initial review of the guidance document, as well as feedback provided to industry at the September 8, 2014, public meeting
- Majority of comments focused on revising or adding wording that served to further clarify guidance and enhance focus on public safety

Section 1.1 “Purpose”

- Section revised to include additional wording to stress the use of the importance characterization process to capture the broader safety significance of any issues being considered
- Additional wording included to ensure factoring of quantitative risk information in issue characterization when available
- Sentence added at bottom paragraph providing wording on reliability improvements having direct and indirect benefits on nuclear safety

Section 1.1 Cont'd

- Subsection added under Section 1.1 titled, “Additional Guidance on Scope of Prioritization” that includes examples for when prioritization process should and should not be used, as follows:
 - An immediate action necessary for continued safe operation (e.g., to support NRC finding of adequate protection, or to restore compliance with a Technical Specification, or to resolve an environmental compliance issue with an adverse effect on public health and safety, or to remove a threat to personnel safety) should not use the prioritization process.

Section 1.1 Cont'd

Section 1.1 Cont'd

- General O&M, facilities maintenance, etc. would not use the prioritization process. This is expected to be budgeted separately from those items subject to prioritization. To the extent that the same skilled personnel resources may be required, implementation should not adversely impact the scheduling of Priority 1 activities.
- Some major initiatives that typically receive detailed corporate financial evaluations such as license renewal, extended power uprate, and steam generator replacements may not be appropriate for this prioritization process since they are implemented on their own cost-benefit.

Figure 1-1

- For Figure 1.1 “Plant Process for Schedule Prioritization”, wording was revised to identify the specific ROP cornerstone associated with the decision attributes

Section 2.0

- Under Section 2.0 “Generic Assessment Expert Team (GAET), and Plant Integrated Decision-Making Panel (IDP)”, considerable wording was added to:
 - Further define the minimum level of functional expertise required for the GAET (Ops, Engineering, Safety, PRA and Licensing)
 - Describe additional personnel GAET can call upon to assist in characterization of issues (SMEs, external consultants, etc.)

Section 2.1

- In Section 2.1, additional wording was added throughout the section to clarify how documentation and records will be maintained by the licensee for further NRC or industry review

Section 2.2

- For Section 2.2, retitled “Important Attributes of the Process”, wording added to clarify what elements should be considered in each step of the process
 - Step 1 “Ensuring the issue and success criteria are well defined” – additional wording focusing on issues being appropriately defined and communicated
 - Step 3 “Considering uncertainty” – wording added to address impact of specific issues, such as external events, uncertainty and risk

Section 2.2 Cont'd

- Step 4 “Considering the need for additional information” – clarification provided on pursuing additional information
- Step 5 “Evaluating the overall nature of the risk impact of a potential action” – retitled and wording added for evaluating nature of risk, wording on FLEX moved to Step 6
- Step 6 “Identifying the overall extent of the impact of an individual issue when considering other issues” – clarification wording added for considering the impact of other issues; wording added to address FLEX

Section 2.3

- For Section 2.3 “Types and Models of Evaluation Tools”, additional clarification provided on PRA as an evaluation tool, indicating the level of quality for a tool being used for characterization of an issue and when not to use a less formal or qualitative approach

Section 2.4

- Section 2.4 “Evaluation”:
 - Wording added to address the change in scope to a regulatory issue requiring NRC approval
 - Paragraph added providing guidance to evaluate a prioritized issue by breaking it down into different parts in order to assign the highest priority to those specific changes that offer the greatest (and soonest) risk reduction

Figures 3.1 & 3.2

- Figure 3.1 “Progressive Screening and Evaluation Safety Importance (Generic)” revised
- Figure 3.2 “Progressive Screening and Evaluation Safety Importance (Plant-Specific)” revised
 - Refer to guidance for both

Section 3.0 “Safety Importance Characterization”

- Under Step 1 (Screening for any impact), additional wording added to define and provide examples to be considered regarding “capability”
- Under Step 2 (Screen for more than minimal impact), wording added for considering risk significance and uncertainty

Section 3.0 Cont'd

- Step 3B (determining high, medium, low, or very low safety importance using quantitative analyses), information was added to ensure safety importance determination is consistent with the SDP
- Section was modified throughout to include the need to consider the risk significance when evaluating criteria

Section 4.0

- Section 4 “Importance Characterization of Other Categories”, opening paragraph was revised to include the following sentence:
 - The primary objective of this characterization is to capture the significance of the issue that was not already captured under the factors considered under safety.

Section 4.0 Cont'd

- Step 1 (Screening for any impact) under Security, “threat” has been replaced with “significance” where applicable
- Figure 4.1-1 “Security Issue Importance Determination Flowchart” revised extensively (refer to guidance)
- Figure 4.1-2 for Cyber deleted and included in revised Security Flowchart (4.1-1)

Section 4.2 for EP

- Additional wording provided under Step 1 (Screening for impact) under Section 4.2
 - **1) Activity to maintain or restore compliance with current EP requirements?**

Answer “Yes” if the activity is necessary to maintain or restore compliance with current emergency preparedness regulations or the site Emergency Plan (as defined in Regulatory Guide 1.219).

- 1a) Activity in response to an NRC finding?
- 1b) Is finding significance greater than Green?

Section 4.2 Cont'd

- **2) Activity to achieve compliance with a new EP requirement?**

Answer “Yes” if the activity is necessary to achieve compliance with a new emergency preparedness regulation or related guidance.

- **2a) New EP requirement supports implementation of a RSPS?**

Answer “Yes” if the new EP requirement is associated with implementation of one or more of the four Risk Significant Planning Standards (RSPSs) discussed in NRC Inspection Manual Chapter 609, App B, *Emergency Preparedness Significance Determination Process*.

- **2b) New EP requirement supports implementation of a PS?**

Answer “Yes” if the new EP requirement is associated with implementation of one or more of the non-RSPSs discussed in NRC Inspection Manual Chapter 609, App B; these are referred to simply as Planning Standards (PSs).

Section 4.2 Cont'd

- 3) Non-routine activity?

Answer “Yes” if the activity cannot be adequately addressed or controlled through normal work practices or processes such as a corrective action program or work control. Attributes of such an activity may include the need for a project team and/or budget to address anticipated complexity, cost, duration or needs of multiple stakeholders.

Figure 4.2-1

- Figure 4.2-1 “EP Issue Importance Determination – Step 1” flowchart revised
 - Refer to Figure 4.2-1 in guidance

Section 4.3 “Radiation Protection”

- Section 4.3 was provided with all new text describing the process to be used for prioritizing RP issues with particular emphasis on Figure 4.3-1 RP Issue Importance Determination Step 1, which has also been revised
 - Refer to Section 4.3 and Figure 4.3-1 in guidance

Section 4.5 “Reliability”

- Wording was added to this section focusing on improvements to safety-related equipment, including examples
- Wording added to further clarify the need to facilitate a proactive process to identify and schedule activities with a nexus to safety (e.g., unplanned scrams or power outages) well before approaching a PI threshold rather than a reactive process once an issue has been so far postponed in consideration of other regulatory driven activities that it becomes a regulatory issue itself

Section 5 “Aggregation to Determine Priority”

- A paragraph was added that serves to further define the approach to prioritizing issues as well as the correlation of issues receiving a priority based on HIGH importance in safety and its equivalence to importance received in Security, EP, RP or reliability

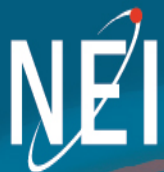
5.1 “Scheduling”

- Section was revised to provide direction on dedication of resources in order of priority
 - Resources are dedicated to the lower priorities once the impact to higher level priorities has been properly evaluated to ensure no impact on higher priorities

Section 5.1 Cont'd

- Under “Tie-Breakers within Priority Level and Other Considerations”, wording was added to first bullet to address procurement, with the following two bullets added:
 - Other considerations, including impact on personnel safety and personnel productivity, such as operator burden or burden on maintenance and security staffing
 - Under some circumstances, the IDP may conclude that a substantial impact on operator burden, for example, may be cause to change the Priority level up or down. In such cases, the basis should be documented.

Questions?



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