

Industry Comments on RG 1.247

NRC Public Meeting

November 3, 2021



Introduction

- Appreciate rapid staff action to endorse ASME/ANS PRA standard and NEI 20-09 peer review guidance
- Endorsement of NEI 20-09 without exception is very valuable to end users of these documents
 - Result of strong cooperation between NRC staff and industry.
- Stakeholder concerns with some staff clarifications on the ASME/ANS ANLWR PRA standard
 - Detailed in today's presentation

Specific Comments on Staff Clarifications – Human Reliability

- Addition of feasibility studies (e.g., HR-G1)
 - Not appropriate
 - Redundant to existing requirements
 - Too much of a “how to” for a standard
- Expectation of consideration of acts of commission (e.g., HLR-HR-E)
 - Not consistent with current state of practice

Specific Comments on Staff Clarifications

- References

- Addition of references to Regulatory Guides and NUREGs (e.g. HR-D4)
 - Not appropriate for SRs
- Reference to “EPA or industry guidance” instead of “regional guidance” for weather data (e.g. RCME-A3)
 - Applicable guidance will vary depending on where standard is used
 - Best available should be used

Specific Comments on Staff Clarifications – Added Expectations

- Addition that “all stages of licensing process should address low power and shutdown types of evolutions” (e.g. POS A-1)
 - Belongs in regulatory guidance, not the SRs themselves
- Added proof expectation for SHA applicability (e.g. SFR-C1)
 - No additional discussion should be necessary
- Clarifications on Non-Mandatory Appendices and notes
 - Only requirements should be endorsed and clarified
- Discussion on absolute vs. relative risk significance (RI-N-1)
 - This portion is Non-mandatory and should not be part of the endorsement

Specific Comments on Staff Clarifications

– Miscellaneous

- Non-endorsement of reporting thresholds (e.g. RI-N-3)
 - Important aspect of PRA in any licensing process
 - These SRs should endorsed
- Expectation of documentation of evaluation of all previous risk informed decisions when updating (CC-E1)
 - Out of scope for a standard
 - Belongs in application regulatory guidance

Next Steps

- NEI to provide detailed, written comments to NRC
- NEI, NRC, and ASME/ANS to cooperate to best support ANLWR stakeholders