



Considerations for a Future Risk Informed Regulatory Framework

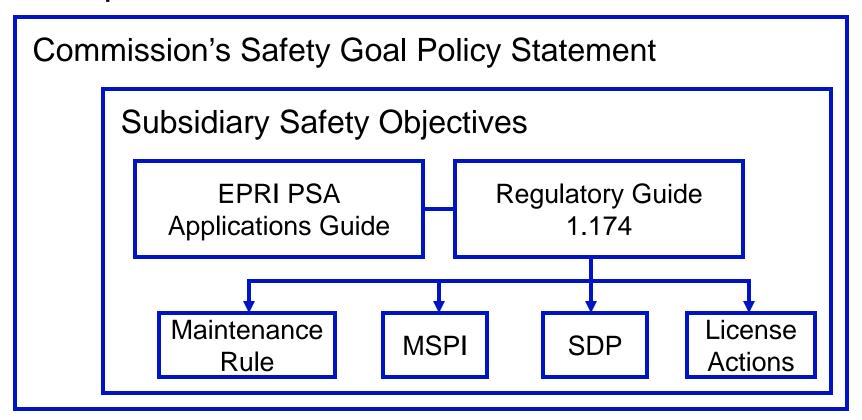
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Nuclear Regulatory Commission Briefing October 14th, 2010

Basis for Existing Metrics

Acceptable Level of Risk



Consistent application promotes safety & performance



Actual Risk Profile of New Plants

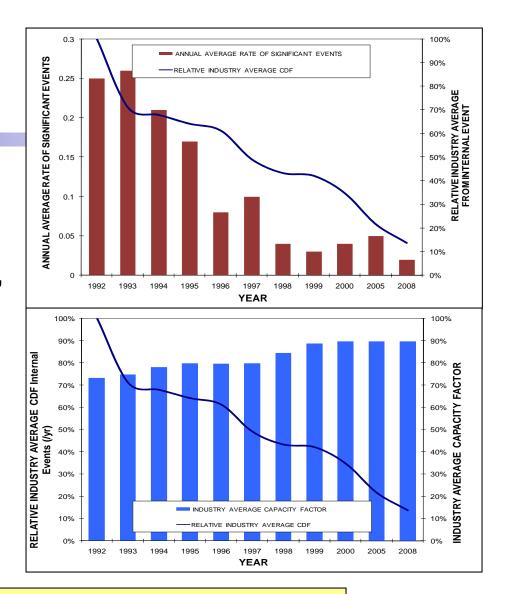
- Design PRAs are necessarily incomplete
 - No operating experience
 - Field routing
 - Seismic risk and other hazards require as-built information
- Most new plant applications did not risk-inform technical specifications or other operational programs

Experience with As-Built, As-Operated Plants
Needed to Address Risk Metrics



Win – Win – Win

- Existing plant risk metrics are very successful
- Metrics developed following understanding of "risk picture"
- Metrics have:
 - Encouraged increased margin permanent
 - Granted increased flexibility rarely used
- Operators, regulator and public – all winners



If Risk Margins Have Value, They Will Be Maintained or Increased



Future Risk Metrics

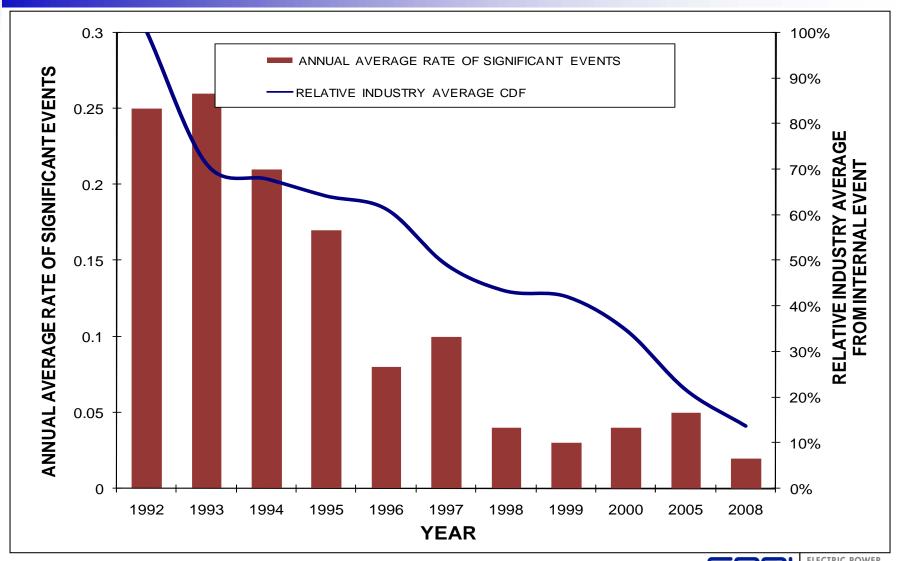
- Any future risk metric
 - Should preserve the "win win win" established by previous metrics
 - Should encourage the ability to react in the margin and correct declining trends
 - Should provide continued focus on significant issues
- The current risk metrics have these attributes

In the Absence of Contravening Data, Current Risk Metrics are Adequate



Backup Material

Annual Average Significant Events and Internal Events CDF



Annual Average Internal Events and Capacity Factor

