Enclosure 4
Streamlining 50.69 Licensing
Nuclear Energy Institute
Meeting Summary of the 8/18/2016
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Streamlining 50.69 Licensing

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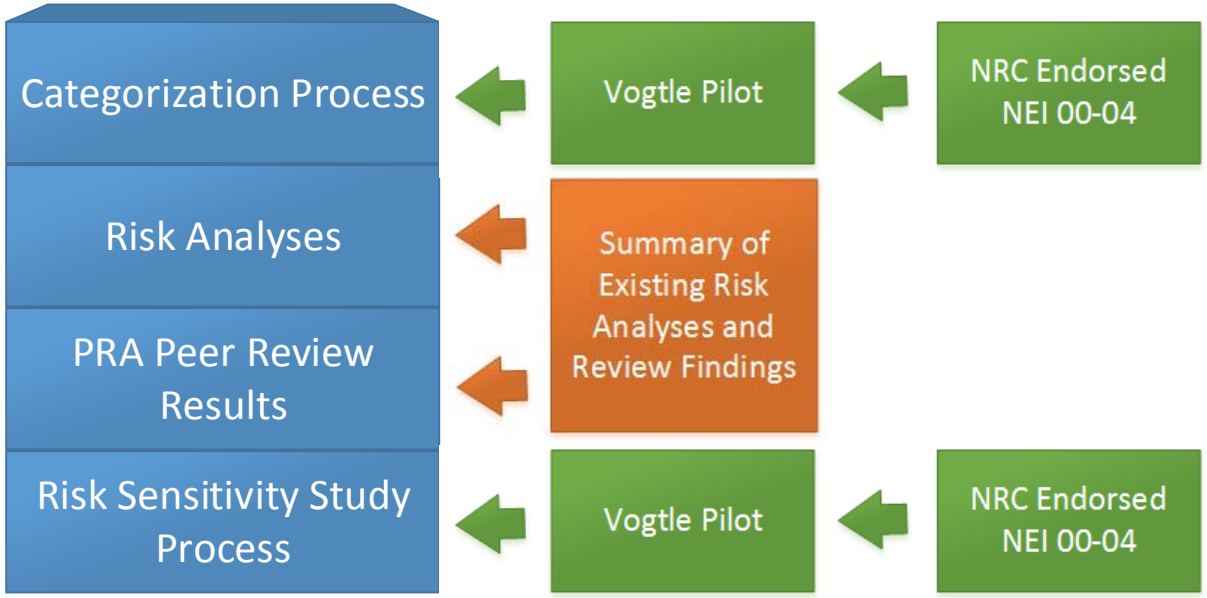
The Big Picture

- Streamline and coordinate industry submittals and NRC review for 50.69 to optimize resources
- Success Requirements:
  - Accepted streamlined process
  - Adherence to process

Summary of Streamlining LAR from Pilot

- Credited RG 1.201 categorization and sensitivity study process
- Used passive categorization process approved in Vogtle submittal
- Included all submittal requirements specified in 10 CFR 50.69
- Credited peer review and categorization processes for treatment of uncertainty

Elements of the Technical Evaluation



Streamlined Discussion on Categorization and Sensitivity Study Process

- Both requirements for categorization and the processes of sensitivity studies are detailed in NEI 00-04 endorsed through RG 1.201
- Passive categorization will be the same process accepted by NRC for the Vogtle Pilot
  - Submittal will discuss this clarification but will reference the justification provided by the pilot

Alternate Treatments

- Submittal will not discuss alternate treatments
- License amendment request is limited to the categorization process consistent with the rule language

PRA Scope

Areas Needed to be Addressed

Options to Address	Internal Events	Fire Risk	Seismic Risk	Other External Events	Shutdown Risk
	Internal Events and Internal Flooding PRA	**IPEEE Fire**	**IPEEE Seismic**	**IPEEE Screening**	**Shutdown Defense in Depth**
		Fire PRA	Seismic PRA	Other External Events PRA	Shutdown PRA

Minimum Requirements for 50.69

PRA Technical Adequacy

- Model Summary
- Description of PRA maintenance and update process
- Summary of open Peer Review findings and self assessment gaps
  - Evaluation of impact of open peer review findings
  - Description of how other findings were closed against the base model
  - Closure documentation available for audit
  - Request NRC closure of findings against base model (optional)

Streamlining PRA Review

- Template provides two options
  - Request NRC to utilize a review of a previous risk informed application to reduce required resources
  - Request NRC to do a common review for 50.69 and another risk informed application either done in parallel or in the future
- Addressing linked submittals
  - Neither of these options should be considered a linked RLA under LIC 109 as the approval of one submittal is not dependent on the approval of the other

Technical Adequacy of Other (IPEEE) Risk Analyses

- Confirm IPEEE results are adequate for categorization and represent the as-built, as-operated plant, and operating practices
  - Evaluate current plant design and operating practices for impact on the results of the FIVE/SMA/External Hazard analyses
  - Describe how changes will be addressed in the categorization process

BACKUP SLIDES

License Amendment Requirements by Rule

(2) A licensee voluntarily choosing to implement this section shall submit an application for license amendment under § 50.90 that contains the following information:

(i) *A description of the process for categorization of RISC-1, RISC-2, RISC-3 and RISC-4 SSCs.*

(ii) *A description of the measures taken to assure that the quality and level of detail of the systematic processes that evaluate the plant for internal and external events during normal operation, low power, and shutdown (including the plant- specific probabilistic risk assessment (PRA), margins-type approaches, or other systematic evaluation techniques used to evaluate severe accident vulnerabilities) are adequate for the categorization of SSCs.*

(iii) *Results of the PRA review process conducted to meet § 50.69 (c)(1)(i)(iv)*

(iv) *A description of, and basis for acceptability of, the evaluations to be conducted to satisfy § 50.69 (c)(1)(iv). The evaluations shall include the effects of common cause interaction susceptibility, and the potential impacts from known degradation mechanisms for both active and passive functions, and address internally and externally initiated events and plant operating modes (e.g., full power and shutdown conditions).*