## ATTACHMENT 11

# PRA IMPLEMENTATION PLAN ACTIVITY TABLE (March 1999)

# 1.0 REACTOR REGULATION

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
1.1	STANDARD REVIEW PLANS FOR RISK-INFORMED REGULATION	Develop standard review plans (SRPs) to be used in risk-informed regulatory decisionmaking.	IST ISI TS	4/97 C <sup>2</sup> 4/97 C 8/97 C 4/97 C	NRR /RES	
			* Transmit final SRPs to the Commission for approval:  General IST ISI TS  Update and revise SRPs: General IST GQA TS ISI	1/98 C 3/98 C 12/99 3/98 C 6/99 8/99 8/99 8/99 12/00		(Note 1.1)

<sup>&</sup>lt;sup>1</sup> See Abbreviations Table at the end of this report

<sup>&</sup>lt;sup>2</sup> C = Task previously completed

Regulatory Activity Objectives Methods Target Lead Schedule Office(s)	Status (this quarter)
1.2 PILOT APPLICATIONS FOR RISK-INFORMED REGULATORY INITIATIVES  1. Motor-operated valves 2. IST requirements 2. Dano here 3. ISI requirements 4. Graded quality assurance (GQA) 5. Maintenance Rule 6. Technical specifications 6a. Commission approval 6b. Pilot amendments Issued 7. Other applications to be identified later (e.g., applications related to diesel generator start times and hydrogen monitoring, on the basis of Task Zero' of the Risk-Informed, Performed, Perform the staff position in NUREG-0737 for hydrogen monitoring, on the basis of Task Zero' of the Risk-Informed, Performance-Based Regulation Pilot Regulation Pilot remove hydrogen recombiners  7. John Onfore request to remove hydrogen recombiners	Completed (Note 1.2a) Changed (Note 1.2b) Completed

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	Regulatory Activity	Objectives		Methods	Target Schedule	Lead Office(s)	Status (this quarter)
1.3	INSPECTIONS	Provide guidance on the use of plant-specific and generic information from individual plant examinations (IPEs) and other plant- specific PRAs.	*	Develop IMC 9900 technical guidance on the use of PRAs in the power reactor inspection program	6/97 C	NRR	
		piant- specific PRAS.	*	Revise IMC 2515 Appendix C on the use of PRAs in the power reactor inspection program	7/97 C		
			*	Propose guidance options for inspection procedures (IPs) related to 50.59 evaluations and regular maintenance observations	10/97 C		
			*	Review core IPs and propose PRA guidance where needed	10/97 C		
			*	Complete revision to proposed core IPs except for IP 71007 and 82701.	6/98 C		
			*	Issue final GQA IP	deferred		Changed (Note 1.3a)
		Provide PRA training for inspectors and senior reactor analysts (SRAs).	*	Develop, Test & Implement programs for incorporating risk principles into inspection program that are linked with risk-informed improvements in Licensee Performance Assessment and Enforcement	12/99		Changed (Note 1.3b)
			*	Review IPEEE insights report and extract guidance for inspectors	12/00	NRR	New (Note 1.3c)
			*	Identify inspector functions that should utilize PRA methods, as input to AEOD/TTD for their development and refinement of PRA training for inspectors	7/96 C	NRR	(133)
			*	Develop consolidated and comprehensive 2—3 week PRA for regulatory applications training course	40/07.0	NDD/AFOD	
			*	Conduct training for Maintenance Rule baseline inspections	10/97 C	NRR/AEOD	
			*	Conduct training courses according to SRA training programs	8/96 C	NRR	
			*	Develop rotational assignments for SRAs to gain working PRA experience	Ongoing	AEOD	
					Ongoing	NRR/RES	

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
		Continue to provide expertise in risk assessment to support regional inspection activities and to communicate inspection program guidance and examples of its implementation.	Monitor the use of risk in inspection reports      Develop new methodologies and communicate appropriate uses of risk insights to regional offices	Ongoing Ongoing	NRR	
			* Update inspection procedures as needed	Ongoing		
			Assist regional offices as needed	Ongoing		
			* Conduct Maintenance Rule baseline inspections	7/98C		
1.4	OPERATOR LICENSING	Monitor insights from human reliability analyses (HRAs) of PRAs (including IPEs and individual plant examinations, external events (IPEEEs)) and operating experience to identify	* Revise the Knowledge and Abilities Catalogs (NUREGs- 1122 and 1123) to incorporate operating experience and risk insights	8/95 C	NRR	
		possible enhancements for inclusion in planned revisions to guidance for operator licensing activities (initial and requalification).	* Revise the Examiner Standards (NUREG-1021), as needed to reflect PRA insights	3/97 C		
1.5	EVENT ASSESSMENT	Continue to conduct quantitative event assessments of reactor events while at power and during low- power and shutdown conditions.	* Continue to evaluate 50.72 events using accident sequence precursor (ASP) models	Ongoing	NRR	
		Assess the desirability and feasibility of conducting quantitative risk assessments on non-power reactor events.	Define the current use of risk analysis methods and insights in current event assessments	TBD		
			* Assess the feasibility of developing appropriate risk-assessment models			
			* Develop recommendations on the feasibility and desirability of conducting quantitative risk assessments			
1.6	USE OF PRA IN RESOLUTION OF GENERIC SAFETY ISSUES	Audit the adequacy of licensee analyses in IPEs and IPEEs to identify plant-specific applicability of generic safety issues closed out based on IPE and IPEEE programs.			NRR/RES	Now tracked as part of tem 1.10
1.7	REGULATORY EFFECTIVENESS EVALUATION	Assess the effectiveness of major safety issue resolution efforts for reducing risk to public health and safety.			RES/NRR	It is tracked now as item 2.11

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
1.8	ADVANCED REACTOR REVIEWS	Continue staff reviews of PRAs for design-certification applications.	* Continue to apply current staff review process	9/98	NRR	Completed (Note 1.8a)
		Develop SRP to support review of PRAs for design certification reviews of evolutionary reactors	* Develop draft SRP for technical staff review and concurrence	Dropped	NRR	Changed (Note 1.8b)
		(ABWR and System 80+).	* Finalize SRP	Dropped		Changed (Note
		Develop independent technical analyses and criteria for evaluating industry initiatives and petitions regarding simplification of emergency preparedness (EP) regulations.	* Reevaluate risk-based aspects of the technical bases for EP (NUREG-0396) using insights from NUREG-1150, the new source term information from NUREG-1465, and available plant design and PRA information for the passive and evolutionary reactor designs	12/96 C	NRR/RES	1.8b)
		Modify 10 CFR Part 52 and	* Develop draft guidance and rule			
		develop guidance on the use of updated PRAs beyond design certification (as described in	•	Dropped	NRR	Changed (Note 1.8
		SECY 93-087).	* Finalize staff guidance and rule	Dropped		
				Dropped		Changed (Note 1.8)
1.9	ACCIDENT MANAGEMENT	Develop generic and plant- specific risk insights to support staff audits of utility accident management (A/M) programs at selected plants.	* Develop plant-specific A/M insights/information for selected plants to serve as a basis for assessing completeness of utility A/M program elements (e.g., severe-accident training)	TBD	NRR/RES	Changed (Note 1.9)

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
1.10	IPE FOLLOW-UP ACTIVITIES	Evaluate specific improvements and analyses proposed as basis for resolution of generic safety	* Evaluate analyses of issues requested in Generic Letter 88-20	5/99	RES	
		issues at specific plants.	* Evaluate other issues (e.g., SGTR induced severe accident)	deferred	NRR	Changed (Note 1.10)
			<ul> <li>Evaluate unsolicited analyses of selected voluntary generic issues (GSI23) submitted by licensees.</li> </ul>	12/99	NRR	Changed (Note 1.10)
		Use results from the staff review of IPEs to identify potential safety issues and determine an appropriate course of action to address these potential issues.	* Recommendations to Commission regarding Follow up on accident management programs and licensee-stated	deferred	NRR/ regions	Changed (Note 1.9)
			actions.		NRR/RES	
			<ul> <li>Assess reduction in risk associated with facility modifications.</li> </ul>	deferred		Changed (Note 1.10)
					NRR/RES	
			<ul> <li>Identify plant improvements implemented by licensees</li> </ul>	deferred		Changed (Note 1.10)
			* Determine in accordance with the backfit rule if additional plant-specific or generic plant improvements that would further reduce the risk of severe accidents are warranted.	deferred	NRR/ regions	Changed (Note 1.10)
			<ul> <li>Define use for information, clarify "regulatory use," and assess the most effective methods for data collection</li> </ul>	5/98 C	NRR	
		Determine appropriate approach for tracking the regulatory uses of IPE/IPEEE results.	<ul> <li>If appropriate, develop approach for linking IPE/IPEEE databases</li> </ul>	deferred	NRR/RES	Changed (Note 1.10)

#### Section 1 Notes

- 9. The proposed versions of the draft RG and SRP for ISI were issued for use in September 1998. The final versions will be completed by December 1999 after the staff completes its safety evaluation of the EPRI methodology in September 1999.
- 1.2a The staff issued the safety evaluation report (SER) on the Comanche Peak risk-informed inservice testing program on August 14, 1998. This is a change from the previous date of July 1998. The SER was issued two weeks after the target schedule to allow for incorporation of additional details.
- 1.2b The three RI-ISI pilot applications have been completed on schedule since the last PRA Implementation Plan report. The staff granted the licensee's request that ANO-1 be a pilot for the application of the EPRI method for class 1, PWR piping. The date was changed from December 1998 to July 1999 to correspond to the scheduled completion of the (new) fourth pilot (i.e., ANO-1).
- 1.3a The staff is presently considering comments from the CRGR and is developing a revised approach to provide GQA inspection guidance.
- 1.3b Previous activities supporting development of risk-informed inspection program guidance reported in the last PRA Implementation Plan update have been superceded by the most recent initiative which began in the fall of 1998. This initiative will result in a re-definition of the inspection program. The previously

identified task to evaluate methods for presenting risk analysis results in a form most useful to inspectors is subsumed by this current initiative. Detailed implementation plans and schedules for this initiative were separately reported to the Commission as a Transition Plan in SECY-99-007.

- 1.3c This task will be completed six months after completion of the final IPEEE insights report which is due in July 2000.
- In the SRM for SECY-94-182, the Commission instructed the staff to develop a rule that would require COL applicants and holders to maintain, update, and use a PRA for the life of the facility. In the last few Rulemaking Activity Plan updates sent to the Commission, the staff stated this rulemaking activity is on hold. Since the staff does not now see any significant interest by a U.S. utility in requesting a COL for an evolutionary LWR design, we are giving this task a low priority. The priority for this task will be revised if a COL becomes likely. This activity will be tracked in the Rulemaking Activity Plan and will be dropped from the PRA Implementation Plan.
- 1.8a FSER of final ALWR review issued 9/98 (NUREG-1512)
- 1.8b No additional design certification submittals are presently anticipated. The need for an SRP will be reassessed if such submittals become likely.
- 1.9 The staff is reconsidering the necessity of audits and exploring ways to achieve the goals and objectives of the audits within the context of the evolving risk-informed inspection program.
- 1.10 Work on IPE follow-up activities has been deferred pending receipt of the Commission's staff requirements memorandum regarding SECY-98-300, which proposes options for risk-Informed revisions to 10 CFR Part 50. If the Commission accepts the staff's recommended course of action and directs the staff to proceed with rulemaking, the staff believes many of the goals and objectives of IPE follow-up activities could be achieved within the context of the regulations after they have been made more risk-informed. The staff is currently developing a more limited IPE follow-up program that would be complementary with the Part 50 risk-informed approach that is currently under Commission consideration.

# 2.0 REACTOR SAFETY RESEARCH

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
2.1	REGULATORY GUIDES	Develop RGs to provide a basis for the industry to use in risk-informed regulation.	* Transmit draft PRA RGs to the Commission for approval to issue for public comment: General IST ISI GQA TS	00000	RES/NRR	
			* Transmit final PRA RGs to the Commission for approval:	1/98 C 3/98 C 12/99 3/98 C 3/98 C		Note 1.1
			Update and revise PRA RGs: General IST GQA TS ISI	6/99 8/99 8/99 8/99 12/00		New
2.2	TECHNICAL SUPPORT	Provide technical support to NRC staff using risk assessment in risk-based regulation activities and technical reviews; issue risk assessments and statistical analyses; and develop guidance for agency uses of risk assessment.	* Continue to provide ad hoc technical support to agency PRA users  * Expand the use of PRA models available; expand the scope of available models to include external, low-power, and shutdown events; refine the tools needed to use these models; and continue maintenance and user support for SAPHIRE and MACCS computer codes  * Support agency efforts in reactor safety improvements in former Soviet Union countries  * Load plant-specific PRAs in SAPHIRE to support various risk-informed	Continuing Continuing Continuing Ongoing	RES	(Note 2.2)
			regulatory activities, e.g., pilot applications, resolution of generic issues, and Maintenance Rule inspections.			
2.3	SUPPORT FOR NRR STANDARD REACTOR PRA REVIEW					Subsumed by Section 1.8, "Advanced Reactor Reviews"

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)															
2.4	DEVELOPMENT AND maintain, and ensure the quality of methods for performing.	demonstration of methods for incorporating aging effects into PRAs.		RES	Changed (Note 2.4a)																
PRAs and related techniques for existing	techniques for existing	PRAs and related techniques for existing	PRAs and related techniques for existing	PRAs and related f	* Develop and demonstrate methods for incorporating human errors of commission in PRAs.	9/98 C															
	reactor designs.	* Conduct application of ATHENA for fire risk assessment	7/99		New (note 2.4b)																
*	<ul> <li>Develop improved methods and data for assessing likelihood of fire-induced circuit failures</li> </ul>	9/99																			
			<ul> <li>Identify and prioritize key areas to improve fire risk analysis</li> </ul>	9/98		Completed															
			* Develop and demonstrate methods for assessing reliability/risk of digital systems	9/00		(Note 2.4c)															
0.5	IDE AND IDEEE	Funda IDE/IDEEE	* O		RES																
2.5	IPE AND IPEEE REVIEWS	Evaluate IPE/IPEEE submittals to obtain reasonable assurance that the licensees have adequately analyzed	Complete the reviews of the three outstanding IPE submittals:     Susquehanna     Crystal River     SER for Browns Ferry 3	6/98 C 6/98 C 6/98 C	RES	(Note 2.5a)															
		plant design and operations to discover	* Revised SER for Browns Ferry3	3/99																	
		document significant	document significant	document significant	document significant	vulnerabilities; and document significant	document significant		document significant	ocument significant   * Continue regional IPE presentations.   12/97 C	12/97 C										
		from IPE/IPEEEs.	<ul> <li>* Issue IPE insights report for public comment.</li> </ul>	10/96 C																	
			* Issue final IPE insights report	12/97 C																	
			<ul> <li>Issue preliminary IPEEE insights report</li> </ul>	1/98 C																	
			Initiate review of eight additional IPEEE submittals	6/98 C																	
				6/98 C																	
			* Complete reviews of IPEEE submittals.	4/00		Changed (Note 2.5b)															
			* Issue draft IPEEE insights report for comment	7/00		Changed (note 2.5b)															
			* Issue final IPEEE insights report	1/01		Changed (Note 2.5b)															

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
2.6	GENERIC SAFETY ISSUES PROGRAM	Conduct generic safety issue management activities, including prioritization, resolution, and documentation, for issues relating to currently operating reactors, for advanced reactors as appropriate, and for development or revision of associated regulatory and standards instruments.	* Continue to prioritize and resolve generic safety issues	Continuing	RES	
2.7	NEI INITIATIVE TO CONDUCT "WHOLE PLANT" RISK STUDY	Review NEI initiative to conduct three pilot 'whole plant" risk-informed studies of requirements vs. risk and cost.	* Agree on ground rules for study     * Complete study	TBD TBD	RES/NRR	Note 2.7
2.8	PRA STANDARDS DEVELOPMENT	Work with industry to develop national consensus standard for PRA scope and quality.	<ul> <li>* Initiate Phase 1 activity</li> <li>* Issue initial ASME draft standard</li> <li>* Issue draft standard for select public comment</li> <li>* Finalize Phase 1 standard</li> <li>* Initiate Phase 2 effort</li> </ul>	9/97 C 7/98 C 1/99 C 12/99 TBD	RES	Note 2.8
2.9	LOW POWER AND SHUTDOWN BENCHMARK RISK STUDY	Collect studies of LP&S risk as a benchmark for assessing the need for further staff activities.	* Collect and review existing LP&S risk information (domestic and foreign)     * Initiate additional work	6/99 6/99	RES	Changed Note 2.9
2.10	SAFETY GOAL REVISION	Assess need to revise Commission's Safety Goal to make core damage frequency a fundamental goal and make other changes.	* Initiate discussion with ACRS  * Make recommendation to Commission  * Provide information paper  * Provide final recommendations	2/98 C 4/98 C 4/99 7/99	RES	Note 2.10
2.1		Assess the effectiveness of major safety issue resolution efforts for reducing risk to public health and safety.	<ul> <li>Develop process/guidance for assessing regulatory effectiveness</li> <li>Apply method to assess reduction in risk</li> <li>Evaluate resulting effectiveness of station blackout and ATWS rules and Unresolved Safety Issue A-45</li> <li>Propose modifications to resolution approaches, as needed</li> <li>Identify other issues for assessment if appropriate</li> </ul>	TBD TBD	RES/NRR	

Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
PROGRAMS AND PROCESSES	Perform a broad review of the agency's process to search for opportunities to make these activities more risk informed	Identify options for modifying Part 50 to be risk-informed (SECY 98-300)      Provide recommendations on Part 50 risk-modifications      Identify options for incorporating risk insights into the 10 CFR 50.59 process      PRA Steering Committee	12/98	AEOD	Completed  Note 2.9  Completed

#### Section 2 Notes

- 2.2 The Office of Nuclear Regulatory Research has an ongoing effort of developing plant-specific input decks (i.e., loading into SAPHIRE plant-specific PRAs) which are used to explore "what if" questions and to assess issues of a plant-specific or generic nature. For example, SAPHIRE models were used in the development of guidance for risk-informed IST, ISI, GQA, and TS, the ranking and resolution of generic issues, and in Maintenance Rule inspections.
- 2.4(a) Draft report issued for comment November 1998
- 2.4b Key areas identified in SECY-98-230, prioritization discussed with ACRS Fire Protection Subcommittee January 22, 1999
- 2.4c Methods developed in this area has been deferred until FY2000 because of budget constraints in FY1999
- 2.5(a) Staff review of Browns Ferry 3 IPE submittal indicated it did not meet the intent of GL-88-20; licensee responses to RAIs provided additional information and RES is preparing a revised SER.
- 2.5(b)The target schedule for completing the reviews of all IPEEE submittals has been changed from December 1999 to April 2000. Correspondingly, changes were made to the target schedules for issuing the draft and final IPEEE insights reports. A number of factors contributed to revising the IPEEE review schedule. Among these were that (1) there was a delay in receiving responses from industry on generic fire requests for additional information (RAIs), (2) many licensees requested additional time to respond to plant specific RAIs and (3) staff resources were needed to complete other high priority NRC work.
- 2.7 The staff has subsumed its interactions with the NEI on the "whole plant study" into the recommended approach to risk-inform 10CFR 50 as discussed in SECY-98-300.
- 2.8 Draft standard provided for comment: to select public in November 1998 and to general public in January 1999; ASME anticipates publication of final standard 12/99 at the latest. The standard will set forth the criteria and methods for developing and applying PRA methodology to commercial nuclear power plants and applies to PRAs used to support design, procurement, construction operation and maintenance. The standard is limited to a Level 1 analysis (i.e., core damage frequency) and a Level 2 analysis sufficient to evaluate the LERF for internal events at full power, excluding internal fires. The standard defines requirements in five areas: (1) Technical requirements for developing a PRA that estimates a realistic CDF and LERF, (2) documentation requirements for providing traceability of the analysis, (3) configuration control requirements for updating and maintaining the PRA so that it represents the as-built and as-operated plant, (4) peer review requirements for verifying that the above requirements were properly interpreted and implemented and (5) application process requirements for determining if the technical requirements are necessary and sufficient for the application. ASME has not initiated Phase 2 activity (internal fires, external events and low power and shutdown operations).

- 2.9 Work delayed due to higher priority work as described in the staff's response to the Chairman's Tasking Memorandum (CTM).
- 2.10 Work delayed due to higher priority work described in the CTM and the RES Self-Assessment Program.

# 3.0 ANALYSIS AND EVALUATION OF OPERATING EXPERIENCE, AND TRAINING

Regulatory Activity Objectives Methods Target Lead Status Schedule Office quart	Regulatory Activity
3.1 RISK-BASED TRENDS AND PATTERNS ANALYSIS  Use reactor operating experience data to assess the trends and patterns in equipment, systems, initiating events, human performance, and important accident sequence.  * Trend performance of risk-important components  * Trend performance of risk-important systems  * Trend performance of risk-important systems  * Trend performance of risk-important initiating events  * Trend frequency of risk-important initiating events  * Trend human performance for reliability characteristics  * Trend neactor operating experience associated with specific safety issues and assess risk implications as a measure of safety performance  Develop trending methods and special databases for use in AEOD trending activities and for PRA applications in other NRC offices.  * Develop standard trending and statistical analysis procedures for identified areas for reliability and statistical applications  * Develop special software and databases (e.g., commoncause failure) for use in trending analyses and PRA  * Develop special software and databases (e.g., commoncause failure) for use in trending analyses and PRA	AND PATTERNS ANALYSIS

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office	Status (this quarter)
3.2	ACCIDENT SEQUENCE PRECURSOR (ASP) PROGRAM	Identify and rank risk significance of operational events.	* Screen and analyze LERs, AITs, IITs, and events identified from other sources to obtain ASP events	Ongoing	AEOD	
			* Perform licensee and NRC staff peer review of each ASP analyses	Annual report, Ongoing	AEOD	Note3.2
			<ul> <li>Complete quality assurance of Revision 2 of the simplified plant-specific models</li> </ul>		RES	
			<ul> <li>Complete feasibility study for low-power and shutdown models</li> </ul>	С	RES	
			<ul> <li>Complete initial containment performance and consequence models.</li> </ul>	С	RES	
			* Complete initial development of the LERF models  * Complete Revision 3 of the	5/99	RES	
			Level 1 simplified plant- specific models  * Complete LERF prototype	6/01	RES	
			* Complete external event models for fire and	9/00	AEOD	New
			earthquake	TDD	DEO	
			* Complete low-power and shut down models	IBD	RES	
				TBD	RES	
		Provide supplemental information on plant-specific performance.	* Share ASP analyses and insights with other NRC offices and regions	Annual report	AEOD	
3.3	INDUSTRY RISK TRENDS	Provide a measure of industry risk that is as complete as possible to determine whether risk is increasing, decreasing, or remaining constant over time.	* Develop program plan to integrate NRR, RES, and AEOD activities using design and operating experience to assess the implied level of risk and how it is changing	С	AEOD	
			* Implement program plan elements to include plant-specific models and insights from IPEs, component and system reliability data, and other risk-important design and operational data in an integrated framework to periodically evaluate industry trends	1/01		

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office	Status (this quarter)
3.4	INDICATORS	Establish a comprehensive set of performance indicators and supplementary performance measures which are more closely related to risk and provide both early indication and confirmation of plant performance problems.	Identify new or improved risk-based Pls which use component and system reliability models and human and organizational performance evaluation methods     Develop test and issue for public comment candidate Pls/performance measures     Implement risk-based Pls with Commission approval	9/00 1/01	AEOD	

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office	Status (this quarter)
3.5	OPERATING EXPERIENCE DATA	Compile operating experience information in database systems suitable for quantitative reliability and risk analysis applications. Information should be scrutable to the source at the event level to the extent practical and be sufficient for estimating reliability and availability parameters for NRC applications.	* Manage and maintain SCSS and the PI data base, provide oversight and access to NPRDS/EPIX, obtain INPO's SSPI, compile IPE failure data, collect plant-specific reliability and availability data  * Develop, manage, and maintain agency databases for reliability/availability data (equipment performance,	Ongoing Ongoing	AEOD	
			initiating events, CCF, ASP, and human performance data)			
			* Determine need to revise LER rule to eliminate unnecessary and less safety- significant reporting	6/98 C		
			* Determine need to revise reporting rules and to better capture ASP, CCF, and human performance events	6/98 C		
			* Publish revised LER rule			
			* Develop database to collect reliability and availability data (RADS)	2/00		Changed (note 3.5)
				4/00		New
3.6	STAFF TRAINING	Present PRA curriculum as presently scheduled for FY 1998.	* Continue current contracts to present courses as scheduled	0 0	AEOD	
			* Maintain current reactor technology courses that include PRA insights and applications	Ongoing Ongoing		
			* Improve courses via feedback  * Review current PRA course	C		
			material to ensure consistency with Appendix C			

Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office	Status (this quarter)
	Develop and present Appendix C training courses.	* Prepare course material based on Appendix C	С	RES/AEOD	
		* Present courses on Appendix C	С		
	Determine staff requirements for training, including	<ul> <li>Review JTAs performed to date</li> </ul>	С	AEOD	
	analysis of knowledge and skills, needed by the NRC staff. *	* Perform representative JTAs for staff positions (JTA Pilot Program)	С		
		* Evaluate staff training requirements as identified in the PRA Implementation Plan and the Technical Training Needs Survey (Phase 2) and incorporate them into the training requirements analysis	С		
		<ul> <li>* Analyze the results of the JTA Pilot Program and determine requirements for additional JTAs</li> </ul>	С		
		<ul> <li>Complete JTAs for other staff positions as needed</li> </ul>	С		
		<ul> <li>Solicit a review of the proposed training requirements</li> </ul>	С		
	Device current DDA curriculum	* Finalize the requirements	С		
	Revise current PRA curriculum and develop new training program to fulfill identified staff	<ul> <li>Prepare new courses to meet identified needs</li> </ul>	Ongoing	AEOD	
	needs.	* Revise current PRA courses to meet identified needs	Ongoing		
		<ul> <li>Revise current and new PRA course to include RG and SRP information</li> </ul>	9/97 C		
		* Revise current reactor technology courses as necessary to include additional PRA insights and applications	Ongoing		
	Present revised PRA training curriculum.	<ul> <li>Establish contracts for presentation of new PRA curriculum</li> </ul>	Ongoing	AEOD	
		<ul> <li>Present revised reactor technology courses</li> </ul>	Ongoing		
		* Improve courses based on feedback	Ongoing		

#### Section 3 Notes

- 3.1 Date changed due to budget priorities and staffing restrictions
- 3.2 Funding and staffing currently planned for FY 00 and beyond will not support the continuation of the annual ASP program analysis as done currently. This will result either in a delay in completion of event analyses, a limitation in the number of analyses that can be done, or both.

3.5	Date changed to accommodate in the process of drafting the rule	ndustry's request s and guidelines	for an additional	public meeting (tal	ble-top exercise) early	/
			18			

# 4.0 NUCLEAR MATERIALS AND LOW-LEVEL WASTE SAFETY AND SAFEGUARDS REGULATION

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
4.1	VALIDATE RISK ANALYSIS METHODOLOGY DEVELOPED TO ASSESS MOST LIKELY FAILURE MODES AND HUMAN PERFORMANCE IN THE USE OF INDUSTRIAL AND MEDICAL RADIATION DEVICES	Validate risk analysis methodology developed to assess the relative profile of most likely contributors to misadministration for the gamma stereotactic device (gamma knife).	* Hold a workshop consisting of experts in PRA and HRA to examine existing work and to make recommendations for further methodological development  * Examine the use of Monte Carlo simulation and its application to relative risk profiling  * Examine the use of expert judgement in developing error rates and consequence measures	8/94 C 9/95 C 9/95 C	NMSS	
		Continue the development of the relative risk methodology, with the addition of event tree modeling of the brachytherapy remote after loader.	* Develop functionally based generic event trees	TBD	RES/ NMSS	
		Extend the application of the methodology and its further development into additional devices, including teletherapy and the pulsed high dose rate after loader.	* Develop generic risk approaches	TBD	RES/ NMSS	
4.2	CONTINUE USE OF RISK ASSESSMENT OF ALLOWABLE RADIATION RELEASES AND DOSES ASSOCIATED WITH LOW-LEVEL RADIOACTIVE WASTE AND RESIDUAL ACTIVITY.	Develop decision criteria to support regulatory decision- making that incorporates both deterministic and risk-based engineering judgment.	* Conduct enhanced participatory rulemaking to establish radiological criteria for decommissioning nuclear sites; technical support for rulemaking, including comprehensive risk-based assessment of residual contamination  * Develop guidance for implementing the radiological criteria for license termination  * Work with DOE and EPA to	8/94 C Final rule published 7/97 C	RES/NMSS	
			the extent practicable to develop common approaches, assumptions, and models for evaluating risks and alternative remediation methodologies (risk harmonization)	Ongoing		
4.3	DEVELOP GUIDANCE FOR THE REVIEW OF RISK ASSOCIATED WITH WASTE REPOSITORIES.	Develop a branch technical position on conducting a performance assessment of an LLW disposal facility.	Solicit public comments     Publish final Branch     Technical Position	5/97 C TBD, dependent on resources	NMSS/RES	

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
4.4	ASSESS RISK ASSESSMENT OF MATERIAL USES.	Develop and demonstrate a risk assessment for industrial gauges containing cesium-137 and cobalt-60 using PRA and other related techniques.	* Develop and demonstrate methods for determining the risk associated with industrial gauges containing cesium-137 and cobalt-60	9/98	RES	Completed
		The assessment should allow for modification based on changes in regulatory requirements.	* Issue final report as a NUREG	4/99		Changed (Note 4.4a)
		Use empirical data as much as practicable.				
		Develop and demonstrate risk assessment methods for application to medical and industrial licensee activities.	* Through working group with contractor assistance, identify and document a technical basis for a risk-informed approach to the regulation of nuclear byproduct material, and develop plans for a graded approach to nuclear byproduct material regulation based on risk information	2/99	NMSS	Changed (Note 4.4b)
4.5	USE OF PRA IN REGULATING NUCLEAR MATERIALS	Develop a framework for applying PRA to nuclear material uses, similar to the one developed for reactor regulation (SECY-95-280), where appropriate.	Provide plan for developing framework     Complete scoping effort     Complete framework	6/98 C 3/99 TBD	NMSS	Changed (Note 4.5)

## Section 4 Notes

- 4.4(a) NMSS completed review of the draft NUREG in January 1999; Final scheduled for publication in April 1999
- 4.4(b) Schedule for SECY paper extended to allow for coordination with SECY being prepared as part of Regulatory Activity 4.5.
- 4.5 Schedule for this SECY extended because of unanticipated technical difficulties and a short term need to divert resources to higher priority efforts

# 5.0 HIGH-LEVEL NUCLEAR WASTE REGULATION

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
5.1	REGULATION OF HIGH- LEVEL WASTE	Develop guidance for the NRC and CNWRA staffs in the use of performance assessment (PA) to evaluate the safety of HLW programs.	* Assist the staff in pre- licensing activities and in license application reviews  * Develop a technical assessment capability in total- system and subsystem PA for use in licensing and pre-licensing reviews  * Combine specialized technical disciplines (earth sciences and engineering) with those of system modelers to improve methodology	Ongoing	NMSS	
		Identify significant events, processes, and parameters affecting total system performance.	* Perform sensitivity studies of key technical issues using iterative PA (IPA)	Ongoing	NMSS	
		Use PA and PSA methods, results, and insights to evaluate proposed changes to regulations governing the potential repository at Yucca Mountain.	* Assist the staff in maintaining and refining the regulatory structure in HLW disposal regulations that pertain to PA * Apply IPA analyses to advise EPA in its development of a Yucca Mountain regulation * Apply IPA analyses to develop a site-specific regulation for a Yucca Mountain site	Ongoing	NMSS	Note 5.1(a)
		Continue PA activities during interactions with DOE during the pre-licensing phase of repository development, site characterization, and repository design.	* Provide guidance to the DOE on site characterization requirements, ongoing design work, and licensing issues important to the DOE's development of a complete and high-quality license application  * Compare results of NRC's iterative performance assessment to DOE's Viability Assessment (VA) to identify major differences/issues	Ongoing	NMSS	Note 5.1(b)
5.2	PRA APPLICATION TO SPENT FUEL STORAGE FACILITIES	Demonstrate methods for PRA of spent fuel storage facilities.	Prepare user needs letter to RES     Conduct ISA of dry-cask storage system	4/97 C 6/99	RES/NMSS	Note 5.2

Regulatory	Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
ASSESSMEN SUPPORT O	NT IN F /E MATERIAL	Use PRA methods, results, and insights to evaluate regulations governing the transportation of radioactive material.	* Update the database on transportation of radioactive materials for future applications     * Revalidate the results of NUREG-0170 for spent fuel shipment risk estimates	6/01	NMSS	

## Section 5 Notes

- 5.1(a) SECY-98-225 forwarded a draft proposed 10CFR63 for Commission approval in 9/98
- 5.1(b) DOE provided the viability assessment for NRC review in 12/98; staff will report its findings to the Commission in a 3/99 SECY.
- Because of resource constraints, the staff has completed an ISA for a particular dry cask storage system in lieu of the broader project that was originally planned. The report is undergoing peer review and will be published in 6/99.

# 6.0 REACTOR ENFORCEMENT

	Regulatory Activity	Objectives	Methods	Target Schedule	Lead Office(s)	Status (this quarter)
6.1	CONSIDERATION OF RISK IN THE ENFORCEMENT PROCESS	Ensure the consistent Application of the Enforcement Policy in the Area of Risk Informed Enforcement Actions.	guidance memorandum (EGM)	6/ 97 C 8/98 C	OE OE	
6.2	RISK INSIGHTS DURING WEEKLY ENFORCEMENT PANELS	Ensure risk-informed decisions are made in developing enforcement actions.	* Include regional senior reactor analyst evaluation on paneled enforcement cases when warranted	Ongoing	OE	
6.3	CHANGE THE ENFORCEMENT POLICY SUPPLEMENTS TO INCLUDE ADDITIONAL EXAMPLES OF HOW RISK SHOULD INFLUENCE SEVERITY LEVEL	Provide the staff with more useful guidance for determining the Severity Level of Violations.	* Interface with NRR (SPSB) to consider additional examples for the policy supplements	Spring 99	OE	

#### **ABBREVIATIONS**

ABWR advanced boiling-water reactor

AEOD Office for Analysis and Evaluation of Operational Data

ACRS Advisory Committee on Reactor Safeguards

AFW auxiliary feedwater

AIT augmented inspection team
ANO Arkansas Nuclear One
AOT allowed outage time
A/M accident management
APS Arizona Public Service

ASME American Society of Mechanical Engineers

ASP accident sequence precursor
ATWS anticipated transient without scram

BF3 Browns Ferry Unit 3

C completed

COL combined construction and operating license

CCF common-cause failures
CFR Code of Federal Regulations

CRGR Committee to Review Generic Requirements

CY calendar year

CNWRA Center for Nuclear Waste Regulatory Activities

DOE Department of Energy EDG emergency diesel generator

EGM Enforcement Guidance Memorandum

EP emergency preparedness

EPA Environmental Protection Agency

EPIX Equipment Performance and Information Exchange

FY fiscal year HLW high-level waste

HRA human reliability analysis
GSI generic safety issue
GQA graded quality assurance

JTA job task analysis IE initiating event

IMC inspection manual chapter

INPO Institute of Nuclear Power Operations

IP inspection procedure

IPA iterative performance assessment IPE individual plant examination

IPEEE individual plant examination, external events

IIT incident inspection team

IST inservice testing
ISI inservice inspection
LAN local area network
LER licensee event report

LOSP loss of offsite power LLW low-level waste

LP&S low power and shutdown

MACCS MELCOR Accident Consequence Code System

MR Maintenance Rule
NEI Nuclear Energy Institute

NOED notice of enforcement discretion
NPRDS nuclear plant reliability data system
NRR Office of Nuclear Reactor Regulation

NMSS Office of Nuclear Material Safety and Safeguards

OCIO Office of the Chief Information Officer

OE Office of Enforcement

OGC Office of the General Counsel
PA performance assessment
PI performance indicator
PIP PRA Implementation Plan

PIPB Inspection Program Branch, NRR

PM project manager

PRA probabilistic risk assessment RAI request for additional information

RCP reactor coolant pump

RES Office of Nuclear Regulatory Research

RG regulatory guide

SAMG severe-accident management guidance

SAPHIRE Systems Analysis Programs for Hands -on Integrated Reliability Evaluations

SBO station blackout

SECY Office of Secretary of the Commission

SER safety evaluation report

SGTR steam generator tuber rupture

SONGS San Onofre Nuclear Generating Station SPSB Probabilistic Safety Assessment Branch SCSS sequence coding and search system

SRP standard review plan SRA senior reactor analysts

SRM staff requirements memorandum
SSPI Safety System Performance Indicator

TBD to be determined

TTD Technical Training Division TS technical specifications

TU Texas Utilities Fy Fiscal Year

VA viability assessment