



**RIC 2011  
Status and Path Forward  
Related to  
Generic Safety Issue 191**

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Safety Issues Res. Branch/NRR  
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**Status of GSI-191**

- All PWRs have taken actions to improve strainer performance
  - Installed larger strainers
  - Removed insulation
  - Changed pH buffers
  - Modifications for ex-vessel downstream effects
  - Compensatory measures
- Many plants plan further modifications

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**Status of GSI-191 (continued)**

- Still difficult to demonstrate compliance with large amounts of problematic material
  - ~2/3 of PWRs are nearly complete (except in-vessel)
  - Some of these are “test to success”
- Testing continues
  - In-vessel effects
    - Needed to close GSI-191
    - May be limiting factor in terms of debris
  - Zone of influence
    - Refinement to models
- BWR Owners Group is addressing lessons learned

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### SECY-10-0113

- Commission directed staff to develop closure options
- Staff provided 3 options to close GSI-191
  - (1) Maintain current approach
    - (a) Firm schedule for full spectrum of LOCAs
    - (b) Near-term schedule for smaller LOCAs, Longer-term schedule for larger LOCAs
    - (c) No firm schedule
  - (2) Risk-inform
    - (a) Expand Section 6 of SE for NEI-04-07
    - (b) New guidance based on proposed 10 CFR 50.46a
  - (3) Credit leak before break
- Staff recommended combination of Options 1(b) and 2

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### SRM-SECY-10-0113

- SRM issued December 23, 2010
- Commission approved staff recommendations
  - Options 1(b) and 2, with clarifications
- Commission understands that industry expects to:
  - Conclude testing in 2011
  - Develop path forward in mid-2012
- Prudent to complete testing before further modifications
- Commission directed staff to evaluate alternatives for closing GSI-191 (next slide)

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### SRM-SECY-10-0113 (continued) Alternatives for Closing GSI-191

- Assess technical and policy implications
  - Includes risk-informed approach to GSI-191
- Consider how to treat debris fouling as beyond-design-basis
  - 50.46a
  - No transition break size approach
- Have we missed practical ways to address GSI-191?
- How do in-vessel effects limit alternatives?
- What phenomenological justification is needed?

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### Path Forward

- Staff is developing plan for closure of GSI-191
  - Includes completion of ongoing testing
  - Includes assessment of alternative approaches
- Staff is keeping Commission informed of progress on a regular basis
- Staff will develop report for Commission
  - Scheduled for June 2012

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### Path Forward (continued)

- Staff is seeking stakeholder input on alternative methods for resolving GSI-191
  - E-mail by 5/31/11 to [Stewart.Bailey@nrc.gov](mailto:Stewart.Bailey@nrc.gov)
  - Roundtable meeting planned for summer 2011

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