

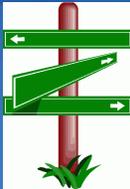
**GSI-191
Path Forward and Beyond**

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Welcome to the Crossroads

- GSI-191 has been a long and difficult journey
- Commission SRM to SECY 10-0113 has now opened up new pathways for GSI-191 resolution



- Industry and NRC efforts must now focus on clearly defining these pathways
- Necessary to achieve closure
- Necessary to ensure closure going forward



Commission SRM Pathways

- SECY 10-0113 provided three resolution options for Commission consideration
 - Option 1 – Deterministic pathway
 - Option 2 – Risk-informed pathway
 - Option 3 – Application of GDC-4 exclusion
- Commission guidance to SECY 10-0113 was issued on December 23rd



Commission SRM Pathways

- **Deterministic Pathway (Option 1)**
 - Plants can continue efforts to resolve GSI-191 via the deterministic path
 - Allows risk-informed implementation schedule
 - Pros:
 - Relatively well defined path
 - Shortest path to resolution
 - Cons:
 - Very narrow path
 - Potentially costly tolls
 - Will be difficult to stay within the lines






Commission SRM Pathways

- **Risk-Informed Path (Option 2)**
 - Encourages staff to fully explore alternatives for risk informing the path forward
 - According to the SRM, operative words are “innovation and creativity”
 - Pros:
 - Provides an opportunity to guide GSI-191 actions in a way that provide safety benefit
 - Cons:
 - Uncertainties will remain until specific application guidance is developed






Commission SRM Pathways

- **GDC-4 Pathway (Option 3)**
 - Application of GDC-4 would have allowed exclusion of debris generation for breaks postulated in LBB qualified piping
 - Not allowed by Commission SRM






Industry Priorities

- Complete testing planned for 2011
 - Necessary for resolution irrespective of path chosen
- Develop options and guidance for risk-informed resolution pathways
 - Multiple paths are necessary
- Develop guidance for plant use in addressing operability considerations



Questions?