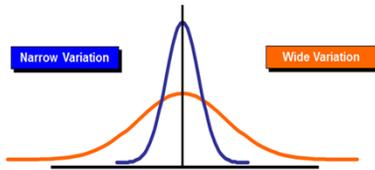


SDP Streamlining – Why?

- NRC using too many resources and taking too much time to produce an assessment outcome that relies on quantitative analyses typically involving large degrees of uncertainty
- Commission direction
 - *“the staff should work to streamline the Significance Determination Process and establish appropriate timeliness metrics for finalizing inspection findings”*
 - *“if the staff deems that the collection of changes is significant enough to merit review by the Commission, the staff should seek such review”*

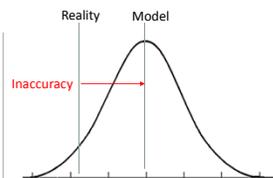
Issues and Concerns

- 15-year trend toward risk-based decision-making
 - ROP governing principle - Risk-informed!
 - SDP ≠ PRA
 - PRA outcomes are not point estimates



Issues and Concerns (continued)

- Decision-maker awareness of modeling assumptions, uncertainties and sensitivities
 - Initiating event frequencies
 - Common cause failure assumptions
 - Exposure times

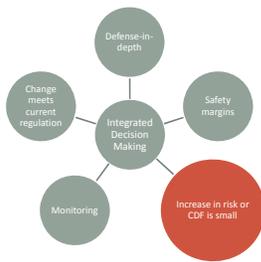


Consequences

- Differences in regional practices
- Often far more NRC resources spent assessing a specific licensee performance deficiency than spent on subsequent regulatory actions
 - “high” GREEN = “low” WHITE
- Often non-trivial licensee resources expended to refute NRC significance determination
 - Counter to safety?

4

Risk-informed Decision-making



(from RG 1.174)

- “All models are wrong, but some are useful”
- George Box
- What role does PRA play in the risk-informed decision-making process?
- How and when should other factors be considered?

5

The Streamlining Challenge

- Making more timely regulatory decisions using same or fewer resources
- Balancing the need for efficiency and effectiveness with founding ROP principles
- Outcomes must reasonably objective, repeatable and “scrutable”
- Independent, Open, Clear, Reliable and Efficient!

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