

Nuclear Risk Research Center (NRRC)
Central Research Institute of the Electric Power Industry (CRIEPI)
1-6-1 Otemachi, Chiyoda-ku, Tokyo, 100-8126, Japan

Dr. George Apostolakis
Director

January 20, 2025

Mr. J.W. Stetkar, Chairman
Technical Advisory Committee

Subject: TAC Report titled "INTERIM REVIEW OF RISK-INFORMED ON-LINE MAINTENANCE GUIDELINE" (13 January 2025)

Dear Chairman Stetkar:

We appreciate the interactions with TAC throughout the review of risk-informed On-Line Maintenance guideline and the Committee's insights. NRRC responds to TAC's recommendations as follows.

1. The current guideline states that internal event risk assessments should be conducted probabilistically, external event risk assessments deterministically, and risk management measures should be decided based on the assessment results.
This guideline will be revised to include internal and external events in both quantitative and qualitative assessments to determine risk management measures.
2. With regard to the management of items related to performance monitoring in on-line maintenance, we will consider what content should be added to the guideline and revise it as necessary.
3. The guideline will be revised to include a statement that advises guideline users to confirm that on-line maintenance has no significant impact on the frequency of Cs-137 release exceeding 100 TBq. The guidance for evaluating the frequency of a release of more than 100 TBq of cesium-

137 is available in the existing Level 2 PRA standards and safety improvement assessment guidelines.

We thank the TAC members for their continued assistance with updating the on-line maintenance guideline.

Sincerely,

A handwritten signature in blue ink, appearing to read "George Apostolakis", written in a cursive style.

George Apostolakis