



Section 50.69 would contain requirements to ensure that the PRA is adequate for this application. The proposed rule would require that as part of the categorization process defense-in-depth is considered, and that the revised treatment applied to RISC-3 SSCs be considered for its potential impact on risk. As an example, the Commission's position is that the containment and its systems are important in the preservation of the defense-in-depth philosophy (in terms of both large early and large late releases). As part of meeting the defense-in-depth principle, a licensee must demonstrate that the function of the containment as a barrier (including fission product retention and removal) is not significantly degraded when SSCs that support the functions are moved to RISC-3. Thus, the rule contains requirements for the IDP to consider

defense-in-depth as part of the categorization process.

The risk insights and other traditional information are required to be evaluated by an Integrated Decision-Making Panel (IDP) comprised of expert, plant-knowledgeable members whose expertise includes PRA, safety analysis, plant operation, design engineering, and system engineering. Because the IDP makes the final determination about the safety significance of an SSC, it is important that the membership include a variety of expertise about the plant, how it is operated, and the safety analyses (both deterministic and probabilistic), so that all pertinent information is considered. Hence the available deterministic and probabilistic information pertaining to SSC safety significance is considered in the decision process. The information considered must reflect the as-built and

as-operated plant, so that the decisions are based upon correct information, leading to proper categorization. Where applicable, the information is to come from a PRA that is adequate for this application (*i.e.*, categorization of SSC safety significance). From this perspective, the IDP decision process can be viewed as an extension of the previous process for determining SSC safety classification (*i.e.*, safety-related or nonsafety-related), in that it is making use of relevant risk information which was either not considered, or not available when the SSCs were initially classified. The IDP makes the final determination of the safety significance of SSCs using a process that takes all this information into consideration, in a structured, documented manner. The structure provides consistency to decisions that may be made over a period of time, and the documentation