



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 30, 1999

MEMORANDUM TO: Theodore S. Sherr, Chief
Licensing and International Safeguards Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Philip Ting, Chief
Operations Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

FROM: Melanie A. Galloway, Acting Chief
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

SUBJECT: BULLETIN 91-01 REVIEW PROCESS

Because the reporting of criticality safety events involving the violation of the double contingency principle can indicate safety, licensing, or regulatory issues which warrant NRC management attention, the Special Projects Branch is proposing that a team, comprised of representatives of each FCSS branch, be established within FCSS to review submitted Bulletin 91-01 reports on a regular basis and submit the results of its reviews to FCSS management with appropriate recommendations. The Special Projects Branch further proposes, given the high incidence of Bulletin 91-01 reports from the gaseous diffusion plants, that Mr. Larry Berg serve as chair of the team. Recommended team representatives are Mr. Dennis Damon (Licensing and International Safeguards Branch) and Ms. Sheryl Burrows (Operations Branch). The team will review the significance of criticality safety event reports on at least a monthly basis, and recommend to management such additional actions as requesting additional information, suggesting inspection followup, or performing on-site licensing reviews. Event significance will be evaluated by the team using the following criteria:

1. Does the report indicate which criticality safety parameters were impacted during the event? Does the report indicate whether the lost or degraded control solely protects the NCS parameter or provides defense in depth with at least one other control? Does the report indicate the significance of the loss of control (e.g., actual spacing to adjacent fissile bearing equipment)? Does the report indicate whether the as found condition is within the analyzed safety basis of the NCSE?
2. Based on the information in the report, does the failure of the control result in a decrease in effectiveness or reliability of the remaining controls associated with the impacted NCS parameter?
3. How many times has the situation of this lost or degraded control occurred at this particular facility?

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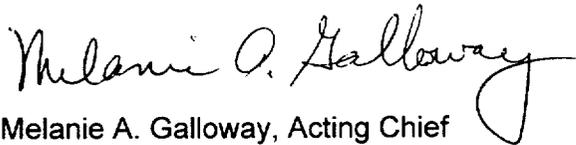
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Because the then Division Director and Deputy Division Director of FCSS have endorsed this concept previously, we are proposing that the team begin its function in January. While meetings are anticipated to occur monthly, an increased frequency may be required on occasion due to the volume of event reports. Mr. Larry Berg will contact Mr. Dennis Damon and Ms. Sheryl Burrows to coordinate the meeting time and place and event reports for review. Team members should have reviewed the event reports to be discussed prior to the meeting. This activity should not require more than 10% of each of the member's time. The first meeting will also focus on a plan for how the team will carry out its function.

Should you have any suggestions for further improving the team's function, please contact me or Larry Berg.

Sincerely,

A handwritten signature in cursive script that reads "Melanie A. Galloway". The signature is written in black ink and is positioned above the typed name and title.

Melanie A. Galloway, Acting Chief
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

December 30, 1999

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Sincerely,

signed by M. Galloway

Melanie A. Galloway, Acting Chief
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

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(*See previous concurrence)

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DATE	12/ 30 /99		12/ 22 /99		12/22 /99		12/ 30 /99		12/ 30 /99	

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3. How many times has the situation of this lost or degraded control occurred.

The event reporting review process will meet monthly beginning in January. Mr. Larry Berg will contact Mr. Dennis Damon and Ms. Sheryl Burrows to coordinate the meeting time and place. It is expected that the individual reviewers will have reviewed and commented on the event reports to be discussed prior to the meeting.

Sincerely,

Acting
Melanie A. Galloway, Chief
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

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