



POLICY ISSUE **(Notation Vote)**

March 30, 2000

SECY-00-0077

FOR: The Commissioners

FROM: William D. Travers
Executive Director for Operations

SUBJECT: MODIFICATIONS TO THE REACTOR SAFETY GOAL POLICY STATEMENT

PURPOSE:

To recommend to the Commission possible modifications to the Commission's Reactor Safety Goal Policy Statement in response to the Commission's Staff Requirements Memoranda on SECY-97-208, SECY-98-101, and SECY-99-191.

BACKGROUND:

The policy statement on reactor safety goals was initiated because of recommendations of the President's Commission on the Accident at Three Mile Island. The content of the policy statement was discussed in many forums before the Commission issued Safety Goals for the Operation of Nuclear Power Plants; Policy Statement in 1986 (Attachment 1). The Safety Goal Policy Statement expressed the Commission's policy regarding the acceptable level of radiological risk from nuclear power plant operation as follows:

Individual members of the public should be provided a level of protection from the consequences of nuclear power plant operation such that individuals bear no significant additional risk to life and health.

Societal risks to life and health from nuclear power plant operation should be comparable to or less than the risks of generating electricity by viable competing technologies and should not be a significant addition to other societal risks.

CONTACT: Ashok C. Thadani, RES
301-415-6641

The following quantitative objectives are used in determining achievement of the above safety goals:

The risk to an average individual in the vicinity of a nuclear power plant of prompt fatalities that might result from reactor accidents should not exceed one-tenth of one percent (0.1 percent) of the sum of prompt fatality risks resulting from other accidents to which members of the U.S. population are generally exposed.

The risk to the population in the area near a nuclear power plant of cancer fatalities that might result from nuclear power plant operation should not exceed one-tenth of one percent (0.1 percent) of the sum of cancer fatality risks resulting from all other causes.

This policy statement was not a regulation, but influenced various regulatory actions, primarily the development of the Regulatory Analysis Guidelines used in backfit analyses and the guidance developed for risk-informing reactor regulatory activities. Updating the policy statement will provide a current, high level statement of Commission intent that can guide the development of reactor rulemaking activities and changes in reactor regulatory practices. The reactor Safety Goals do not address environmental considerations, worker protection, nonreactor activities, or safeguards matters.

Subsequently, the Commission provided further direction on implementation of the Safety Goals to the staff by memorandum dated June 15, 1990 (Attachment 2), responding to SECY-89-102. This SRM covered many issues. Among them it directed the staff as follows:

The Safety Goals . . . are silent on the issue of cost but do provide a definition of "how safe is safe enough" that should be seen as guidance on how far to go when proposing safety enhancements, including those to be considered under the Backfit rule.

. . . . [T]he staff should strive for a risk level consistent with the safety goals in developing or revising regulations. In developing and applying such new requirements to existing plants, the Backfit Rule should apply.

Safety goals are to be used in a more generic sense and not to make specific licensing decisions.

. . . . [S]ubsidiary objectives should anchor, or provide guidance on "minimum" acceptance criteria for prevention. . .and mitigation. . .and thus assure an appropriate multi-barrier defense-in-depth balance in design.

By letter dated August 15, 1996 (Attachment 3), the ACRS issued a letter to the Chairman on risk-informed, performance-based regulation and related matters, which recommended, among other things, that safety goals should be used to derive guidelines for plant-specific actions, that the subsidiary goal for core damage frequency (10^{-4} per reactor-year) should be stated as a fundamental safety goal, and that the staff should consider the treatment of temporary changes in risk caused by configuration changes.

By memorandum dated July 2, 1997, Chairman Jackson requested the staff to provide a paper on the merits of the ACRS recommendation to elevate the subsidiary core damage frequency

goal. The staff responded in SECY-97-208, recommending that consideration of the safety goal modification be deferred until after completion of DG-1061, which when finalized became Regulatory Guide 1.174 and identified other issues that might be considered. The staff's recommendation was approved by SRM dated October 16, 1997. Status reports on these efforts were provided in SECY-98-101 and SECY-99-191, and the latter also requested Commission approval to study the feasibility of developing overarching safety principles for the agency. The Commission provided additional direction to the staff in related SRMs dated June 30, 1998, and October 28, 1999.

Guidance provided in these two SRMs included the following:

SRM on SECY-98-101

The revised policy statement should remain a high-level document describing the principles consistent with the Commission's views on "how safe is safe enough." The staff should be mindful that the revised Safety Goal Policy Statement needs to be consistent with the PRA Policy Statement, and should not include too many quantitative guidelines which would make the Safety Goal Policy Statement overly prescriptive.

SRM on SECY-99-191

The Commission has disapproved the staff's recommendation to proceed with a study of the feasibility of developing overarching safety principles as being premature in light of the ongoing efforts to transition to more risk-informed regulation. This effort should be delayed until experience is gained from the current changes to our regulatory structure so that we can build on a robust foundation. . . . The staff should still provide a recommendation to the Commission on whether to modify the current Safety Goal Policy Statement.

We have proceeded as directed to consider the potential changes to the Safety Goal Policy Statement that were presented in SECY-99-191. These consisted of the following topics in SECY-99-191:

- ▶ Plant-specific usage of safety goals
- ▶ Subsidiary objectives, including elevation of core damage frequency as a fundamental goal
- ▶ Treatment of uncertainty
- ▶ Use of safety goals to define "How safe is safe enough"
- ▶ Definition of adequate protection and defense in depth
- ▶ Societal risk
- ▶ Land contamination
- ▶ Temporary changes in risk

Each is discussed below. In this discussion, we have combined the first two topics of SECY-99-191 since they are inter-related, separated the discussion of defense in depth from that of adequate protection, treated adequate protection in the broader context of the structure of the safety goals, and added overall societal impact to the discussion of land contamination.

In doing so, we have concentrated on high-level policy issues and how they relate to current efforts in risk-informing the regulations and regulatory practices.

During our evaluation process, a public workshop was held on November 9, 1999, to discuss the advantages and disadvantages associated with each change under consideration. While attendance was not large, representatives did attend from NEI, Public Citizen, a utility, an architect-engineer, two State governments, consultants, national laboratories, and a foreign utility. Subsequent to the workshop, NEI also provided written comments.

No strong support for revising the Safety Goal Policy Statement was evident. The Public Citizen representative expressed concern that revised Safety Goals would be used to relax regulations and regulatory practices. He also expressed scepticism on the validity of current PRAs. The industry representatives indicated that the original policy statement served its stated objective well and has provided the foundation for improved safety-focused regulation. They indicated that the elevation of subsidiary metrics to fundamental goals would essentially create a new and much more conservative safety goal. They also expressed the view that several of the changes under consideration involve adding more detail to the Policy Statement. While important issues, they are implementation concerns and there is no need to expand the Policy Statement to include regulatory implementation details. Comments from the NRC staff and national laboratories tended to support updating the Policy Statement to make it consistent with current regulatory practices.

RELATIONSHIP BETWEEN SAFETY GOALS AND REGULATIONS

The safety goals are an expression of the high-level safety policy of the Commission. They provide guidance to the staff on how the existing regulations may be modified, and on how new regulations should be considered. As such, they have had a significant effect on the development of the Regulatory Analysis Guidelines. In efforts to risk-inform Part 50, the Safety Goals, once modified to incorporate current practices already approved by the Commission, will provide consistent guidance for future risk-informed regulation.

DISCUSSION OF POTENTIAL CHANGES UNDER CONSIDERATION

1. Changes To Reflect Current Policy, Including Plant-Specific Usage of Safety Goals and Definition of "How Safe is Safe Enough"

The Commission, in approving Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," established five general principles for using risk information in support of licensee-initiated licensing basis changes requiring NRC review and approval; the Commission also approved application of these principles on a plant-specific basis. In the staff's opinion, the establishment of these principles and their application on a plant-specific basis is a result of a significant policy consideration by the Commission on the use of risk information; these principles should be made more broadly applicable rather than stated solely in a regulatory guide applicable only to license amendments. As such, the intent of the principles also applies in the application of the safety goals, and a generalized set of principles should be expressed in Section V, Guidelines for Regulatory Implementation, of the Policy Statement, to provide guidance in interpreting and applying the Safety Goals in regulatory development.

The June 15, 1990, SRM contained substantial guidance on implementation of the safety goals. In the staff's view, two clarifying elements in that SRM should be incorporated into the Policy Statement itself in Section III.A, Quantitative Objectives Used To Gauge Achievement of The Safety Goals, General Considerations. These two points are:

- ▶ The Safety Goals establish a level of safety considered safe enough. They provide guidance on how far to go when proposing safety enhancements.
- ▶ The staff should strive for a risk level consistent with the safety goals in developing or revising regulations. In developing and applying such new requirements to existing plants, the Backfit Rule, 10 CFR Part 50.109, should apply.

The advantages of incorporating these items directly into the Safety Goal Policy Statement is to highlight their importance and to present consistent regulatory guidance in a higher level document than a regulatory guide or Staff Requirements Memorandum. They express a policy that Safety Goals are not limits, but something to strive to attain.

Recommendation

Modify the Policy Statement to clarify the Commission's intent and to reflect current practice. Current regulatory practice will not change; however, the Safety Goal Policy will provide a consistent basis for risk-informed regulation.

2. Subsidiary Objectives, Including Elevation of Core Damage Frequency as a Fundamental Goal

The ACRS in their May 11, 1998, letter has recommended that elevation of the core damage frequency as a fundamental goal be thoroughly scrutinized. The existing Policy Statement notes in the discussion of qualitative safety goals that

. . . . [T]he Commission intends to continue to pursue a regulatory program that has as its objective providing reasonable assurance, while giving appropriate consideration to the uncertainties involved, that a severe core damage accident will not occur at a U.S. nuclear power plant.

Options, therefore, include (1) making this statement a qualitative safety goal, (2) elevating the core damage frequency as a quantitative goal, or (3) taking no action and allowing the core damage frequency to remain a subsidiary goal.

Option 1. Qualitative goal

The major advantage of elevating the qualitative statement of prevention of severe core damage accidents to a qualitative goal is to clearly indicate the Commission's policy regarding the prevention of core damage accidents and the need for a balance between prevention and mitigation, since the other qualitative goals deal with risks to life and health.

We see no significant disadvantage.

Option 2. Quantitative goal

Including the quantitative value of the present subsidiary goal of a core damage frequency of 10^{-4} per reactor-year could be viewed as stating the Commission's expectation more clearly, and this could be its major advantage.

The major disadvantage of establishing a fundamental goal is that a goal of a core damage frequency of 10^{-4} per reactor-year could be more restrictive than the quantitative health objectives for most plants, and could establish, de facto, a new safety expectation compared to the quantitative health objectives.

Option 3. Maintain core damage frequency as a subsidiary quantitative objective.

A core damage frequency of 10^{-4} per reactor-year was proposed as a subsidiary objective in the June 15, 1990, SRM. As noted by the Commission, it "... appears to be a very useful subsidiary benchmark in making judgements about that portion of our regulations which are directed toward accident prevention." It provides a quantitative aiming point for the position already included in the Policy Statement that the Commission "... has as its objective providing reasonable assurance, while giving appropriate consideration to the uncertainties involved, that a severe core-damage accident will not occur at a U.S. nuclear power plant." It is also consistent with the guidance provided in Regulatory Guide 1.174.

Recommendation

We recommend both Options 1 and 3, elevating the qualitative statement in Section 2 of the Policy Statement to the status of a qualitative goal that the Commission has as its objective that a severe core-damage accident will not occur at a U.S. nuclear power plant, and retaining a quantitative value of 10^{-4} per reactor-year as a useful subsidiary performance objective. The 10^{-4} core damage frequency combined with a subsidiary objective for large early release frequency (LERF) (discussed later) provide practical implementation guidance for the quantitative health objectives consistent with current practice.

3. Treatment of Uncertainty

The current Safety Goal Policy Statement discusses treatment of uncertainties at some length. It stresses the need to consider potential uncertainties in regulatory decisionmaking. While it adopted mean estimates for implementing the quantitative objectives, it also asserted the need to understand the important uncertainties in risk predictions. Since the Safety Goal Policy Statement was formulated, considerable effort has been directed to improving uncertainty analysis by industry, government, and academia. Guidance is provided in Regulatory Guide 1.174 on the importance of consideration of not only parameter uncertainty, but also model uncertainty and completeness uncertainty in risk-informed decisions that represent the state of the art in uncertainty analysis.

Recommendation

The staff suggests that the more general portions of Regulatory Guide 1.174, Section 2.2.5, be incorporated, as appropriate, in the Policy Statement (Section IV). The advantage to so doing would be to reflect improvements made in analytical methods over the past 14 years. We see no major disadvantage. Current regulatory practice will not change.

4. Defense in Depth

In the existing Policy Statement, the Commission noted that current NRC regulations require conservatism in design, construction, testing, operation, and maintenance of nuclear power plants and indicated a defense-in-depth approach has been mandated in order to prevent accidents from happening and to mitigate their consequences. This importance of defense in depth is also clearly presented in the cornerstones of the reactor oversight process that relies on multiple lines of defense. In item 1 above, we have suggested that a generalized form of the principles of risk-informed regulatory decisionmaking from Regulatory Guide 1.174 be added to the Policy Statement. One of these generalized principles is that the defense in depth philosophy should be maintained. With this change, the need to consider defense in depth would be highlighted in a revised Policy Statement. In the Commission's White Paper on Risk-Informed and Performance-Based Regulation, guidance is given that

Risk insights can make the elements of defense-in-depth more clear by quantifying them to the extent practicable. Although the uncertainties associated with the importance of some elements of defense may be substantial, the fact that these elements and uncertainties have been quantified can aid in determining how much defense makes regulatory sense. Decisions on the adequacy of or the necessity for elements of defense should reflect risk insights gained through identification of the individual performance of each defense system in relation to overall performance.

Recommendation

We suggest that this portion of the White Paper be incorporated into the Policy Statement. The major advantage is to update the Policy Statement to reflect Commission views with respect to the role of defense in depth in a risk-informed regulatory framework, of which the safety goals are a key element. We see no major disadvantages. Current regulatory practice will not change.

We note the ACRS and ACNW are developing additional recommendations to the Commission in the area of defense in depth.

5. Safety Goal Structure and Adequate Protection Considerations

In its May 11, 1998, letter, the ACRS proposed consideration of the structure of the safety goals. They stated

. . . [A]n additional important conceptual issue is whether the objectives should be stated in terms of a single goal or a goal and an upper limit. The current Policy Statement specifies only a single goal for each objective. . . . An upper limit and a goal define three

regions. For risk levels above the upper limit, immediate action should be taken. For risk levels between the upper limit and the goal, the possibility of reducing the estimated metric should be investigated, taking into account costs and benefits. For risk levels below the goal, no action would be required. This approach would be consistent with the "risk-informed" philosophy, which recognizes that risk metrics are only part of the decisionmaking process, but if the value of a risk metric were found to be very large, this would lead to immediate action.

We have evaluated this suggestion, considering a similar structure that already exists in our regulatory framework from the Backfit Rule (10 CFR 50.109). This also essentially identifies three regions, viz., (1) a region governed by 10 CFR 50.109 (a)(4) and (a)(5) in which backfits are required if necessary to ensure adequate protection, (2) a region governed by 10 CFR 50.109(a)(3) in which backfits are allowed if there is a substantial increase in overall protection and the direct and indirect costs are justified in view of the increased protection, or are necessary to bring a facility into compliance with a license or the rules or orders of the Commission¹, and (3) a region in which backfitting is not allowed because it cannot pass the tests above. The existing Safety Goal Policy Statement has been used in developing the Regulatory Analysis Guidelines, which provide guidance on when and how to conduct regulatory analyses for rulemaking and provide a basis for determining the demarcation where costs no longer justify the benefits.

The existing safety goals do not address an upper limit. As noted in SECY-99-246, although the concept of "adequate protection" is clarified by several NRC guidance documents (such as COMSAJ-97-008) and is the basis for our safety determination, the term "adequate protection" and the equivalent phrase "no undue risk" are not explicitly and concisely defined in the Atomic Energy Act. Quantitative (absolute) risk estimates serve as an important measure of plant safety, but do not embody the full range of considerations that enter into the judgment regarding adequate protection. The judgment regarding adequate protection derives from a more diverse set of considerations, such as acceptable design, construction, operation, maintenance, modification, and quality assurance measures, together with compliance with NRC requirements, including license conditions, orders, and regulations.

Consistent with the Commission's October 28, 1999, SRM on SECY 99-191, the staff will only consider defining "reasonable assurance of adequate protection" quantitatively after experience is gained with the various risk-informed approaches now being implemented.

We note that the Center for Strategic & International Studies, in their report "The Regulatory Process for Nuclear Power Reactors -- A Review", called for a succinct statement of safety philosophy and a clear definition of adequate protection as essential for the benefit of all stakeholders. Updating the Reactor Safety Goal Policy Statement to describe the role of the Regulatory Analysis Guidelines and the Backfit Rule will provide a current statement of overall safety philosophy.

¹ Certain regulations which are necessary to reasonable assurance of adequate protection would fall into the first region.

Recommendation

No change to the Policy Statement is recommended. A structure similar to that proposed by the ACRS already exists in the regulations and other implementing documents. As experience is gained with use of risk information in regulatory practices, it may be appropriate to consider the degree to which risk analyses and defense in depth can be used to provide better definition of the upper limit.

6. General Performance Guideline for Frequency of a Large Release of Radioactive Material

In the 1986 Policy Statement, The Commission proposed for staff examination a "general performance guideline" that the overall mean frequency of a large release of radioactive materials to the environment from a reactor accident should be less than 1 in 1,000,000 per year of reactor operation.

SECY-93-138 evaluated the development and usefulness of a large release definition and recommended that work on a definition should be terminated. This was based on the fact that such a guideline would be more restrictive than the quantitative health objectives, regardless of definition, and that a framework for regulatory decision-making was proposed in the Regulatory Analysis Guidelines. This framework did not require a large early release to be defined and quantified. Termination of effort was approved in the related SRM dated June 10, 1993. The Regulatory Analysis Guidelines were later approved by the Commission.

Since that decision, the Commission has defined Large Early Release Frequency (LERF) in its White Paper. Further, the ACRS in its May 11, 1998, letter has observed that a LERF objective of 10^{-5} per reactor-year, not 10^{-6} per reactor-year, is consistent with the quantitative health objective on early fatalities and, therefore, could be considered a surrogate goal. This value of LERF would also be consistent with the guidance in Regulatory Guide 1.174 and the Regulatory Analysis Guidelines for backfits.

Beyond this, there is a question of whether a subsidiary goal is needed for large early release frequency, similar to the subsidiary goal on core damage frequency discussed above. To be consistent with the guidance in Regulatory Guide 1.174 and with the early fatality quantitative health objective, a subsidiary goal for Large Early Release Frequency would be 10^{-5} per reactor-year.

The principal advantages of so doing are to establish clearly the need to balance prevention and mitigation and to provide practical guidance for implementing the safety goal quantitative health objectives. The use of Large Early Release Frequency eliminates the inherent uncertainties in Level 3 PRA calculations and represents a calculated parameter based on activities under licensees' control.

The principal disadvantage is that it may add an unnecessary goal, in that the large early release frequency is also controlled by the quantitative health objective on early fatality risk.

Recommendation

Delete reference to the general performance guideline. Incorporate a Large Early Release Frequency subsidiary goal of 10^{-5} per reactor-year. Current regulatory practice would not change, but the Safety Goal Policy would now provide a better foundation for the subsidiary objectives currently being used.

7. Societal Risk

As noted in SECY-99-191, societal risk is addressed through a qualitative statement and a quantitative health objective in the current Policy Statement. The quantitative health objective is as follows:

The risk to the population in the area near a nuclear power plant of cancer fatalities that might result from nuclear power plant operation should not exceed one-tenth of one percent (0.1 percent) of the sum of cancer fatality risks resulting from all other causes.

In applying the objective for cancer fatalities, the Commission defined the population generally considered subject to significant risk as the population within 10 miles of the plant site. The 1983 draft of the Safety Goal Policy Statement defined the distance as 50 miles. This was reduced to 10 miles in the 1986 Policy Statement that was issued to recognize that the area subject to significant risk would be close to the plant, i.e., choosing a larger distance would lead to a lower estimate of the fractional effect.

The Regulatory Analysis Guidelines, on the other hand, are used to evaluate changes to rules under the Backfit Rule and integrate societal dose to 50 miles. In this case, because integrated person-rem are considered, use of a larger distance leads to a higher estimate of the integrated effect on calculated collective dose. This increase arises from the potential exposure of large numbers of people to relatively small doses at distances greater than 10 miles from the plant. Further, the Regulatory Analysis Guidelines consider the potential for land interdiction as a result of contamination, which may extend beyond 10 miles from the site.

We have considered the questions (1) Need the two documents be consistent? and (2) Should either the Policy Statement or the Regulatory Analysis Guidelines be changed? Further, questions have been raised regarding the calculational technique used for safety goal comparisons.

The major advantage of making these documents consistent in terms of the distance selected is that it would focus attention on that area where dose is usually the highest. For implementation of the quantitative health objective, the incremental effect of plant risk should be compared with the population experiencing the majority of that risk, and a 10 mile distance is appropriate for that purpose. However, conversely, the two documents serve different purposes, and for proposed rules, a conservative value may not be inappropriate to evaluate the person-rem averted in the regulatory analysis, provided that the implications of all significant assumptions and boundary conditions are developed.

Societal risk in the qualitative safety goals is considered in terms of the fractional contribution of reactor-generated risks to those from all other causes. Typically this is done by calculating the

risk to the average individual within the 10-mile radius, but the calculational technique is not specified in the Policy Statement. However, the overall societal risk is not considered directly. Considering the formulation of the qualitative safety goals and the intent that the quantitative health objectives derive from them, the consideration of risks as a fractional contribution of overall risk is appropriate, and no change in approach is needed.

Recommendation

We believe the 10-mile zone stated in the existing policy statement is adequate and need not be changed. Likewise, the staff recommends that the 50-mile zone stated in the Regulatory Analysis Guidelines need not be changed.

A broader question remains. Is a new overall societal impact safety goal needed? This is best discussed with the question of land contamination, below.

8. Land Contamination and Overall Societal Impact

The Commission's Strategic Plan recognizes a continuing obligation to conduct regulatory functions in a manner that is both responsive to environmental concerns and consistent with the Commission's responsibility as an independent regulatory agency for protecting the radiological health and safety of the public. We have considered whether an additional safety goal or subsidiary objective is needed to reflect these considerations at a high level. An addition would provide a clear message of Commission intent on the importance of the consideration of contamination of the environment following a severe accident and on the need to consider overall societal impact.

Risk analyses (e.g., NUREG-1150) indicate that, in the case of a severe accident involving large off-site releases, a significant portion of the population dose (person-rem) comes from the ground shine and ingestion dose resulting from land contamination, rather than from a cloud inhalation dose. The magnitude of this dose, thus, is strongly affected by protective measures employed after an accident, particularly evacuation, relocation, and land interdiction. Thus, the dose criteria chosen to allow future use of contaminated land strongly affect the extent of land interdiction that might occur. Calculations in NUREG-1150 are based on use of the EPA's Protective Action Guides that basically call for relocation of people and interdiction of land if the projected first-year dose exceeds 2 rem or any succeeding year exceeds 0.5 rem. However, up-to-date tools are needed to better understand the extent of land contamination and societal impact. In developing these tools, we also need to consider the ongoing activities of the International Commission on Radiological Protection (ICRP) on protection of the public in situations of prolonged radiation exposure.

Most PRAs or Individual Plant Examinations have not explicitly calculated the risk of land contamination. Although land contamination is considered as part of the Regulatory Analysis Guidelines, based on information derived from NUREG-1150, current calculational tools to perform Level 3 PRAs have significant weaknesses that limit the utility of predictions of land contamination and collective dose at significant distances from the plant.

Recommendation

The staff recommends that no additional safety goal be developed in this area. The Policy Statement should acknowledge that the strategic plan does consider environmental protection and add a qualitative statement that there be no adverse impact on the environment, however. Development of the necessary tools for improved regulatory analyses will be considered in the Planning, Budgeting, and Performance Management (PBPM) process.

9. Temporary Changes in Risk

In SECY-99-191, the staff noted that the Safety Goal Policy should consider in general terms the Commission's policy regarding temporary changes in risk as a result of equipment failures, maintenance activities, and human actions. The existing Policy Statement states:

The Commission's first qualitative safety goal is that the risk from nuclear power plant operation should not be a significant contributor to a person's risk of accidental death or injury. The intent is to require such a level of safety that individuals living or working near nuclear power plants should be able to go about their daily lives without special concern by virtue of their proximity to these plants.

Details of how to consider the impact of temporary configuration changes in applying this goal are complex, but they are implementation issues and need not be in the Policy Statement itself. This should not affect current regulatory practice, since many features associated with configuration control are already considered under the maintenance rule.

Recommendation

The staff does not recommend any changes to the Safety Goal Policy with regard to changes in temporary risk.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection. The Office of the Chief Financial Officer has reviewed this Commission paper for resource implications and has no objections. The Office of the Chief Information Officer has reviewed the Commission Paper for information technology and information management implications and concurs in it. This paper was discussed with the ACRS at its meeting on February 3, 2000. They plan to issue their views to the Commission after their April meeting.

RESOURCES AND RECOMMENDATION:

The staff recommends that the Commission authorize the staff to modify the Reactor Safety Goal Policy Statement as presented above, incorporating the latest policy guidance, and making it consistent with current practice within the next six months. Resources of less than 1 FTE will be needed to modify, seek public comment, and republish the Policy Statement and will be reprogrammed within RES. Implementation issues will be considered through the normal Planning, Budgeting, and Performance Management process.



William D. Travers
Executive Director
for Operations

Attachments:

1. Policy Statement for Safety Goals for the Operations of Nuclear Power Plants - 1986
2. June 15, 1990, Staff Requirements Memorandum
3. August 15, 1996, ACRS Letter to NRC Chairman

Commissioners' completed vote sheets/comments should be provided directly to the Office of the Secretary by COB Thursday, April 13, 2000.

Commission Staff Office comments, if any, should be submitted to the Commissioners NLT April 6, 2000, with an information copy to the Office of the Secretary. If the paper is of such a nature that it requires additional review and comment, the Commissioners and the Secretariat should be apprised of when comments may be expected.

DISTRIBUTION:

Commissioners
OGC
OCAA
OIG
OPA
OCA
ACRS
CIO
CFO
EDO
REGIONS
SECY