

April 5, 2000

MEMORANDUM TO: Hubert J. Miller, Regional Administrator, Region I  
Luis A. Reyes, Regional Administrator, RII  
James E. Dyer, Regional Administrator, RIII  
Ellis W. Merschoff, Regional Administrator, RIV

FROM: William M. Dean, Chief */RA/*  
Inspection Program Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

SUBJECT: MANUAL CHAPTER 0609, SIGNIFICANCE DETERMINATION  
PROCESS

Attached is Manual Chapter IMC 0609, Significance Determination Process. The document, which was provided to your staff by email earlier this week, consists of a general description of the process, SDPs supporting each cornerstone (Appendices A - H), and enforcement, appeal and other SDP-related guidance (Supplements 1-4). The Shutdown Safety SDP (Appendix G) and the Containment SDP (Appendix H) are being issued for implementation, however, we will continue with feasibility reviews that should be completed by the end of April. Since your staff did not have an opportunity to review some of the changes described below and the document has been substantially revised to address previously submitted comments from the regions and pilot program lessons learned, we would appreciate any feedback over the next several weeks.

Please note that the Phase 2 plant specific worksheets for the reactor safety SDP have not all received the planned site visit review. Site visits are in progress. Until such time that the site visits are completed and the results incorporated into the worksheets, risk analyst review should be conducted for all Phase 2 evaluations to assure there is appropriate conservatism in the results. Note that NRR's Probabilistic Safety Assessment Branch has formed an operations support team to assist the regions in this effort throughout the period of initial implementation.

The following significant changes, have been made to IMC 0609 (Significance Determination Process) since it was last issued in DRAFT form in August 1999.

1. Re-organization - The Chapter has been reorganized into a main body dealing with guidance applicable to all cornerstone SDPs, Appendices dealing with specific SDPs, and Supplements giving more detail for certain program aspects than was warranted in the main body. Each Appendix will eventually contain both user guidance for that SDP and basis information. This work is an ongoing improvement initiative.
2. SDP and Enforcement Review Panel Procedures - Detailed process and procedural guidance is provided in para. 0609-08 and in Supplement 1. Para. 0609-08 clarifies the designation of findings as Unresolved Items, the use of "apparent significant

- finding” combined with a preliminary color greater than green, and the review role of the Safety Evaluation Review Panel (SERP).
3. A revised screening process for entering a finding into the SDP (previously found in MC 0610\*) is discussed in para. 0609-09 and in Supplement 2.
  4. A process for licensee appeal of the staff’s final significance determination is described in para. 0609-10 and in Supplement 3.
  5. Policy regarding using the SDP for findings that are not violations is given in para. 0609-11.
  6. Appendix A (Reactor Safety SDP for At-Power Situations) -
    - a. A basic step-by-step user guidance desk-aid is provided (Appendix A, Attachment 1, para. A.1.05), which includes the Phase 1 Worksheets and SDP Tables 1 (updated with modified M/L LOCA frequencies), 2, and 3. Detailed guidance for each step is then provided in para. A.1.06.
    - b. External Events screening questions are incorporated into the Phase 1 screening work sheets and the Phase 2 user guidance (Step 2.5)
    - c. Containment Barriers screening questions are incorporated into the Phase 1 worksheet and the Phase 2 user guidance (Step 2.6)
  7. Updated EP SDP is in Appendix B
  8. Updated Occupational RP SDP is in Appendix C
  9. Updated Public RP SDP is in Appendix D
  10. Updated Physical Protection SDP is in Appendix E
  11. Updated Fire Protection Barrier/Suppression Findings SDP is in Appendix F
  12. New Shutdown Risk SDP is in Appendix G. The process directs the inspectors to collect data on the shutdown SDP check lists and submit the information to a HQ risk analyst.
  13. New Containment SDP is in Appendix H.

cc: A. Randolph Blough, Director, Division of Reactor Projects, RI  
Wayne D. Lanning, Director, Division of Reactor Safety, RI  
Loren R. Plisco, Director, Division of Reactor Projects, RII  
Charles A. Casto, Director, Division of Reactor Safety, RII  
Geoffrey E. Grant, Director, Division of Reactor Projects, RIII  
John A. Grobe, Director, Division of Reactor Safety, RIII  
Kenneth E. Brockman, Director, Division of Reactor Projects, RIV  
Arthur T. Howell, III, Director, Division of Reactor Safety, RIV  
Larry Bell, Technical Training Center, Office of Human Resources  
Rich Barrett, Chief, Probabilistic Safety Assessment Branch, NRR  
Mark Cunningham, Chief, Probabilistic Risk Assessment Branch, RES

- finding” combined with a preliminary color greater than green, and the review role of the Safety Evaluation Review Panel (SERP).
3. A revised screening process for entering a finding into the SDP (previously found in MC 0610\*) is discussed in para. 0609-09 and in Supplement 2.
  4. A process for licensee appeal of the staff’s final significance determination is described in para. 0609-10 and in Supplement 3.
  5. Policy regarding using the SDP for findings that are not violations is given in para. 0609-11.
  6. Appendix A (Reactor Safety SDP for At-Power Situations) -
    - a. A basic step-by-step user guidance desk-aid is provided (Appendix A, Attachment 1, para. A.1.05), which includes the Phase 1 Worksheets and SDP Tables 1 (updated with modified M/L LOCA frequencies), 2, and 3. Detailed guidance for each step is then provided in para. A.1.06.
    - b. External Events screening questions are incorporated into the Phase 1 screening work sheets and the Phase 2 user guidance (Step 2.5)
    - c. Containment Barriers screening questions are incorporated into the Phase 1 worksheet and the Phase 2 user guidance (Step 2.6)
  7. Updated EP SDP is in Appendix B
  8. Updated Occupational RP SDP is in Appendix C
  9. Updated Public RP SDP is in Appendix D
  10. Updated Physical Protection SDP is in Appendix E
  11. Updated Fire Protection Barrier/Suppression Findings SDP is in Appendix F
  12. New Shutdown Risk SDP is in Appendix G. The process directs the inspectors to collect data on the shutdown SDP check lists and submit the information to a HQ risk analyst.
  13. New Containment SDP is in Appendix H.

**DISTRIBUTION:** PUBLIC

NRC File Center

IIPB R/F

**Accession: #ML003698447**

Template: #NRR106

To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

<b>OFC:</b>	NRR/IIPB		NRR/IIPB		NRR/IIPB						
<b>NAME:</b>	Pkoltay *		CHolden		WMDean						
<b>DATE:</b>	4/04/00		4/05/00		4/05/00						