

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER DICUS
SUBJECT: **SECY-00-0007 - PROPOSED STAFF PLAN FOR LOW
POWER AND SHUTDOWN RISK ANALYSIS RESEARCH TO
SUPPORT RISK-INFORMED REGULATORY DECISION
MAKING**

Approved x Disapproved x Abstain

Not Participating

COMMENTS:

See attached comments.

Aneta Jay Dicus
SIGNATURE

March 22, 2000
DATE

Entered on "STARS" Yes x No

COMMISSIONER DICUS' COMMENTS ON SECY-00-007, "PROPOSED STAFF PLAN FOR LOW POWER AND SHUTDOWN RISK ANALYSIS RESEARCH TO SUPPORT RISK-INFORMED REGULATORY DECISION MAKING"

The staff has made substantial progress in bounding some of the aspects of risk associated with low power and shutdown operations and has indicated that current methods provide a strong foundation for considering LPSD accident risk. In addition, licensees have developed qualitative and quantitative tools for managing safety during LPSD operations. So the issue appears to become --what additional information is needed to support regulatory decision-making? In this area, I believe the staff has not advanced compelling arguments and has not provided a substantial or persuasive discussion that describes the cost-benefit or fully explains the tangible regulatory results.

I believe that continued efforts to develop an ANS low power and shutdown PRA standard are worthwhile. Therefore, I approve continued participation in the ANS's work to develop LPSD PRA standards (Part 1 of proposed research plan).

Under Part 4 of the proposed research, I support further evaluation of certain areas as potentially important to risk and believe that the staff should consider stakeholder input. However, the staff should develop criteria for considering and prioritizing these research efforts. Emphasis should be placed on those areas of common interest with our cooperative research partners and areas where research resources and cost can be appropriately leveraged. Before proceeding on additional research activities, the staff should provide the Commission with its criteria for prioritizing these areas, more detailed discussion of ongoing activities in those areas of interest (e.g., NRC, industry, national and international), a qualitative and quantitative discussion of the expected regulatory benefits, and a breakdown of resources expected to be expended on each activity.

The staff should provide additional information on how low power and shutdown operations is already considered, if at all, in the ongoing human reliability analysis (HRA) program.