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NUCLEAR REGULATORY COMMISSION ISSUES POLICY STATEMENT
ON AVAILABILITY AND ADEQUACY OF DESIGN BASIS INFORMATION

The Nuclear Regulatory Commission has issued a Policy Statement setting forth its expectations and outlining future agency actions relating to the availability and adequacy of design information at licensed nuclear power plants.

The Policy Statement places emphasis on the Commission's view that nuclear power plant facilities should not be modified without a clear understanding of the applicable engineering design bases.

The Policy Statement comes in the wake of repeated NRC staff inspection findings that some licensees have not adequately maintained their design bases information as required by NRC regulations.

In response to these findings and self-identified problems, most nuclear power plant licensees have initiated, over the past several years, design bases reconstitution programs-- identification of missing design documentation and selective regeneration of missing documentation as required. In addition, the Nuclear Utilities Management and Resources Council, Inc. (NUMARC) has developed "Design Basis Program Guidelines" for the voluntary use of utility licensees.

The Commission's evaluation of the status of reconstitution programs to date clearly indicates that the licensees' substantial investment in these programs should yield positive safety benefits for a majority of the sites. However, the Commission remains concerned that some situations exist where licensees have not critically examined their design control and configuration management process to identify measures necessary to ensure that technically adequate and accessible design basis documentation is maintained.

Accordingly, the Commission believes that a licensee should be able to show that it has sufficient documentation, including

calculations or pre-operational, startup or surveillance test data, to conclude that the current facility configuration is

consistent with its NRC-approved design bases. In addition, the design bases must be understood and documented to support operability determinations and other evaluations that may need to be made quickly in response to plant events and should be retrievable within a period of time commensurate with the safety significance of the information.

As part of this effort, the NRC staff will, in the future:

- issue a generic letter requesting all licensees to describe the programs that are in place to ensure that design information is correct, provide a completion schedule for any ongoing program, or justify any decision not to implement a design reconstitution program.

- prioritize NRC engineering inspections to focus on the results of licensee management of design bases and plant configuration based on responses to the generic letter and other plant-specific information;

- modify the Systematic Assessment of Licensee Performance (SALP) process to include an assessment of licensee programs to control design bases information; and

encourage self-identification of design bases issues through application of the provisions of the Commission's enforcement policy, pursuing enforcement actions for engineering deficiencies whose root cause lies in the inadequacy or unavailability of design bases information and which are identified by NRC inspections.

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