

April 14, 2000

MEMORANDUM TO: Frank J. Congel, Director
Incident Response Operations
/RA by Martin J. Virgilio, Acting For/
FROM: William F. Kane, Director
Office of Nuclear Material Safety
and Safeguards
SUBJECT: REVISION OF MANAGEMENT DIRECTIVE 8.3, "NRC INCIDENT
INVESTIGATION PROGRAM"

We have reviewed the proposed revisions to Management Directive 8.3, per your memorandum of March 17, 2000, and have the following comments:

1. The Directive should be revised to align its objectives (8.3-02) to the performance goals for the reactor, waste, and materials arenas, as described in the agency's draft Strategic Plan (NUREG-1614).
2. The Handbook should be revised to revise the definition of a significant operational event ((I)(A)(5)) by linking it to the strategic and performance measures contained in the draft Strategic Plan. This approach would provide more objective, predictable, and consistent criteria for determining which events constitute significant operational events. The current definition appears to be too broad and vague. For example, by referring to "actual or potential hazard to public health and safety, property, or the environment," a significant operational event could be relatively insignificant, such as the exposure to several millirem of ionizing radiation. In addition, linking the definition to the performance measures would also broaden the definition to include significant safeguards (v. safety and environmental) events.

Under the revised definition, the threshold for an Incident Investigation Team (IIT) could be any exceedence of the strategic measures. In a similar manner, the Augmented Inspection Team (AIT) threshold could be aligned with the performance measures. The existing thresholds for an IITs and AITs are too low. For example, the existing threshold for an IIT in ((I)(A)(5)(b)(i)(a)) corresponds to a potential dose to members of the public in the range of tens of millirem. In addition, linking the thresholds to the strategic and performance measures would provide more objective criteria for AITs and IITs for safeguards events.

3. There does not appear to be a compelling need to extend the Special Inspections (SIs) to significant operational events in the materials and waste arenas. The Office of Nuclear Material Safety and Safeguards and the Regions have been effectively determining the need for specialized inspections under the existing program framework for inspections in the materials and waste arenas.

4. The Risk Criteria section of the Handbook ((I)(C)) could be strengthened by extending the discussion to apply to analysis of events in the materials and waste areas. For example, we believe that the addition of such criteria for fuel cycle facilities is desirable and timely, as we are currently finalizing risk-informed, performance based requirements for fuel cycle processing facilities and revising our fuel cycle facility oversight program to adopt a more risk-informed performance-based approach. We would expect to be able to develop and apply the new criteria within about one year. Similar initiatives are underway in the medical area. We would be pleased to work with IRO to update the MD 8.3 Handbook as these and other initiatives progress.
5. We noted that the objectives for AITs ((III)(A)) ironically appear to be broader than the objectives for IITs ((II)(A)). We suggest that the IIT objectives be broadened to reflect the greater significance of events for which IITs are conducted. In addition, we suggest that safeguards be incorporated into the objectives for AITs in ((III)(A)).

If you have any questions or comments about our review, please contact Bill Troskoski at 415-8076.

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