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May 31, 2000

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Mr. David L. Meyer, Chief
Rules and Directives Branch
Division of Administrative Services
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Meyer:

**PROPOSED NEW APPENDIX TO STANDARD REVIEW PLAN
(NUREG-0800), CHAPTER 19, "USE OF PROBABILISTIC RISK
ASSESSMENT IN PLANT-SPECIFIC, RISK-INFORMED
DECISIONMAKING: GENERAL GUIDANCE"**

Virginia Power appreciates the opportunity to comment on the proposed guidance for the NRC staff on the use of risk information in instances where license amendment requests appear to meet regulatory requirements but raise significant risk concerns due to special circumstances associated with the request. The request for comment appeared in the Federal Register, Vol. 65, No. 69, on Monday, April 10, 2000, pages 19030-19034.

We endorse the comments submitted by the Nuclear Energy Institute (NEI) and offer the following comments:

In its current form the Appendix creates a new administrative burden on NRC staff:

"license amendment requests will be screened for potential risk implications as part of the license amendment review process".

All future license amendments will need to be evaluated for potential risk implications. The initial screening is to be done as part of the normal review and passed on to PRA analysts if necessary.

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Add: R. Palla (r/p3)

This process, which is described in a flow chart listed as Figure 1, seems to place a lot of burden on the staff for a potentially few instances where the potential risk increase may be larger than the RG1.174 guidelines. Of the four types of risk submittals that might require risk analysis, the first three would be much less likely to require risk review. The fourth item, titled "special circumstances", includes four examples for which the typical reviewer probably has only limited training. Therefore, it is recommended that a better defined screening process be developed which will allow the reviewer to quickly screen most applications or that the risk analysts do the screening. Otherwise, weeks of review time are likely to be added to the process.

Also, the sentence: "If upon further consideration it is *believed* that approval of the request would ..." should be restated in terms of the facts in the submittal not someone's belief.

The following individuals are available to answer any questions or provide clarification concerning Virginia Power's comments:

Dave Bucheit Dave_Bucheit@dom.com or (804) 273-2264, or

Gwen Newman Gwen_Newman@dom.com or (804) 273-4255

Respectfully,



James H. McCarthy, Manager
Nuclear Licensing and Operations Support