

August 25, 2000

Mr. Ralph E. Beedle, Senior Vice President
and Chief Nuclear Officer
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, D.C. 20006-3708

Dear Mr. Beedle:

I am responding to your letter of August 11, 2000, in which you expressed concerns that we intend to include prescriptive licensing requirements for plant equipment that has been determined to be of low safety significance by a risk-informed Part 50 Option 2 categorization process. As I discussed with you on August 11, 2000, prior to receiving your letter, it is not our intent to impose prescriptive requirements on low safety significant structures, systems and components (termed RISC-3s).

One objective of risk informing the special treatment requirements of Part 50 is that the resulting regulatory framework will enable both the staff and the industry to focus attention and resources on what is truly safety significant. As you are aware, to support this approach, we are developing a framework that incorporates a robust categorization process. Our objective for RISC-3 equipment is that it remain capable of performing its design functions, but with less assurance. Furthermore, it is our intent to require only those regulatory controls necessary to accomplish this objective. We currently envision that there will be high level requirements to maintain RISC-2 and RISC-3 functional capability, supported with a requirement to describe how these high level requirements are met in the updated final safety analysis report. We also discussed this conceptual approach with the South Texas Project Nuclear Operating Company (STPNOC) and plan to work out the details of this approach as part of our review of the STPNOC exemption request. We anticipate that our approach will continue to evolve as we learn more from the STPNOC exemption review and as we further develop the rulemaking approach for RIP50 Option 2.

I expect that there will be a continuing dialogue with the industry and other stakeholders regarding this issue. Your continuing comments on this important subject are appreciated.

Sincerely,

/RA/

Samuel J. Collins, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission

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