

NOTES TO ACCOMPANY NEI REVISIONS OF SRP CHAPTER 11

Industry has reviewed the NRC July 2000 revision of SRP Chapter 11. We understand that the NRC is still evaluating the specific comments on this chapter that were submitted by industry in April, 2000 and so there may be some unintended repetition of the comments made in April in this proposed August 2000 revision of the chapter.

We are still concerned with the complexity of Chapter 11, the amount of information that is solicited for inclusion in the license application and the detail that is required to describe individual Management Measure Programs. We contend that the license application should focus on high-level applicant commitments and that detailed supporting information should be maintained at the facility for inspection by the NRC. Existing licensees could not meet the new proposed Chapter 11 Management Measure requirements. We are, therefore, concerned that Chapter 11 continues to impose an ominous burden on licensees that cannot be justified from a health and safety viewpoint.

The new flexibility offered in the July 2000 revision of Chapter 11 to excuse the applicant from treating QA as a separate Management Measure is welcome. It supports industry's long-held contention that QA is an integral component of all Management Measures and should be used to support the other Management Measures.

Addition of Appendix C to Chapter 11 – to document the level of detail expected in a license application – is not useful in its current form. Industry had been seeking concrete guidance from the NRC staff on how the description of a Management Measure in a current NRC-approved license would have to be “enhanced” to meet the new Chapter 11 expectations. We understood that the staff would examine current licensee descriptions of one or more management measures and show specifically what additional text, or discussion of what additional issues, would have to be added. Industry has completely re-written Appendix C to achieve this goal for the Maintenance Management Measure. Although the staff objects in principle to inclusion of “sample text” in the SRP (perhaps out of fear that such text may become “boiler plate” text that is simply incorporated into all license applications), the continuing divergence in expectations between the staff and licensees on the level of Management Measure detail in a license application warrants inclusion of an Appendix C such as that prepared by industry.

Industry has revised the July 2000 revision of Chapter 11 with the following objectives in mind:

- (1) reduce the redundancy among individual sections. (Even following our revision, there is unnecessary repetition of the contents of §11.3 ('Areas of Review'), §11.4 'Acceptance Criteria' and §11.5 ('Review Procedures')).
- (2) ensure consistency between industry practice and what is stated in the SRP
- (3) reduce the prescriptiveness

(4) correct technical, grammatical and editorial errors

These explanatory notes are accompanied by two versions of Chapter 11: (i) a red-lined version that explains why individual edits were made, and (ii) a “cleaned” version from which all of the struck-out and red-lined text has been removed. Industry’s August 2000 revision of Chapter 11 has reduced the size of this chapter by 25% (48 to 36 pages in length – a meaningful start, but further consolidation should be undertaken).

Some general concerns with the July 2000 NRC revision of Chapter 11:

Length and Redundancy: the treatment of management measures remains far too detailed and contains much redundant and duplicated text – a relict of inputs from different authors? Chapter 11 is the most lengthy SRP chapter – suggesting, for example, that management measures is more important than nuclear criticality safety (SRP Ch. 5) or fire safety (SRP Ch. 7). The ‘Areas of Review’ and ‘Acceptance Criteria’ are highly repetitive; the former should be significantly shortened to identify only what broad areas a licensee must have to address. The ‘Acceptance Criteria’ will provide specific detailed guidance to the reviewer to ensure that each ‘Area of Review’ has been adequately addressed in the application.

Role of ‘Review Procedures’: §11.5 provides yet another venue to repeat, albeit on a more abbreviated basis, the same material presented in §11.3. This section should address procedures – that is, how to do the review – and indicate, for example, what individuals should do the review, when site visits and inspection of the ISA may be needed, how to examine cross-referenced material, etc. The current §11.5 just recasts the Acceptance Criteria.

Consistency: there is little consistency amongst individual sub-parts of the chapter. For example, in §11.5 (‘Review Procedures’) treatment of CM requires 2 pages, while every other maintenance measure requires a few brief paragraphs (which themselves are too long). Does this reflect the greater importance of CM?

Technical Edits: the SRP continues to reference the ‘failure log’ for IROFS and management measures. This was eliminated in June 2000 – one month before the current revision was issued. Similarly, continued reference to 15 SRP chapters is made (analogous to the MOX SRP). Industry strongly supports evaluation of risks at Part 70 facilities, and there are many sections in Ch. 11 where such terminology is appropriately used. However, at the July 2000 Public Meeting on the SRP, the staff stated such usage was inappropriate and that accidents should only be expressed and ranked in terms of ‘consequences’. If this is correct, many references to ‘risk’ should be corrected throughout Ch. 11.

Appendix C: NRC has indicated that current licenses meet '50-80%' of the requirements of the revised Part 70 and volunteered to prepare an example of how current licensee treatment of a management measure could be improved to meet the new Part 70 standard. Appendix C was prepared, but does not meet this expectation. If it remains in its current form, industry would suggest deleting Appendix C from Ch. 11. We include in our comments a proposed replacement for Appendix C that is based on current licensee treatment of 'Maintenance' and that incorporates new information required by the revised Part 70. (Industry recommends that Appendix C be expanded to include sample submissions that industry has prepared for the other Management Measures.)

Industry Practice : Specific comments address discrepancies between actual industry practices and NRC-presumed industry practices in Ch. 11. These discrepancies must be resolved.

QA Treatment: In the July revision of Ch. 11, a license applicant may now address QA as part of each management measure rather than as a separate management measure. This is an excellent improvement and reflects current industry practice. We should encourage the NRC to treat QA as an "umbrella" management measure that is an integral component of all other management measures and that need not be separately treated in Ch. 11. Industry recommends, therefore that §§11.3.8, 11.4.3.8, 11.5.2.8 and 11.6.8 be deleted and that the license applicant simply state that QA is addressed in each Management Measure.

Design Reconstitution: there would appear to be no need for sections on design reconstitution (e.g. §11.5.2.1(6)). The NRC should not be concerned with how the design bases were updated – but rather that they are current and were used appropriately to base the ISA on. The NRC reviewers may visit the site to examine the facility data that were incorporated into the ISA (or on which the ISA's conclusions were based), and to check that such data accurately reflect the configuration of the plant. Verifying the accuracy of plant drawings with the plant configuration is an action that can be confirmed through inspection.

Prescriptiveness: Ch. 11 remains highly prescriptive in the amount of detailed information the NRC expects to be included in the license application. Industry again recommends that only sufficient information be solicited that allows the principal elements of a management measure to be understood, but that the details and supporting information be kept at the facility for inspection or consultation. A reviewer should assess the applicant's commitments to, and description of, the core elements of a management measure – without being burdened by cumbersome and voluminous supporting details (procedures, policies, etc.). Let the facility inspectors address detailed program components.