

June 5, 1997

MEMORANDUM TO: L. Joseph Callan  
Executive Director for Operations

FROM: John C. Hoyle, Secretary /s/

SUBJECT: STAFF REQUIREMENTS - SECY-97-077 - DRAFT  
REGULATORY GUIDES, STANDARD REVIEW PLANS AND  
NUREG DOCUMENT IN SUPPORT OF RISK INFORMED  
REGULATION FOR POWER REACTORS

The Commission has approved publication of the draft regulatory guides, standard review plans and NUREG document for a 90-day public comment period.

(EDO) (SECY Suspense: 6/13/97)

The staff should provide the Commission information on its plans for conducting public workshops. The public workshop(s) to be conducted during the public comment period should be of sufficient duration and depth to provide meaningful insights into the approaches described in the documents.

In addition, the staff should provide the Commission information on its plans for training the NRC staff 1) on the risk-informed regulatory approach(es) contained in the regulatory guidance and standard review plan documents and 2) in overall PRA methods and techniques. Particular attention should be given to increasing basic user-level knowledge of PRA methods at the regional level.

(EDO) (SECY Suspense: 9/30/97)

The staff should continue to evaluate the proposed decision criteria and the methods of ensuring conformance to the criteria. The staff should also develop guidance on how to confirm the assumptions and analyses used to justify current licensing basis changes.

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SECY NOTE: THIS SRM, SECY-97-077, AND THE COMMISSION VOTING RECORD CONTAINING THE VOTE SHEETS OF ALL COMMISSIONERS WILL BE MADE PUBLICLY AVAILABLE 5 WORKING DAYS FROM THE DATE OF THIS SRM.

In particular, the staff should explore the following areas to add clarity and consistency to the process.

1. The feasibility of assigning assurance levels for conformance to decision criteria.
2. The use of point values for comparisons with decision criteria, without any explicit consideration of uncertainty (i.e., how consideration of uncertainty should be explicitly considered in conjunction with using point values -- for example, use of probability limits).
3. The implications of small increases in core damage frequency (CDF) and large early release frequency (LERF) codified in the guidance documents, as a function of the uncertainty associated with the PRA results.
4. Codifying in the guidance documents the experience gained from the pilots to provide additional guidance on the "increased management attention" process when proposed changes approach the guidelines.
5. Clarifying the distinction between risk-informed and risk-informed, performance-based regulatory approaches.

The staff should continue to pursue the long range goal of improving the overall quality and consistency of PRAs performed by different licensees by promoting high quality standards.

The staff should continue its efforts to complete, in a timely manner, the pilot applications of risk-informed regulation, and to complete the draft regulatory guidance and standard review plan for inservice inspection.

cc: Chairman Jackson  
Commissioner Rogers  
Commissioner Dicus  
Commissioner Diaz  
Commissioner McGaffigan  
OGC  
CIO  
CFO  
OCA  
OIG  
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)  
PDR  
DCS