

May 30, 1997

MEMORANDUM TO: L. Joseph Callan  
Executive Director for Operations

FROM: John C. Hoyle, Secretary /s/

SUBJECT: STAFF REQUIREMENTS - MEETING WITH BOILING  
WATER REACTOR VESSEL AND INTERNALS PROJECT  
(BWRVIP) AND NRC STAFF, 3:00 P.M., MONDAY,  
MAY 12, 1997, COMMISSIONERS' CONFERENCE ROOM,  
ONE WHITE FLINT NORTH, ROCKVILLE, MARYLAND  
(OPEN TO PUBLIC ATTENDANCE)  
and  
SECY-97-088 - NRC STAFF'S POSITION ON  
AUGMENTED EXAMINATION REQUIREMENTS FOR  
BOILING WATER REACTOR PRESSURE VESSELS  
PURSUANT TO 10 CFR 50.55a(g)(6)(ii)(A)

The Commission was briefed by representatives from the BWRVIP and the NRC staff on the issues related to the requirements for a full inspection of reactor pressure vessel welds.

The Commission disapproved issuance of the proposed letter (attached to SECY-97-088) to the BWRVIP at this time. The staff should complete the safety evaluation report (SER) on the BWRVIP proposed alternative to the reactor pressure vessel inspection requirements on an expedited basis. The SER will serve as the staff's documented and defensible bases for determining the acceptability of the BWRVIP proposed alternative. The staff should consider a tiered approach in gathering additional baseline information and/or implementing the rule. The SER should address the BWRVIP proposal to examine 100% of the longitudinal welds which would include examinations of some circumferential weld lengths near the intersections of the weld types to determine if this proposal could provide an appropriate level of sampling of the circumferential welds. In addition, the SER should provide a comprehensive evaluation of the probabilistic analysis contained in the BWRVIP proposed alternative. The SER should receive appropriate internal review, including review by the Advisory Committee on Reactor Safeguards (ACRS). The staff should promptly document any policy issues requiring Commission consideration, and provide a discussion of the options for resolving these issues, as appropriate.

(EDO)

(SECY Suspense: 7/25/97)

The staff should continue to be receptive to evaluating risk-informed regulatory approaches that enhance safety decision-making, reduce unnecessary burden or improve staff efficiency. In this regard, the Commission does not agree with the staff's conclusion that its rejection of the BWRVIP's probabilistic arguments is consistent with the Commission's PRA Policy Statement. Probabilistic arguments should be considered, properly evaluated, and used to appropriately complement the NRC's traditional engineering analyses. In this case, probabilistic arguments can, and should, be appropriately considered in determining the acceptability of a proposed technical alternative and/or in pursuing changes to the rule.

For the longer term, in response to the petition for rulemaking by the BWRVIP, the staff should take into consideration the technical merits from the results of the ASME Code Committee's effort, as well as the results from licensees' reactor vessel weld inspections.

cc: Chairman Jackson  
Commissioner Rogers  
Commissioner Dicus  
Commissioner Diaz  
Commissioner McGaffigan  
OGC  
CFO  
CIO  
OCA  
OIG  
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)  
PDR - Advance  
DCS - P1-17