

October 2, 1997

MEMORANDUM TO: L. Joseph Callan  
Executive Director for Operations

FROM: John C. Hoyle, Secretary /s/

SUBJECT: STAFF REQUIREMENTS - SECY-97-205 -  
INTEGRATION AND EVALUATION OF RESULTS FROM  
RECENT LESSONS-LEARNED REVIEWS

This is to advise you that the Commission has not objected to issuance of the revision to GL 91-18 subject to the following edits:

- 1) In Section 4.8, on page 8, the first two sentences under "Change to Facility or Procedures" should be revised to read: "The first circumstance is if the licensee plans for its final resolution of the degraded or nonconforming condition to include other change(s) to the facility or procedures in order to cope with the (uncorrected, including only partially corrected) nonconforming condition. Rather than fully correcting the nonconforming condition, the licensee decides to restore capability or margin by another change." (changes underlined)
- 2) Revise the last page of the attached flow chart, "Resolution of Degraded and Nonconforming Conditions," as follows:
  - Move the "Long-term Follow-up" heading one column to the right. This change is to reflect that the scheduling of corrective action, the performance of the 50.59, and the determination if NRC approval is needed are not long-term actions.
  - Change the first box in the second column to read, "Schedule corrective action for first available opportunity."
  - Delete the "Yes" label on the arrow leading to the "Implement corrective action" box.
  - Delete the flow path leading to the "Enforcement Action" box and the box itself.

---

SECY NOTE: THIS SRM AND SECY-97-205 WILL BE MADE PUBLICLY AVAILABLE 5 WORKING DAYS FROM THE DATE OF THIS SRM.

(The above three changes are to reflect that the NRC can take enforcement action for inadequate licensee performance at other steps in the process besides simply the failure to schedule prompt corrective action.)

- Add an asterisk in the "Schedule corrective action for the first available opportunity" box and, at the bottom of the chart, "\*See Section 4.3". This Section makes it clear that enforcement action can be taken for the failure to schedule prompt corrective action.

The remainder of the issues in this paper will be addressed by notation vote of the Commission and will be the subject of a subsequent SRM.

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