

October 25, 2000

Dr. Dana A. Powers  
Chairman  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: ACRS LETTER DATED SEPTEMBER 13, 2000, "PROPOSED RISK-  
INFORMED REVISIONS TO 10 CFR 50.44, 'STANDARDS FOR COMBUSTIBLE  
GAS CONTROL SYSTEM IN LIGHT-WATER-COOLED POWER REACTORS'"

Dear Dr. Powers:

The subject letter to Chairman Meserve discussed the staff's proposed modifications to 10CFR 50.44 to make it more risk-informed. Your letter provided conclusions and two recommendations. We agree with the conclusions. The recommendations, and the staff's responses, are:

ACRS Recommendation 1: The work, to date, provides sufficient basis for the development of a risk-informed 10 CFR 50.44 that can provide both a safety benefit and a reduction in unnecessary burden. We recommend that the staff be directed to proceed with rulemaking.

Staff Response: In SECY-00-0198, the staff describes its study to establish the technical feasibility of risk-informed changes to 10 CFR 50.44. The staff considered the results of the study to be sufficient to establish feasibility, and thus recommended that rulemaking (with the supporting regulatory analysis and more detailed technical analysis) be undertaken to develop a risk-informed alternative to 10 CFR 50.44. This recommendation is for the Commission to decide upon, and is now under its consideration.

ACRS Recommendation 2: Because the study of 10 CFR 50.44 is intended to be illustrative of a general approach, the discussion of how risk information was used to develop the results on the conditional large release probabilities should be expanded.

Staff Response: We agree. If the Commission approves proceeding with rulemaking to develop a risk-informed alternative to 10 CFR 50.44, we will include the recommended information in the supporting regulatory analysis. In addition, we will use this recommendation to improve future descriptions of risk-informed regulatory changes being considered by the staff.

The staff will continue to brief, as well as solicit the opinion of, the ACRS on its work to risk-inform 10 CFR 50.44 and other parts of 10 CFR 50.

Sincerely,

**/RA/**

William D. Travers  
Executive Director  
for Operations

cc: Chairman Meserve  
Commissioner Dicus  
Commissioner Diaz  
Commissioner McGaffigan  
Commissioner Merrifield  
SECY

NAME: g:\ACRS-50-44.wpd

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RES number 2000211, EDO Number 2000440

\* Previously concurred.

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# PARALLEL CONCURRENCE

## ROUTING AND TRANSMITTAL SLIP

DATE:10/10/00

MEMORANDUM TO: Dana Powers

FROM: W. Travers

SUBJECT: RESPONSE TO ACRS LETTER DATED SEPTEMBER 13, 2000,  
 "PROPOSED RISK-INFORMED REVISIONS TO 10 CFR  
 50.44,'STANDARDS FOR COMBUSTIBLE GAS CONTROL SYSTEM  
 IN LIGHT-WATER-COOLED POWER REACTORS"

ORIGINATOR/SECRETARY: ROOM NO./BLDG: T10 C 24

Patty Nielsen PHONE NO.: 415-6189

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<u>SIGN AND/OR</u>	<u>CONCUR</u>	<u>DATE</u>
1. MDrouin	_____	<u>  /  /</u>
2. MCunningham	_____	<u>  /  /</u>
3. TKing	_____	<u>  /  /</u>
4. SCollins	_____	<u>  /  /</u>
5. AThadani	_____	<u>  /  /</u>
6. CPaperiello	_____	<u>  /  /</u>
7. WTravers	_____	<u>  /  /</u>

**DUE TO EDO 10/20/00**

ACTION:	CIRCULATED:	FOR YOUR INFO:
APPROVAL:	COMMENT:	SEE ME:
AS REQUESTED:	NOTE & RETURN:	PREPARE REPLY:
COORDINATION:	PER CONVERSATION:	

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