

December 11, 2000

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

SUBJECT: PROPOSED FRAMEWORK FOR RISK-INFORMED CHANGES TO THE
TECHNICAL REQUIREMENTS OF 10 CFR PART 50

Dear Dr. Powers:

Your letter of November 20, 2000, discussed the staff's recent work on the above subject Framework. This Framework document provides guidelines to the staff for identification and development of risk-informed changes to the technical requirements of 10 CFR Part 50 and is described in SECY-00-0198. Your letter provided several observations and recommendations on the staff's work. We agree with the Committee's observations and recommendations. Specifically, with regard to recommendations we intend to proceed as follows:

ACRS Recommendation 1: We recommend that the tactics for implementing defense in depth be clarified. Will defense in depth be applied at all levels of the framework? Will it be invoked at lower tiers when it has already been applied to the top tiers?

Staff Response: We agree that the tactics for implementing defense in depth need to be clarified. In the next revision of the framework, the discussion will be expanded and will succinctly describe where and how the tactics are employed in regard to defense in depth.

ACRS Recommendation 2: For uncertainties that are included in the PRA, the rationalist approach should be followed (i.e., appropriate safety margins and redundancy, and diversity would be developed by quantitative analyses). Even though the framework is consistent with this approach, an expanded discussion of these issues would be beneficial.

Staff Response: We agree and in the next revision of the framework, the discussion will be expanded to describe how the issues (e.g., safety margins) are treated.

ACRS Recommendation 3: The treatment of events (e.g., earthquakes) that affect more than one cornerstone extensively should be discussed.

Staff Response: We agree and in the next revision of the framework, the discussion will be expanded to describe how these types of events are treated.

The staff will continue to interact with the ACRS on these issues as progress is made in the application of the framework to developing risk-informed alternative regulations.

Sincerely,

/RA/

William D. Travers
Executive Director
for Operations

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

NAME: g:\letter to ACRSon framework dec 00.wpd

Distribution: DRAA Chron, Drouin, Drouin r/f, Cunningham, King, Federline, Thadani, Summerour, ACRS File, Miraglia, Norry, J. Craig, Burns, Cyr, Schoenfeld, Collins, Paperiello, Travers

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* Previously concurred.

OFFICE	PRAB/DRAA/RES		PRAB/DRAA/RES		DRAA/RES
NAME	*MDrouin		MCunningham mxd for		TKing
DATE	11/29/00		11/29/00		11/30/00
OFFICE	NRR		RES:D	DEDMRS	EDO
NAME	*SCollins bws for		*AThadani tlk for	CPaperiello	WTravers
DATE	12/3/00		11/30/00	12/8/00	11/11/00

PARALLEL CONCURRENCE

ROUTING AND TRANSMITTAL SLIP

DATE: 11/29/00

MEMORANDUM TO: Dana Powers
FROM: W. Travers
SUBJECT: PROPOSED FRAMEWORK FOR RISK-INFORMED CHANGES TO THE TECHNICAL REQUIREMENTS OF 10 CFR PART 50
ORIGINATOR/SECRETARY: ROOM NO./BLDG: T10 C 24
Patty Nielsen PHONE NO.: 415-6189

SIGN AND/OR CONCUR DATE

1. MDrouin	_____	__/__/
2. MCunningham	_____	__/__/
3. TKing	_____	__/__/
4. SCollins	_____	__/__/
5. AThadani	_____	__/__/
6. CPaperiello	_____	__/__/
7. WTravers	_____	__/__/

DUE TO EDO 12/20/00

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