IN RESPONSE, PLEASE
REFER TO: M911118

December 12, 1991

MEMORANDUM FOR: James M. Taylor
Executive Director for Operations

FROM: Samuel J. Chilk, Secretary /S/

SUBJECT: STAFF REQUIREMENTS - BRIEFING ON STATUS OF DESIGN BASIS RECONSTITUTION (SECY-91-364), 10:00 A.M., MONDAY, NOVEMBER 18, 1991 COMMISSIONERS' CONFERENCE ROOM, ONE WHITE FLINT NORTH, ROCKVILLE, MARYLAND (OPEN TO PUBLIC ATTENDANCE)

The Commission was briefed by the NRC staff on the status of design basis reconstitution efforts by licensees and the related activities being conducted by the staff.

The Commission has concluded that there currently exists an adequate legal basis for requiring each licensee to have its design basis accessible. Nevertheless, in order to bring to some resolution a discussion which was begun during the briefing, the Commission requests that the staff consider whether there is a need for, or any practical utility in, further rulemaking, regulatory guidance, or a policy statement which would require, or urge, licensees to retain accurate design basis documentation, and which might set a date for completion of any licensee efforts to verify, and reconstruct as necessary, design basis documentation. Bearing in mind all the various, and sometimes competing, considerations raised during the preliminary discussion of such a course of action in the status briefing, the staff should examine the advantages and disadvantages, benefits and costs —— including the resource implications —— of such a course of action, consider whether additional requirements in this area would provide any safety-related benefits, and provide the Commission with a recommendation.
(EDO) (SECY Suspense: 3/20/92)

With regard to current agency inspection activities related to design basis document reconstitution, the staff should advise the Commission as to its inspection plans and activities that are directed toward verifying that all licensees have accessible design bases as required by existing regulations. In particular, the staff should —— (i) outline its inspection and review plans, (ii) describe the attributes of the designs and the methods of inspection and/or review that the staff intends to rely upon to

verify that licensees have accessible design bases, and (iii) provide the staff's schedule for completing these inspections and review activities to verify that all licensees have accessible design bases as required by existing regulations. In addition, the staff should provide a list of enforcement actions taken in the past for licensees' failures to comply with current requirements on accessible design bases.
(EDO) (SECY Suspense: 3/20/92)

The Chairman requested that the staff identify which licensees are performing design basis reconstitution programs and which are not and why. In addition, the staff should obtain a general understanding of the breadth and scope of licensee design document reconstitution programs.
(EDO) (SECY Suspense: 3/20/92)

Commissioner Rogers requested further information on licensees which have neither pursued a design document reconstitution program nor opted to purchase the full set of design documents from the architect-engineer firm after the construction phase. He asked for staff recommendations in response to such instances.
(EDO) (SECY Suspense: 3/20/92)

cc: The Chairman
Commissioner Rogers
Commissioner Curtiss
Commissioner Remick
OGC
OCAA
OIG
ACRS
PDR - Advance
DCS - P1-24