

May 18, 2001

Dr. William D. Travers
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Dr. Travers:

SUBJECT: PROPOSED FINAL MANAGEMENT DIRECTIVE 6.4, "GENERIC ISSUE PROGRAM"

During the 482ND meeting of the Advisory Committee on Reactor Safeguards, May 10-11, 2001, we completed our review of the proposed final Management Directive 6.4, "Generic Issue Program." During our 480th meeting, March 1-3, 2001, we discussed this matter with representatives of the NRC staff. We had the benefit of the documents referenced.

Conclusion

The proposed Management Directive 6.4 and the associated handbook, modified as appropriate based on the results of the pilot study, should provide an effective way to implement the revised generic issue process.

Discussion

The Office of Nuclear Regulatory Research (RES) has established criteria and guidance for risk-informed technical screening of generic issues applicable to reactor and materials facilities. The technical screening is to evaluate the possible safety implications of generic issues in a disciplined, quantitative manner. This approach, which uses probabilistic risk assessment, is comprehensive and provides an improved basis for decisionmaking. The screening of generic issues uses risk insights related to changes in core damage frequency, large early release frequency, and the product of the frequency of an accident and the averted public dose (person-rem). We agree with this approach, particularly since all three of the above risk metrics are to be used in the decisionmaking process.

We reviewed the reevaluation of the generic issue process along with the proposed Management Directive 6.4, and the associated handbook to implement the revised generic issue process and made a number of recommendations in our letter of April 19, 1999. One of these recommendations was that the staff conduct a pilot study to evaluate the effectiveness of using the Management Directive for implementing the revised generic issue process.

The RES staff conducted a pilot study. The results were very informative and the staff gained significant insights related to implementation problems. As a result, the staff developed a number of recommendations on how to improve the generic issue process and its implementation. We agree with these recommendations.

Sincerely,

/RA/

George E. Apostolakis
Chairman

References:

1. Memorandum dated April 11, 2001, from Ashok C. Thadani, Director, Office of Nuclear Regulatory Research, to Directors of NRC Offices, Subject: Management Directive 6.4, "Generic Issue Program."
2. Letter dated April 19, 1999, from Dana A. Powers, ACRS Chairman, to William D. Travers, Executive Director for Operations, Subject: Reevaluation of Generic Safety Issue Process.