

June 29, 2001

MEMORANDUM TO: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield

FROM: William D. Travers */RA/*
Executive Director for Operations

SUBJECT: THIRD ANNUAL REVIEW OF REGULATORY GUIDE 1.174 AND
STANDARD REVIEW PLAN CHAPTER 19.0

In a Staff Requirements Memorandum (SRM) dated May 20, 1998, the Commission requested the staff to perform annual reviews of the subject Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and Standard Review Plan Chapter 19.0, "Use of Probabilistic Risk Assessment in Plant-Specific, Risk-Informed Decisionmaking: General Guidance," and "incorporate experience gained from risk-informed pilot programs when revisions are necessary." Results of the first and second annual reviews were provided to the Commission in memoranda dated June 30, 1999, and July 3, 2000, respectively. This memorandum provides the third annual review.

The two previous memoranda identified six topics that the staff expected to include in the first revision. Those topics were:

- 1) Endorsement of the American Society of Mechanical Engineers (ASME) standard on PRA.
- 2) Guidelines for shutdown analysis (now expected to be addressed via possible endorsement of an American Nuclear Society (ANS) standard that is under development).
- 3) Incorporation of the seismic margin method (now expected to be addressed via possible endorsement of an ANS standard that was recently the subject of public comment).
- 4) Clarification of limitations on the use of the guidance with respect to burnup levels, power levels, and use of mixed-oxide fuels.

- 5) New guidance on the use of risk information in license amendment applications that do not initially include sufficient risk information. This issue was discussed in SECY-99-246, "Proposed Guidelines for Applying Risk-Informed Decisionmaking in License Amendment Reviews," dated October 12, 1999, and the associated SRM dated January 5, 2000.
- 6) Additional guidance on how the staff uses PRA information and the needed attributes of PRAs. This issue was discussed in SECY-00-162, "Addressing PRA Quality in Risk-Informed Activities," dated July 28, 2000, and the associated SRM dated October 27, 2000.

Since the completion of the second memorandum, no new topics have been identified for incorporation into this update to the guide and SRP chapter. However, due to the large number of one-time or temporary changes being submitted by licensees, the staff is considering the development of a temporary risk change guideline. If the staff decides to proceed in this area, temporary change guidelines will be incorporated into a future revision to the guide and SRP chapter to supplement the permanent change guidelines contained in these documents.

Inclusion of items 1, 2, and 3 into revisions of the guide and SRP chapter are contingent on the completion of the ASME and ANS standards activities, which have not yet been completed. The status of these efforts is as follows:

- ASME standard The staff has continued to participate on the ASME standard writing group to develop a revised version of the standard, which covers internally initiated accidents. It appears that this latest revision will reflect the substance of the staff's comments on the previous version published for comment. The revision is now expected to be published for public comment in late June 2001; the final version of the standard is expected by the end of this year.
- ANS standard (external hazards) The staff has participated on the ANS standard writing group. The draft standard was released for public comment in January 2001. NRC comments were provided to the ANS via a letter in May 2001. The completion date for this standard is now under review by ANS. Issuance of the ANS standard is contingent on finalization of the ASME standard, so its completion is expected to be no earlier than the end of this year.
- ANS standard (low power and shutdown risk analysis) It is the staff's understanding that ANS is revising its schedule for this work due to the funding process for work that will support the project. It appears that a draft for comment will be issued in late 2001 or 2002, with the final standard expected in late 2002 or 2003. This standard is also contingent on finalization of the ASME PRA standard.

The staff has developed proposed revisions to both Regulatory Guide 1.174 and SRP Chapter 19 that reflect items 4, 5, and 6 above. These revisions are being published for public review and comment, with the notification of availability and request for comment to be provided in the

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Federal Register in late June or early July 2001. The public comment period will end in late August or early September 2001. The staff expects to complete its review of comments, make any needed changes, brief the Advisory Committee on Reactor Safeguards and the Committee to Review Generic Requirements, and provide the Commission with recommended final versions of the documents by December 31, 2001.

cc: SECY
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