

From: Steven Long *NRR*
To: Michael Johnson *NRR*
Date: 6/20/01 7:44AM
Subject: 4th try at Q1 Response

Mike,

The attached file contains the rewritten paragraph that I promised in our meeting, yesterday afternoon. Please read it in the context of what precedes it in the response to Q1.

I think it objectively reflects the proper response to the question for our current stage of development of the ROP. I do not think that it would be seen as "indicting the Action Matrix." The question raises a real complexity to which the Action Matrix must be applied in some manner. That is unavoidable. Our response needs to address that.

Let me know what you think. I'm open to word-smithing for clarification purposes.

Steve

J/76

However, the issue raised by this question might be more important for other cases where the individually-evaluated risk estimates for the separate findings are not so significant. For example, in some circumstances, the combined risk of two "white" findings or a "white" and a "yellow" finding could exceed the threshold for "red" significance. That would be an important consideration for determining our regulatory response. With that in mind, the written SDP procedures have been revised to make it clear that it is our intent to consider the combined risk effects of concurrent conditions. The use of this combined risk estimate in the ROP Action Matrix is not necessarily a simple process. The combined risk estimate cannot be assigned to more than one of the findings without over-counting the total risk of the situation. In some cases, it may be appropriate to combine the findings into one and assign it the significance of the total risk. In other cases, it might be more appropriate to apportion the total risk among the separate findings on the basis of their relative importance to the total (using their Fussell-Vesely importance measures). For the present, our intent is to consider the various possible alternatives for each case and select the one that, in our judgement, is most representative of the risk implications for each specific case. In making that judgement, we will be mindful of any differences in regulatory actions that may be specified by the ROP Action Matrix for the various possible combinations of the numbers and associated colors of the findings.