

Why 10 CFR 50.55a should be within the scope of 10 CFR 50.69

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Overview

- Background
- Regulatory Consistency
- Safety Issues
- Regulatory Burden
- Conclusions



Background

- A purpose of 10 CFR 50.69/Option 2 is to remove SSCs of low safety significance from the scope of NRC special treatment requirements
- 10 CFR 50.55a is a special treatment requirement
- Code cases are independent of 50.69
 - e.g., risk-informed ISI/IST were Option 1

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Regulatory Consistency

- 10 CFR 50.69 will specify treatment requirements for RISC-3 SSCs
- NRC RILP decision not to review/endorse treatment guidance for RISC-3 SSCs
- Inconsistent to impose “how to” code requirements through 10 CFR 50.55a on RISC-3 SSCs

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Safety Issues

- What safety issues are addressed by imposing code requirements through 10 CFR 50.55a on RISC-3 SSCs?



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Regulatory Burden

- 10 CFR 50.55a imposed burden
 - NRC staff and licensee interpretations of rule and regulatory guidance
 - Preparation and review of regulatory reports and relief requests
 - Documentation, inspection and compliance
- Gore Report – Reinventing Government
 - Regulation = 10 to 15% increased overhead
(*ed. – this is probably low for nuclear*)



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Cost Comparison (\$000)

Safety-Related v. Dedicated v. NonSafety-Related

<u>Item</u>	<u>Safety-Related</u>	<u>Dedicated</u>	<u>NonSafety-Related</u>
Relief Valve 1 ½" x 2"	11	4.4	3.6
Operator (Valve)	30	15	9.9
Gate Valve 3" SS	7	.8	.13
Butterfly Valve 36"	36	13	9.5
Operator (large bore)	70	23	18
Check Valve	3.2	1	.32
Ball Valve 2"	3.5	1	.56
Gate Valve 6"	15	2.6	.6
Butterfly Valve 20"	30	7	5



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Conclusions

- Inclusion of 50.55a is critical to the viability of Option 2
- 50.55a burden on RISC-3 SSCs is unnecessary for licensees and NRC
- 50.69 treatment requirements are sufficient for regulatory assurance



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