July 30, 2002

MEMORANDUM TO: Christopher Grimes, Program Director
Policy and Rulemaking Program
Division of Regulatory Improvement Programs, NRR

FROM: David T. Diec, Project Manager ***/RA/***
Policy and Rulemaking Section A
Policy and Rulemaking Program
Division of Regulatory Improvement Programs, NRR

SUBJECT: SUMMARY OF PUBLIC MEETING WITH NUCLEAR ENERGY INSTITUTE (NEI) TO DISCUSS STAFF COMMENTS ON DRAFT REVISION C TO NEI 00-04, "10 CFR 50.69 SSC CATEGORIZATION GUIDELINE"

On July 10, 2002, the staff met with NEI to discuss its preliminary review of Draft Revision C to NEI-00-04, "10 CFR 50.69 SSC Categorization Guideline." A list of meeting attendees is attached.

The staff opened the meeting indicating that information exchange with NEI would help the staff focus its effort to formulate and endorse, with exceptions and clarifications, the Draft Revision C of NEI-00-04 in Draft Regulatory Guide (DG) 1121, " Implementation of Structures, Systems and Components Categorization Process in Nuclear Power Plants." The staff indicated that a proposed rulemaking package that includes DG 1121 is to be delivered to the Advisory Committee on Reactor Safeguards (ACRS) in August 2002, in advance of a scheduled meeting with the Committee in September 2002.

A number of editorial comments and clarifications were discussed and resolved. The staff also discussed a number of technical areas in which it intends to supplement or clarify NEI 00-04 in DG 1121. These include:

- Justification for the use of the unreliability factor of 2 to 5 in performing risk sensitivity study and the potential linkage of the characterization to the corrective actions program
- Consideration of common cause failure importance in the categorization process
- Intended use of the defense-in-depth matrix
- Determination and consideration of the quality of analyses not covered by NRC's endorsed standards, such as external events and shutdown analyses
- Determination of safety significance from screening and margins-type analyses
- Determination of safety significance for systems that are not normally considered in quantitative risk calculations such as radwaste system, passive structures, and others.

NEI stated that it would decide how to address these issues after the proposed rulemaking package is published for public comments (scheduled submittal to the Commission in September 2002).

Attachment: List of Meeting Attendees

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Attachment: List of Meeting Attendees

Distribution:
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NRC/NEI RIP 50 Option 2 Meeting
NEI 00 -04, Draft Revision C, 10 CFR 50.69 SSC Categorization Guideline
List of Attendees

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