

August 22, 2002

Dr. George E. Apostolakis
Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: DRAFT FINAL REVISION 1 TO REGULATORY GUIDE 1.174 AND TO
CHAPTER 19 OF THE STANDARD REVIEW PLAN

Dear Dr. Apostolakis:

Your letter of July 23, 2002, discussed the Advisory Committee on Reactor Safeguards' (the Committee's) review of the draft Revision 1 to Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and to the Standard Review Plan (SRP), Chapter 19, "Use of Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific, Risk-Informed Decisionmaking: General Guidance." This letter discussed the Committee's recommendations:

1. Revision 1 to RG 1.174 and SRP Chapter 19 should not be issued until more substantive changes are made.
2. Both RG 1.174 and SRP Chapter 19 should emphasize that all sources of risk from internal and external initiators during low-power and shutdown (LPSD), as well as full-power, operations must be included in the risk assessment. If bounding estimates of the risk contribution from plant modes not rigorously analyzed are used, justification of the estimates should be provided.
3. RG 1.174 and SRP Chapter 19 should state that changes to the licensing basis will, in general, require probabilistic risk assessments (PRAs) that conform at least to Category 2 of the American Society of Mechanical Engineers (ASME) standard [and the comparable category of the future American Nuclear Society (ANS) standards for external events and LPSD operations] and a Grade 3 of the industry peer review process.

The staff does not agree with the Committee's first recommendation not to issue RG 1.174 and SRP Chapter 19 at this time. The changes in Revision 1 are improvements to these documents and, since these documents are being used in licensing actions, both staff and licensees would benefit from these changes. Further, the changes in Revision 1 are not related to the second and third recommendations the Committee proposes and would not impede their future resolution and implementation.

Regarding the Committee's second and third recommendations, these changes to RG 1.174 and SRP Chapter 19 would require detailed interaction with all stakeholders to determine their resolution and implementation. These recommendations, if implemented, should be addressed in a later revision to RG 1.174. The staff plans to meet with the Committee in the near term to discuss in detail their concerns to come to a common understanding on a path forward. The staff has arranged a subcommittee meeting on September 09, 2002, to begin this dialog.

Sincerely,

/RA/

William D. Travers
Executive Director
For Operations

cc: Commissioner Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield
SECY

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DOCUMENT NAME: G:Mary/ response to acrs on rg 1.1174-2002.wpd

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