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To: Collins, NRE
No Response Necessary

AUTHOR: Mario Bonaca

AFFILIATION: ACRS

ADDRESSEE: Nils Diaz

SUBJECT: Proposed criteria for the treatment of individual requirements in a regulatory analysis

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D.C. 20555-0001

July 17, 2003

The Honorable Nils J. Diaz
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: PROPOSED CRITERIA FOR THE TREATMENT OF INDIVIDUAL
REQUIREMENTS IN A REGULATORY ANALYSIS

Dear Chairman Diaz:

During the 504th meeting of the Advisory Committee on Reactor Safeguards, July 9-11, 2003, we discussed with representatives of the NRC staff proposed criteria for the treatment of individual requirements in a regulatory analysis. We had the benefit of the document referenced.

CONCLUSION

The proposed criteria are responsive to the Commission's Staff Requirements Memorandum (SRM) dated December 31, 2001.

DISCUSSION

In the SRM dated December 31, 2001, the Commission directed the staff to "... provide the Commission with recommendations for revising existing guidance in order to implement a disciplined, meaningful, and scrutable methodology for evaluating the value-impact of any new requirements that could be added by a risk-informed alternative rule." The concern is that aggregating or "bundling" different requirements in a single regulatory analysis could potentially mask the inclusion of an inappropriate individual requirement. To address this concern, the staff has developed proposed criteria for the treatment of individual requirements in a regulatory analysis. The staff plans to incorporate the final criteria into NUREG/BR-0058, "Regulatory Analysis Guidelines of the U. S. Nuclear Regulatory Commission." We believe the proposed criteria are appropriate and responsive to the Commission's direction.

Sincerely,

A handwritten signature in black ink, reading "Mario V. Bonaca", is written over a horizontal line.

Mario V. Bonaca
Chairman

Reference:

1. Federal Register, Volume 68, No. 75, dated April 18, 2003, pages 19162-19166,
Subject: Regulatory Analysis Guidelines: Proposed Criteria for the Treatment of
Individual Requirements in a Regulatory Analysis.