August 27, 2003

MEMORANDUM TO: Jack R. Strosnider, Deputy Director
Office of Nuclear Regulatory Research

FROM: Charles E. Ader, Chairman **/RA/**
Committee to Review Generic Requirements

SUBJECT: REQUEST TO WAIVE REVIEW OF PROPOSED REVISIONS TO
REGULATORY GUIDE 1.178, "AN APPROACH FOR PLANT-SPECIFIC
RISK-INFORMED DECISIONMAKING FOR INSERVICE PIPING," AND
THE ASSOCIATED STANDARD REVIEW PLAN CHAPTER 3.9.8.

This is in response to your memorandum, dated August 4, 2003 (ML032170401) requesting
CRGR to waive review of the Regulatory Guide 1.178 and Standard Review Plan 3.9.8. It is
noted that these documents were previously reviewed by CRGR before they were issued
for trial use (minutes from CRGR #308, July 17, 1997) and CRGR had no objection with the
understanding that the risk-informed decision process is voluntary. Also, the Regulatory Guide
stated concerning the draft, that, ". . . the regulatory guide issued for trial use did not establish
any final staff positions for purposes of the Backfit Rule, 10 CFR 50.109, and any changes to
the regulatory guide prior to staff adoption in final form would not be considered to be backfits
as defined in 10 CFR 50.109(a)(1)."

Furthermore, it is noted that the use of the proposed revision of the Regulatory Guide continues
to be voluntary. Accordingly, CRGR does not need to review this revision to Regulatory Guide
1.178 and Standard Review Plan Chapter 3.9.8.

cc:
M. Federline, NMSS   S. Newberry
B. Mallett, RII   M. Cunningham
J. Moore, OGC   J. Giitter
B. Sheron, NRR   A. Rubin
J. Strosnider, RES   B. Hardin

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OFFICE	CRGR		CRGR					
NAME	L. Cupidon		C. Ader					
DATE	08/27/03		08/27/03					

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