



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

April 28, 1982

MEMORANDUM FOR: ALL NRR EMPLOYEES

FROM: Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

SUBJECT: NRR OFFICE LETTER NO. 2, REVISION 2 - NUREG-0800 -  
STANDARD REVIEW PLAN FOR THE REVIEW OF SAFETY ANALYSIS  
REPORTS FOR NUCLEAR POWER PLANTS

This revision supersedes NRR Office Letter No. 2, Revision 1, and Supplement 1 to NRR Office Letter No. 2 dated November 23, 1981 and October 30, 1981, respectively. Revision 2 incorporates Enclosure 1, an updated assignment list of review responsibilities for primary and secondary review branches, Enclosure 2, a procedure for processing a revision to the Standard Review Plan, and information pertinent to final rule 10 CFR Part 50, §50.34(g).

NUREG-0800 (formerly NUREG-75/087), the July 1981 edition of the "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants" (SRP), has been published and distributed. This revision of the SRP is the product of the integrated efforts and results of all NRR branches in assuring that each SRP section is congruent with the requirements of current NRC regulations and conforms with current regulatory guides and previously approved staff requirements and positions.

NUREG-0800 has been distributed externally to contractors and consultants engaged in NRC casework in accordance with the requests made by division directors. Copies of the SRP are available to the nuclear industry and the general public through purchase from the National Technical Information Service. NRR internal distribution has been made by position title (rather than an individual name). Section leaders and above in all technical organizational elements have received a complete copy of the SRP through distribution from TIDC. Branch Chiefs in the Division of Licensing have received sufficient copies for distribution of a complete SRP to each Operating Reactors Project Manager and Licensing Project Manager. Requests for necessary changes to the distribution list for the complete SRP should be approved by a Division Director and transmitted to the Chief, Licensing Guidance Branch, DST. Those on the distribution list will receive copies of subsequent revisions as they are issued.

In addition, the Licensing Guidance Branch has distributed copies of individual sections of the SRP to technical review Branch Chiefs so that individual technical reviewers have available the individual sections pertinent to performing their assigned review responsibilities (Enclosure 1). Upon request, other SRP sections that a reviewer uses on a regular basis can be provided by LGB.

In recognition of the importance of the SRP to the staff, the nuclear industry, and the public in assuring that features that are essential to protect the public health and safety are included in a consistent and acceptable manner for all plants licensed, project managers and technical reviewers should use the Standard Review Plan in their reviews to assure that these goals are achieved. The SRP provides a well-defined base for performing safety reviews of applications to construct and operate nuclear facilities. The uniform implementation of design requirements, criteria and guidelines contained in the SRP by all NRR staff members should assure that the acceptable level of safety will be maintained during the licensing process. Staff reviewers should not decrease nor go beyond the scope and requirements of any specific SRP section. If a staff member believes that protection of public safety necessitates a requirement in excess of those defined in the SRP, the staff member should present the matter to management, prior to incorporating it in a review.

Your attention is called particularly to the Introduction section of the SRP. Every NRR staff member should carefully read and fully understand the Introduction. It describes the relationship of the SRP to the regulations and the regulatory guides, and indicates the manner in which the SRP will be utilized in the regulatory process. Since the SRP does not contain new review requirements, reviews are to be performed in a manner described in the Review Procedures section and address the aspects identified in the Areas of Review section of the SRP. Since the staff review is an audit of the licensee's analysis, the review may emphasize or delete particular aspects of an SRP section, as is appropriate for the application under review. These deletions or areas of increased emphasis are acceptable, provided that the reviewer has management approval and documents the scope and depth of the review in the SER. Starting with the SER for Clinton 1 (the first SER scheduled for 1982), each reviewer shall provide a brief description in the SER of the review actually performed by the NRC staff; licensees should not be asked for additional information to facilitate this staff requirement. Examples of acceptable variations from the SRP include deletions because of design similarities to a second unit recently reviewed, and increased emphasis as a result of new developments from operating experience, or unique design features not considered when the SRP was written. Reviews that are nearly complete or have been completed using earlier acceptance criteria or review methods should not be repeated nor should on-going reviews be delayed.

On March 10, 1982, the Commission approved a final rule 10 CFR Part 50, §50.34(g) - Documentation of Differences from the Standard Review Plan. This rule requires certain applicants, those applications docketed after May 17, 1982, to identify and describe all differences in design features, analytic techniques and procedural methods between those proposed for a facility and those given in the acceptance criteria of the Standard Review Plan. NUREG-0906 provides guidance for implementing 10 CFR 50.34(g). After public comment, approval by the Commission and clearance by the Office of Management and Budget, all NRR staff reviewers will have to make an explicit evaluation finding in SERs to provide justification and appropriate bases for accepting the applicants' documented deviations.

The Standard Review Plan represents the most definitive basis available for specifying NRC's design criteria and design guidelines for an "acceptable level of safety" for light water reactor facility reviews. The Plan resulted from many years of experience gained by the staff in establishing and using regulatory requirements in the safety evaluations of nuclear facilities. This Plan is part of a continuing regulatory standards development activity that not only documents current methods of review, but also provides a base for an orderly modification of the review process in the future. It will be revised and updated periodically as the need arises to clarify the content or correct errors. In addition, proposals to modify the plans will be considered for matters of major safety significance. A major increase or decrease in safety requirements or scope of review for any SRP section will require approval by the Director of the Office of Nuclear Reactor Regulation. Prior to final approval by the Director, an SRP revision and an associated value-impact statement will be published as a "Proposed Revision to the Standard Review Plan" for public comments. The comment period permits the public to participate in the decision-making process before the SRP section is approved and issued in final form, and will encourage public input to the content of new requirements and to the value-impact statement associated with each new or revised section of the SRP. The procedure in Enclosure 2 will be used for processing a revision to the Standard Review Plan. Proposed changes to the SRP for clarification, to correct errors, to update references to new or revised regulations and regulatory guides, and proposals for substantive revisions to the plan should be transmitted to the Chief, Licensing Guidance Branch for processing in a timely manner.

Implementation of this approach with respect to the SRP use and revision procedure will add greater stability to the licensing process and increase confidence that requirements imposed by NRC are congruent with the regulations and are commensurate with the safety value to be expected. Your careful

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consideration of this memorandum and its consistent implementation should enable NRR to carry out its statutory function with full consideration of the public interest.



Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Enclosures:

1. Assignment of Review Responsibilities
2. Procedure for Processing a Revision to the Standard Review Plan

cc: WDircks, EDO  
BGrimes, IE  
GCunningham, ELD

ASSIGNMENT OF REVIEW RESPONSIBILITIES  
(PRIMARY AND SECONDARY BRANCHES)  
FOR THE JULY 1981 EDITION OF THE  
STANDARD REVIEW PLAN

SRP Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
1.8	1	All Review Branches	None
2.1.1	2	Siting Analysis Branch	None
2.1.2	2	Siting Analysis Branch	None
2.1.3	2	Siting Analysis Branch	Emergency Preparedness Licensing Branch
2.2.1 - 2.2.2	2	Siting Analysis Branch	None
2.2.3	2	Siting Analysis Branch	None
2.3.1	2	Accident Evaluation Branch	None
2.3.2	2	Accident Evaluation Branch	None
2.3.3	2	Accident Evaluation Branch	None
App. A to 2.3.3	2	Same	None
2.3.4	1	Accident Evaluation Branch	None
2.3.5	2	Accident Evaluation Branch	Effluent Treatment Systems Br. Radiological Assessment Branch
2.4.1	2	Hydrologic and Geotechnical Engineering Branch	None
App. A to 2.4.1	2	Same	None
2.4.2	2	Hydrologic and Geotechnical Engineering Branch	None

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SRP Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
2.4.3	2	Hydrologic and Geotechnical Engineering Branch	None
2.4.4	2	Hydrologic and Geotechnical Engineering Branch	None
2.4.5	2	Hydrologic and Geotechnical Engineering Branch	None
2.4.6	2	Hydrologic and Geotechnical Engineering Branch	Geosciences Branch
2.4.7	2	Hydrologic and Geotechnical Engineering Branch	None
2.4.8	2	Hydrologic and Geotechnical Engineering Branch	None
2.4.9	2	Hydrologic and Geotechnical Engineering Branch	None
2.4.10	2	Hydrologic and Geotechnical Engineering Branch	None
2.4.11	2	Hydrologic and Geotechnical Engineering Branch	None
2.4.12	2	Hydrologic and Geotechnical Engineering Branch	None
BTP HGEB-1	2	Same	None
2.4.13	2	Hydrologic and Geotechnical Engineering Branch	None
2.4.14	2	Hydrologic and Geotechnical Engineering Branch	None
2.5.1	2	Geosciences Branch	None

Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
2.5.2	1	Geosciences Branch	None
2.5.3	2	Geosciences Branch	None
2.5.4	2	Hydrologic and Geotechnical Engineering Branch	None
2.5.5	2	Hydrologic and Geotechnical Engineering Branch	None
3.2.1	1	Mechanical Engineering Br.	None
3.2.2	1	Mechanical Engineering Br.	None
App. A to 3.2.2	1	Same	None
App. B to 3.2.2	1	Same	None
App. C to 3.2.2	0	Same	None
App. D to 3.2.2	0	Same	None
3.3.1	2	Structural Engineering Br.	None
3.3.2	2	Structural Engineering Br.	None
3.4.1	2	Auxiliary Systems Branch	None
3.4.2	1	Structural Engineering Br.	None
3.5.1.1	2	Auxiliary Systems Branch	None
3.5.1.2	2	Auxiliary Systems Branch	None
5.1.3	2	Materials Engineering Br.	None

SRP Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
3.5.1.4	2	Auxiliary Systems Branch	None
*BTP ASB 3-2	2	Same	None
3.5.1.5	1	Siting Analysis Branch	None
3.5.1.6	1	Siting Analysis Branch	None
3.5.2	2	Auxiliary Systems Branch	None
3.5.3	1	Structural Engineering Br.	None
App. A to 3.5.3	0	Same	None
3.6.1	1	Auxiliary Systems Branch	None
BTP ASB 3-1	1	Same	None
3.6.2	1	Mechanical Engineering Br.	None
BTP MEB 3-1	1	Same	None
3.7.1	1	Structural Engineering Br.	None
3.7.2	1	Structural Engineering Br.	None
3.7.3	1	Structural Engineering Br.	None
3.7.4	1	Structural Engineering Br.	None
3.8.1	1	Structural Engineering Br.	None
App. to 3.8.1	0	Same	None

Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
3.8.2	1	Structural Engineering Branch	None
3.8.3	1	Structural Engineering Branch	None
3.8.4	1	Structural Engineering Branch	None
App. A to 3.8.4	0	Same	None
App. B to 3.8.4	0	Same	None
App. C to 3.8.4	0	Same	None
App. D to 3.8.4	0	Same	None
3.8.5	1	Structural Engineering Branch	None
3.9.1	2	Mechanical Engineering Branch	None
3.9.2	2	Mechanical Engineering Branch	None
3.9.3	1	Mechanical Engineering Branch	None
App. A to 3.9.3	0	Same	None
3.9.4	1	Mechanical Engineering Branch	None
3.9.5	2	Mechanical Engineering Branch	None
3.9.6	2	Mechanical Engineering Branch	None
3.10	2	Equipment Qualification Br.	None
3.11	2	Equipment Qualification Br.	None
4.2 & App. A	2	Core Performance Branch	None

RP Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
4.3	2	Core Performance Branch	None
BTP CPB 4.3-1	2	Same	None
4.4	1	Core Performance Branch	Human Factors Engineering Br. Instrumentation and Control Systems Branch. Procedures and Test Review Br.
App. to 4.4	1	Same	None
4.5.1	2	Materials Engineering Br.	None
4.5.2	2	Materials Engineering Br.	None
4.6	1	Auxiliary Systems Branch	None
5.2.1.1	2	Mechanical Engineering Br.	None
5.2.1.2	2	Mechanical Engineering Br.	None
5.2.2	1	Reactor Systems Branch	None
BTP RSB 5-2	0	Same	None
5.2.3	2	Materials Engineering Br.	Chemical Engineering Branch
*BTP MTEB 5-7	2	Same	None
5.2.4	1	Materials Engineering Br.	None
5.2.5	1	Auxiliary Systems Branch	None
5.3.1	1	Materials Engineering Br.	None

Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
5.3.2	1	Materials Engineering Br.	None
BTP MTEB 5-2	1	Same	None
5.3.3	1	Materials Engineering Br.	None
5.4	1	Review as assigned in the relevant cited sections of the SRP.	
5.4.1.1	1	Materials Engineering Br.	None
5.4.2.1	2	Materials Engineering Br.	Chemical Engineering Branch
BTP MTEB 5-3	2	Chemical Engineering Br.	Materials Engineering Br.
5.4.2.2	1	Materials Engineering Br.	None
5.4.6	2	Reactor Systems Branch	None
5.4.7	2	Reactor Systems Branch	None
BTP RSB 5-1	2	Same	None
5.4.8	2	Chemical Engineering Br.	None
5.4.11	2	Auxiliary Systems Branch	None
5.4.12	0	Reactor Systems Branch	None
6.1.1	2	Materials Engineering Br.	Chemical Engineering Branch
BTP MTEB 6-1	2	Chemical Engineering Br.	Materials Engineering Br.

RP Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
6.1.2	2	Chemical Engineering Branch	None
6.2.1	2	Containment Systems Branch	None
6.2.1.1.A	2	Containment Systems Branch	None
6.2.1.1.B	2	Containment Systems Branch	None
6.2.1.1.C	4	Containment Systems Branch	None
App. I to 6.2.1.1.C	1	Same	None
6.2.1.2	2	Containment Systems Branch	None
6.2.1.3	1	Containment Systems Branch	None
6.2.1.4	1	Containment System Branch	None
6.2.1.5	2	Containment Systems Branch	None
BTP CSB 6-1	2	Same	None
6.2.2	3	Containment Systems Branch	None
6.2.3	2	Containment Systems Branch	None
BTP CSB 6-3	2	Same	None
6.2.4	2	Containment Systems Branch	None
BTP CSB 6-4	2	Same	None
6.2.5	2	Containment Systems Branch	None

POP Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
App. A to 6.2.5	2	Same	None
*BTP CSB 6-2	2	Same	None
6.2.6	2	Containment Systems Branch	None
6.2.7	0	Materials Engineering Br.	None
6.3	1	Reactor Systems Branch	None
BTP RSB 6-1	1	Same	None
6.4	2	Accident Evaluation Branch	Effluent Treatment Systems Br. Siting Analysis Branch
App. A to 6.4	2	Same	None
6.5.1	2	Effluent Treatment Systems Branch	None
6.5.2	1	Accident Evaluation Branch	Chemical Engineering Branch
6.5.3	2	Accident Evaluation Branch	Effluent Treatment Systems Br.
6.5.4	2	Accident Evaluation Branch	None
6.6	1	Materials Engineering Br.	None
6.7	2	Auxiliary Systems Branch	None
7.1	2	Instrumentation and Control Systems Branch	None
App. A to 7.1	0	Same	None
App. B to 7.1	0	Same	None

SRP Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
7.2	2	Instrumentation and Control Systems Branch	None
7.3	2	Instrumentation and Control Systems Branch	None
7.4	2	Instrumentation and Control Systems Branch	None
7.5	2	Instrumentation and Control Systems Branch	None
7.6	2	Instrumentation and Control Systems Branch	None
7.7	2	Instrumentation and Control Systems Branch	None
Appendix 7-A	2	Instrumentation and Control Systems Branch	None
Appendix 7-B	1	Instrumentation and Control Systems Branch	None
8.1	2	Power Systems Branch	None
8.2	2	Power Systems Branch	None
8.3.1	2	Power Systems Branch	None
8.3.2	2	Power Systems Branch	None
Appendix 8-A	2	Power Systems Branch	None
Appendix 8-B	0	Power Systems Branch	None

Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
9.1.1	2	Auxiliary Systems Branch	None
9.1.2	3	Auxiliary Systems Branch	Chemical Engineering Branch
9.1.3	1	Auxiliary Systems Branch	Chemical Engineering Branch
9.1.4	2	Auxiliary Systems Branch	None
*BTP ASB 9-1	2	Same	
9.1.5	0	Auxiliary Systems Branch	None
9.2.1	2	Auxiliary Systems Branch	None
9.2.2	1	Auxiliary Systems Branch	None
9.2.3	2	Auxiliary Systems Branch	None
9.2.4	2	Auxiliary Systems Branch	None
9.2.5	2	Auxiliary Systems Branch	None
BTP ASB 9-2	2	Same	None
9.2.6	2	Auxiliary Systems Branch	None
9.3.1	1	Auxiliary Systems Branch	None
9.3.2	2	Chemical Engineering Branch	None
9.3.3	2	Auxiliary Systems Branch	None
9.3.4	2	Chemical Engineering Branch	None

SRP Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
9.3.5	2	Auxiliary Systems Branch	None
9.4.1	2	Auxiliary Systems Branch	None
9.4.2	2	Auxiliary Systems Branch	None
9.4.3	2	Auxiliary Systems Branch	None
9.4.4	2	Auxiliary Systems Branch	None
9.4.5	2	Auxiliary Systems Branch	None
9.5.1	3	Chemical Engineering Branch	None
BTP CMEB 9.5.1	2	Same	None
9.5.2	2	Power Systems Branch	None
9.5.3	2	Power Systems Branch	None
9.5.4	2	Power Systems Branch	None
9.5.5	2	Power Systems Branch	None
9.5.6	2	Power Systems Branch	None
9.5.7	2	Power Systems Branch	None
9.5.8	2	Power Systems Branch	None
10.2	2	Power Systems Branch	None
10.2.3	1	Materials Engineering Branch	None

Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
10.3	2	Auxiliary Systems Branch Power Systems Branch	None
10.3.6	2	Materials Engineering Branch	None
10.4.1	2	Power Systems Branch	None
10.4.2	2	Effluent Treatment Systems Branch	None
10.4.3	2	Effluent Treatment Systems Branch	None
10.4.4	2	Power Systems Branch	None
10.4.5	2	Auxiliary Systems Branch	None
10.4.6	2	Chemical Engineering Branch	None
10.4.7	2	Auxiliary Systems Branch	None
BTP ASB 10-2	2	Same	None
10.4.8	2	Chemical Engineering Branch	None
10.4.9	2	Auxiliary Systems Branch	None
BTP ASB 10-1	2	Same	None
11.1	2	Effluent Treatment Systems Branch	None
11.2	2	Effluent Treatment Systems Branch	Radiological Assessment Branch

RP Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
11.3	2	Effluent Treatment Systems Branch	Radiological Assessment Branch
BTP ETSB 11-5	0	Same	None
11.4	2	Effluent Treatment Systems Branch	None
BTP ETSB 11-3	2	Same	None
App. 11.4-A to 11.4	0	Same	None
11.5	3	Effluent Treatment Systems Branch Chemical Engineering Br.	None
App. 11.5-A to 11.5	1	Same	None
12.1	2	Radiological Assessment Br.	None
12.2	2	Radiological Assessment Br.	None
12.3-12.4	2	Radiological Assessment Br.	None
12.5	2	Radiological Assessment Br.	None
13.1.1	2	Licensee Qualifications Br.	None
13.1.2-13.1.3	2	Licensee Qualifications Br.	None
13.2.1	0	Operator Licensing Branch	None
13.2.2	0	Licensee Qualifications Br.	None

Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
13.3	2	Emergency Preparedness Licensing Branch	None
13.4	2	Licensee Qualifications Br.	None
13.5.1	0	Licensee Qualifications Br.	None
13.5.2	0	Procedures and Test Review Branch	None
13.6	2	Physical Security Licensing Branch	Standardization and Special Projects Branch
14.2	2	Procedures and Test Review Branch	None
15.0	2	Review as assigned in the relevant transient and accident sections of 15.0.	
15.1.1-15.1.4	1	Reactor Systems Branch	None
15.1.5	2	Reactor Systems Branch	Accident Evaluation Branch
App. to 15.1.5	2	Accident Evaluation Branch	Reactor Systems Branch
15.2.1-15.2.5	1	Reactor Systems Branch	None
15.2.6	1	Reactor Systems Branch	None
15.2.7	1	Reactor Systems Branch	None
15.2.8	1	Reactor Systems Branch	Accident Evaluation Branch
15.3.1-15.3.2	1	Reactor Systems Branch	None

SRP Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
15.3.3-15.3.4	2	Reactor Systems Branch	None
15.4.1	2	Core Performance Branch	None
15.4.2	2	Core Performance Branch	None
15.4.3	2	Core Performance Branch	None
15.4.4-15.4.5	1	Reactor Systems Branch	None
15.4.6	1	Reactor Systems Branch	None
15.4.7	1	Core Performance Branch	None
15.4.8	2	Core Performance Branch	Accident Evaluation Branch
App. to 15.4.8	1	Accident Evaluation Br.	Core Performance Branch
15.4.9	2	Core Performance Branch	Accident Evaluation Branch
App. to 15.4.9	2	Accident Evaluation Br.	Core Performance Branch
15.5.1-15.5.2	1	Reactor Systems Branch	None
15.6.1	1	Reactor Systems Branch	None
15.6.2	2	Accident Evaluation Branch	None
15.6.3	2	Accident Evaluation Branch	Reactor Systems Branch
15.6.4	2	Accident Evaluation Branch	Reactor Systems Branch
15.6.5	2	Reactor Systems Branch	Accident Evaluation Branch

Section/App./BTP	Rev. No.	Primary Review Responsibility	Secondary Review Responsibility
App. A to 15.6.5	1	Accident Evaluation Branch	Effluent Treatment Systems Br.
App. B to 15.6.5	1	Accident Evaluation Branch	Effluent Treatment Systems Br.
App. D to 15.6.5	1	Accident Evaluation Branch	None
15.7.3	2	Effluent Treatment Systems Branch	Hydrologic and Geotechnical Engineering Branch
15.7.4	1	Accident Evaluation Branch	Effluent Treatment Systems Br.
15.7.5	2	Accident Evaluation Branch	Effluent Treatment Systems Br.
15.8	1	Reactor Systems Branch	Procedure and Test Review Br. Instrumentation and Control Systems Branch
16.0	1	Licensing Guidance Branch	All Branches
17.1	2	Quality Assurance Branch	Mechanical Engineering Branch Instrumentation and Control Systems Branch Power Systems Branch Accident Evaluation Branch Radiological Assessment Branch Hydrologic and Geotechnical Engineering Branch Containment Systems Branch
17.2	2	Quality Assurance Branch	
18.0	0	Human Factor Engineering Br.	None

\*BTP has been superseded.

## PROCEDURE FOR PROCESSING A REVISION TO THE STANDARD REVIEW PLAN

The following is a description of the steps in the process for obtaining management approvals of revisions to the Standard Review Plan (SRP) in an orderly and timely manner in accordance with management directives, highlighting the required documentation, responsibilities, and interfaces between organizations.

Two step-by-step processes are described by which each of two different types of SRP revisions receive management approval from the time the change is identified until the revised SRP section is issued for use. The two types of SRP revisions are as follows:

Type I - Revisions to the SRP to Incorporate Previously Approved Requirements:

- (a) Revisions necessary to incorporate in the SRP new or revised requirements or guidance that have received public comment and have been approved by appropriate authority, including CRGR, EDO and Commission, where appropriate, for which additional public comments are not necessary (e.g., implementation or referencing in the SRP of Commission Policy Statements or instructions, Regulatory Guides, Standards, and resolution of Generic Issues including approved TMI Action Plan items).
- (b) Revisions necessary to incorporate in the SRP new positions that have been approved by the Director, NRR, and by CRGR and EDO as being so clearly needed that a public comment period would cause unacceptable delay in imposing them.

Since Type I revisions incorporate previously approved requirements which already have had CRGR review and EDO approval, NRR management has the responsibility for reviews and approvals of the necessary SRP revisions to incorporate them.

Type II - Proposed Revisions to the SRP for which Public Comments  
Are Necessary:

- (a) Revisions to incorporate proposed new or revised requirements, positions, or guidance that have not been reviewed and approved by appropriate authority through other processes, including proposed new sections of the SRP.

Type II revisions require CRGR review and public comments.

A. Procedure for Type I Changes

The steps for processing a Type I SRP revision (See Flow Chart, Figure 1) are as follows:

- (1) Once a new requirement is approved, LGB forwards appropriate material to the branch that has primary review responsibility with a request to initiate action. To the extent practicable, LGB will assist the primary review branch in preparing the revision package. LGB will maintain a tracking system for the change.
- (2) The primary review branch prepares the revised SRP section in the form of a markup of the previous versions along with a record of previous approval of the new requirements, coordinates the change with the secondary review branch(es), obtains the concurrences of line management of the primary and secondary review branch(es), obtains the concurrence of line management of the primary and secondary review branches up to the Division Director level, and transmits the completed revision package to LGB for processing and control.

If the change to the SRP would necessitate a change to the generic STS, a proposed revision to the STS should also be initiated (refer to NRR Office Letter No: 38).

- (3) LGB reviews the revision package for completeness and format and transmits it to Safety Program Evaluation Branch for review.
- (4) SPEB verifies that the change meets the criteria for a Type I revision, assures that the revision does not go beyond the scope of the approved requirements, resolves any comments with the primary branch and obtains concurrence of the DST Assistant Directors. DL is provided opportunity to concur or indicate dissenting views. SPEB then recommends approval or disapproval to the Director of DST. The revision package is returned to LGB along with the approval sheet.
- (5) LGB prepares the completed package for final typing. The draft revision is returned to the primary review branch.
- (6) The primary review branch (PRB) assures that SPEB comments have been resolved, sends the SRP revision markup to CRESS for final typing and proofs the final package. The PRB then transmits the completed package back to LGB for processing.
- (7) LGB assembles the final package, prepares a Federal Register Notice of issuance, and obtains review and approval of the Director, Division of Safety Technology, and the Director, NRR.
- (8) LGB sends the Federal Register Notice to the Division of Rules and Records for issuance.
- (9) LGB also sends the completed SRP revision to Division of Technical Information and Document Control for reproduction and distribution.
- (10) The SRP section is issued for use using the IX SRP Standard Distribution List after OMB approval, if necessary.

## B. Procedure for Type II Changes

The revision process for a Type II change to the SRP consists of two parts. The first covers the processing of a proposed revision package through issuance of the proposed revision for public comments (Figure 2). The second covers the review and disposition of the public comments and further processing of the revision package for approval, issuance, and use in the licensing process (Figure 3).

The Flow Path for the processing of a Type II SRP revision is similar to the Type I revision process up to and including the review and approval by DST (step 7) except for the following:

- (a) the revision package prepared is a proposed revision package to be issued for public comments;
- (b) the proposed revision package contains a value-impact risk assessment analysis prepared in accordance with the revised NRR Office Letter No. 16;
- (c) the review and approval performed by SPEB for a Type II change will include a more detailed review because of the new requirement(s) being incorporated in the SRP; and
- (d) the proposed revision package also contains the necessary background information required for the CRGR review.

The steps for processing a Type II SRP revision (See Flow Chart, Figures 2 and 3) are as follows:

- (1) The primary review branch initiates the proposed revision, prepares the necessary documentation, coordinates with the secondary review branch, obtains concurrence of line management of the primary and secondary review branches up to the Division Director level and transmits the proposed revision package to LGB for processing and control.

If the revision to the SRP would necessitate changes to the generic Standard Technical Specifications, the information required for changes to STS shall be prepared and shall accompany this package (Reference NRR Office Letter No. 38).

- (2) LGB reviews the revision package for completeness and transmits it to SPEB for review.
- (3) SPEB reviews the significance and need for any increase or decrease in safety requirements that will occur as a result of the proposed revision; reviews the value-impact and risk assessment analyses, obtaining input from RRAB as needed; resolves any comments with the primary review branch; obtains concurrences from DST Assistant Directors; and recommends approval or disapproval to the Director, DST. The revision package is returned to LGB along with the approval sheet.
- (4) LGB assures that all comments are resolved with the primary branch and prepares the draft proposed revision package for review and approval by Director, DST, concurrence of all other NRR Division Directors, and Director, NRR.
- (5) Director, NRR, transmits proposed revision package to CRGR for review.
- (6) The Division having primary reviewing responsibility will make necessary presentations to CRGR, with assistance from DST, including resolving any comments directed at NRR and, if required by CRGR, any nuclear industry input.
- (7) LGB prepares the package for typing. The draft proposed revision is returned to the primary review branch.
- (8) The primary review branch assures that all comments of SPEB, RRAB, and CRGR have been resolved and sends the proposed SRP section to CRESS for typing

and proofing. The PRB transmits the completed SRP mats back to LGB for processing.

- (9) LGB assembles the proposed revision package, prepares a Federal Register Notice of intent to revise a section of the SRP, and obtains review and approval of the Director, NRR.
- (10) LGB sends the Federal Register Notice to the Division of Rules and Records for issuance.
- (11) LGB also sends the proposed revision to the SRP to the Division of Technical Information and Document Control for reproduction and distribution for public comment.
- (12) The proposed SRP section is issued for comments (60 days). TIDC makes distribution to Standard Distribution List and provides copies to the public upon request.
- (13) LGB receives public comments for evaluation and distribution to the primary branch.
- (14) The primary review branch prepares the final revision package taking into account comments received. A listing of each substantive comment, and its disposition, shall be prepared as an enclosure to the package.
- (15) Steps 2 through 11 above are repeated to complete final revision processing through TIDC's reproduction and distribution.
- (16) The SRP section is issued for use using IX Standard Distribution List after OMB approval, if necessary.

Housekeeping Changes:

In addition to the Types I and II changes discussed above, there will be need for housekeeping changes, e.g., editorial corrections, changes in names of

organizational units, changes in branch assignments, deletions of unused references. These changes will normally not be cause, in themselves, for publication of SRP revisions but will be incorporated in Type I and II changes when prepared.

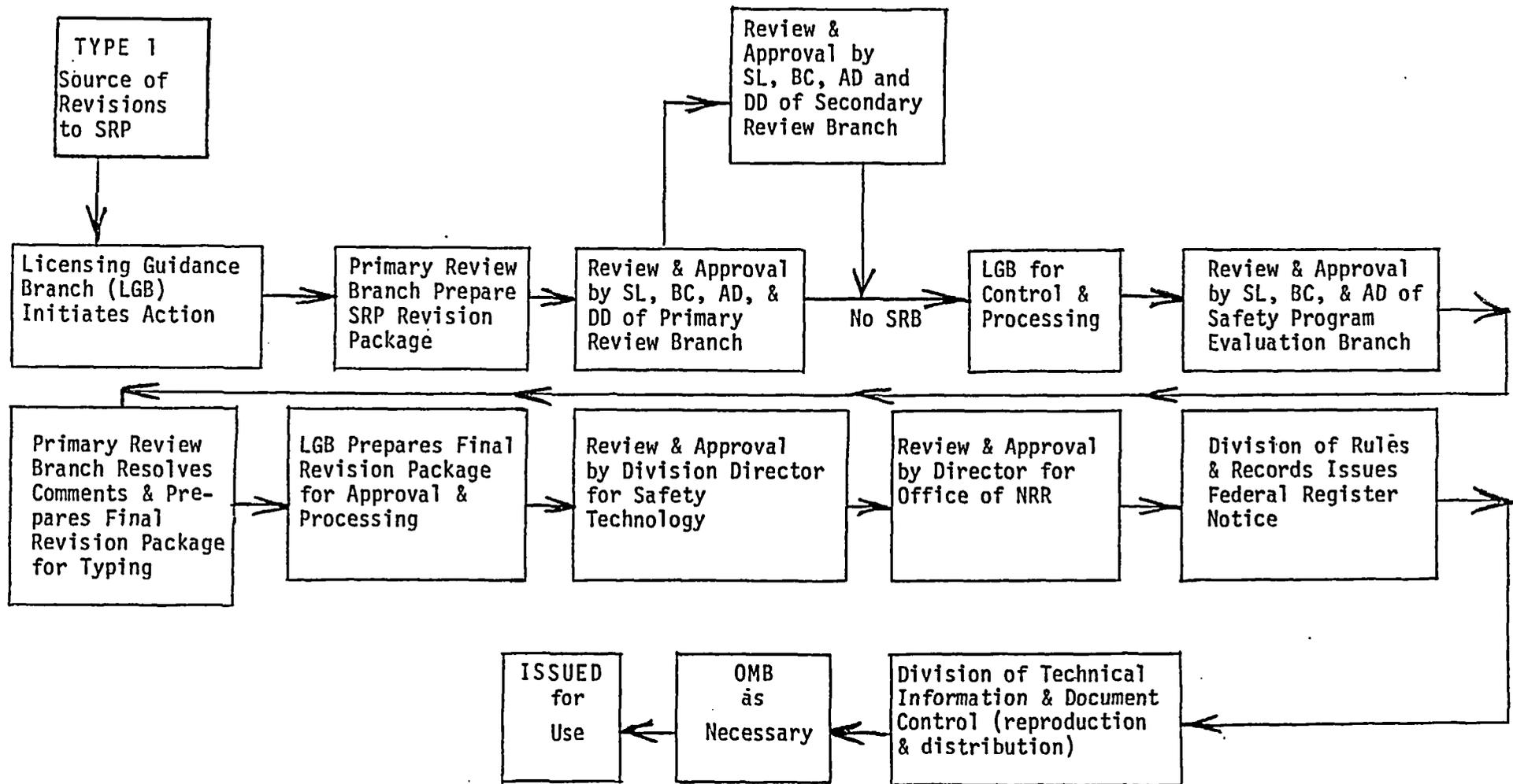


Figure 1. Flow Chart for Type 1 SRP Revisions

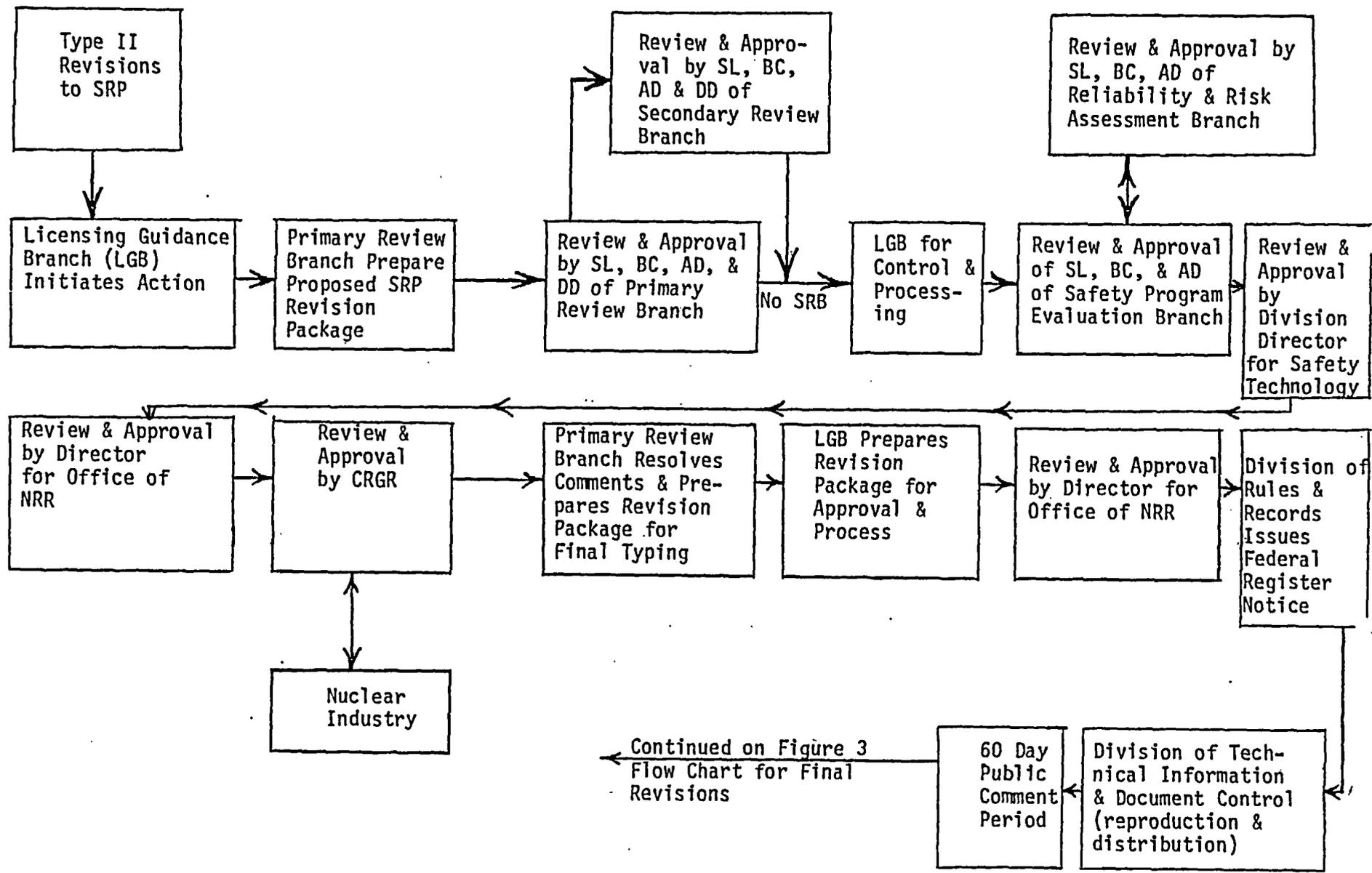


Figure 2 - Flow Chart for Type II Proposed Revisions thru Public Comment Period

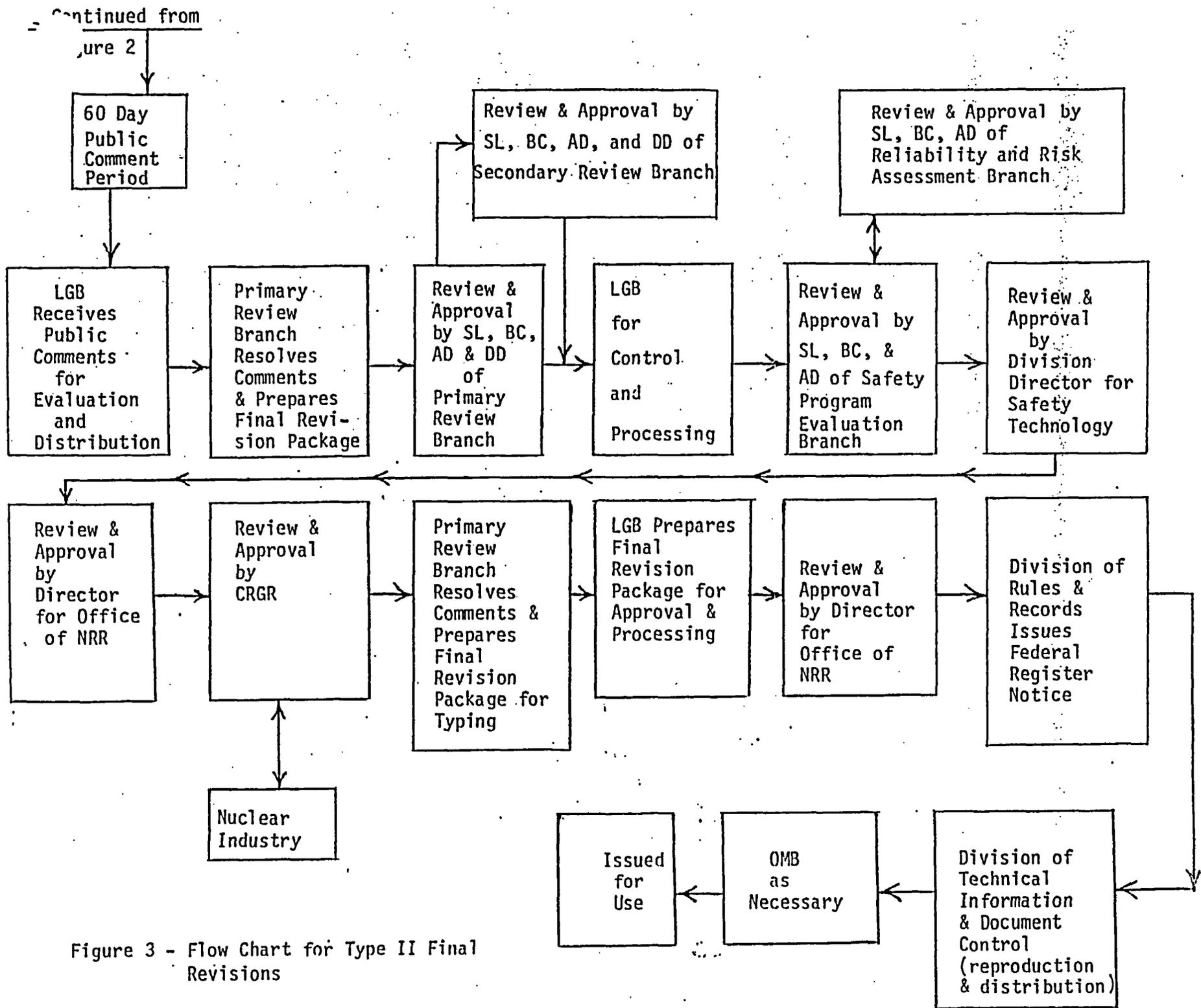


Figure 3 - Flow Chart for Type II Final Revisions