

December 1, 2005

MEMORANDUM TO: Sher Bahadur, Chairman
Committee to Review Generic Requirements

FROM: Jack R. Strosnider, Director \RA\
Office of Nuclear Material Safety
and Safeguards

SUBJECT: DRAFT NMSS POLICY AND PROCEDURES LETTER P&P 1-82,
10 CFR PART 70 BACKFIT GUIDANCE, REVISION 1

The Division of Fuel Cycle Safety and Safeguards has developed Nuclear Material Safety and Safeguards (NMSS) Policy and Procedures Letter (P&P) 1-82, "10 CFR Part 70 Backfit Guidance," for staff use in implementing the requirements of 10 CFR 70.76. This was completed per the Backfit Action Plan, dated November 17, 2003, approved by the Executive Director for Operations on December 19, 2003, that required the offices and the regions to present their backfit procedures for the Committee's endorsement. On March 31, 2004, the Committee to Review Generic Requirements (CRGR) approved issuance of P&P 1-82, Revision 0, for issuance to the staff.

On October 28, 2004, the U.S. Nuclear Regulatory Commission (NRC) issued the revised NRC Management Directive 8.4, "NRC Program for Management of Plant-Specific Backfitting of Nuclear Power Plants," that necessitated updates to P&P 1-82, Revision 0. The purpose of this draft revised NMSS P&P 1-82, Revision 1, is to provide guidance for implementing the backfit provisions in 10 CFR 70.76. We do not believe that any of the changes made to P&P 1-82, Revision 1, are more than editorial.

Therefore, we are providing the P&P 1-82, Revision 1, a redline-strikeout version, and requesting a waiver to the formal CRGR review. This is consistent with past practices and appears to be a more efficient use of our resources. Please inform me as soon as practical if this approach is acceptable to you.

Enclosures:

1. P&P 1-82, Revision 1
2. P&P1-82, document comparison of changes since Revision 0

CONTACT: Billy Gleaves, NMSS/FMS
301-415-5848

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