

October 31, 2006

MEMORANDUM TO: John T. Larkins, Executive Director  
Advisory Committee on Reactor Safeguards  
Advisory Committee on Nuclear Waste

FROM: Patrick L. Hiland, Director */RA/*  
Division of Engineering  
Office of Nuclear Reactor Regulation

SUBJECT: TRANSMITTAL OF PROPOSED REVISION TO STANDARD REVIEW  
PLAN NUREG-0800 SECTION 17.4, REV. 0 "RELIABILITY  
ASSURANCE PROGRAM"

The purpose of this memorandum is to transmit the proposed revision to NUREG-0800, Standard Review Plan (SRP), Section 17.4, Rev. 0, "Reliability Assurance Program (RAP)," to the ACRS for its consideration. This document is technically complete, reformatted in conformance with LIC-200, "Standard Review Plan Process," and is designated "publically available."

In accordance with the staff requirements memorandum dated May 10, 2005, on the April 6, 2005 Commission meeting, the Office of New Reactors (NRO) has developed SRP Section 17.4 (Enclosure).

The present revision updates the 1996 draft that addresses the Commission's Policy presented in SECY 95-132, "Policy and Technical Issues Associated with the Regulatory Treatment of Non-Safety Systems (RTNSS) in Passive Plant Designs (SECY 94-084)," Item E, Reliability Assurance Program, dated June 28, 1995. It provides the specific acceptance criteria for RAP and clarifies that the RAP related to the operational phase can be satisfied through existing programs. The section also describes guidance related to both design certification and combined license application reviews.

In addition, this revision has been administratively updated in accordance with NRR Office Instruction, LIC-200. The administrative update is comprised of assigning the review responsibilities by function, with the responsible organizations maintained separately from the SRP itself to minimize impacts of office reorganizations, and editorial and formatting changes. The revision also adds standard paragraphs to extend application of the updated SRP section to prospective submittals by applicants pursuant to 10 CFR Part 52.

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While this is a new SRP section, it does not expand the acceptance criteria introduced in the 1996 draft. In addition, it clarifies that the RAP operational phase can be addressed by existing programs. Based on the nature of the changes, we recommend that ACRS elect not to review the proposed revision to the SRP. If the ACRS determines that there is a need to review the proposed revision to the SRP, then please inform the technical contact and NRR will support a subsequent ACRS briefing. Also, the staff has determined that the changes do not involve any new staff positions; therefore, we will not be requesting a review by the Committee to Review Generic Requirements. Note that most SRP sections will be issued as final versions without publishing them as draft and requesting comment. The staff is revising the SRP in this manner to provide a more up-to-date SRP in light of the requirement in 10 CFR 50.34(h) for an applicant to evaluate its facility against the SRP revision in effect six months before the docket date of the application. In addition, this memo and its enclosure will be made publicly available as a preliminary SRP section revision. It will be formally published following reconciliation against the ongoing Part 52 rulemaking and regulatory guide updates including Regulatory Guide 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)." After formal issuance, the SRP will be available for public comment. Comment resolution will be addressed in subsequent SRP revisions. Prior to revision to individual sections, comment resolution may establish a basis for how alternatives to the NUREG-0800 acceptance criteria provide an acceptable method of complying with the NRC's regulations.

For questions concerning this document, please contact Paul Prescott at 301-415-3026 or Stephen Koenick, Project Manager for the SRP at 301-415-1239.

Enclosure:  
As stated