

November 6, 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 3.2.2, REV. 2, "SRP SECTION SYSTEM
QUALITY GROUP CLASSIFICATION"

The purpose of this memorandum is to transmit the proposed revisions to NUREG-0800, Standard Review Plan (SRP), Section 3.2.2, Rev. 2, "System Quality Group Classification" to the ACRS for its consideration with Regulatory Guide (RG) 1.26, "Quality Group Classifications and Standards for Water, Steam, and Radioactive Waste Containing Components of Nuclear Power Plants." This is an interim revision pending industry submission of a consensus standard on Safety Classification for Nuclear Regulatory Commission (NRC) endorsement.

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 revised SRP Section 3.2.2 (Enclosure). The revised technical portions of the SRP Section have been highlighted to aid in identifying the technical information that has been added or revised.

The present revision updates Revision 2 dated July 1981. In this revision, the staff affirms the content introduced in the 1996 draft.

Several specific technical changes subsequent to the 1996 draft are worth noting:

1. Incorporated reference to 10 CFR 50.69, with an explanation concerning the deterministic approach for classification compared to the alternative risk informed categorization process.
2. Included reference to SRP Sections 3.10 and 3.11 for qualification of equipment.
3. Provided reference to RG 1.76 and RG 1.201 pertaining to risk-informed classification.
4. Staff Requirements Memoranda dated July 21, 1993 is included as a reference.
5. Figure A-1 title has been revised to include passive designs and to clarify that main steam drain and bypass do not intersect.
6. Reference to outdated codes and standards have been deleted (SRM dated July 21, 1993).

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7. To provide for alternative system descriptions used in new advanced reactor designs, a qualifying statement is included under Review Procedures to clarify that the identified systems are examples of systems important to safety based on prior applications and that passive system Light Water Reactor(LWR) designs or non-LWR designs with functions important to safety in accordance with RG 1.26 may not be identified by these names. This update is coordinated with revision to RG 1.26, "Quality Group Classifications and Standards for Water, Steam, and Radioactive Waste Containing Components of Nuclear Power Plants."

Additional changes are summarized at the end of the SRP section revision itself.

In addition, this revision has been administratively updated in accordance with NRR Office Instruction, LIC-200, Standard Review Plan Process. 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.

This SRP is being provided for your consideration in conjunction with proposed revisions to RG 1.26. Based on the nature of the changes, we recommend that ACRS elect not to review the proposed revisions to the SRP. If the ACRS determines that there is a need to review the proposed revisions 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 DG-1145, "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 Richard McNally at 301-415-4008 or Manny Comar at 301-415-3863.

Enclosure:
As stated