

## **POLICY ISSUE INFORMATION**

July 28, 2008

SECY-08-0108

FOR: The Commissioners

FROM: R. W. Borchardt  
Executive Director for Operations

SUBJECT: SUMMARY OF ACTIVITIES RELATED TO GENERIC ISSUES PROGRAM

### PURPOSE:

This paper provides the annual summary of the Generic Issues Program (GIP) activities including improvements to ensure timely and effective resolution of generic issues (GIs). This paper does not address any new commitments.

### BACKGROUND:

In the staff requirements memorandum (SRM) related to SECY-05-0126, "Summary of Activities Related to Generic Safety Issues," dated August 31, 2005 (Agencywide Document and Management System (ADAMS) Accession No. ML052430101), the Commission directed the staff to develop a plan to focus renewed attention to the GIP to resolve the older GIs, and ensure that future GIs are resolved in a timely manner. In its response to that SRM, "Response to Staff Requirements Memorandum on SECY-05-0126, 'Summary of Activities Related to Generic Safety Issues,'" dated March 29, 2006 (ADAMS Accession No. ML053570259), the staff provided a plan to ensure timely resolution of GIs. The staff provided to the Commission updates and progress reports on this plan in SECY-06-0161, "Summary of Activities Related to Generic Safety Issues," dated July 20, 2006 (ADAMS Accession No. ML061860078), and SECY-07-0110, "Summary of Activities Related to Generic Safety Issues," dated July 6, 2007 (ADAMS Accession No. ML071620042). In SECY-07-0022, "Status Report on Proposed Improvements to the Generic Issues Program," dated January 30, 2007, (ADAMS Accession

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No. ML063460239) the staff discussed GIP improvement elements it will implement through a revision of Management Directive (MD) 6.4, "Generic Issues Program."

## DISCUSSION:

### *Status of Generic Issues*

Since the latest annual report to the Commission (SECY-07-0110), the staff closed two GIs. Three reactor GIs exited the GIP when responsibility for their implementation and verification was transferred to NRR in accordance with SECY-07-0022. These GIs in "regulatory office implementation" are proceeding under other established programs and processes, and continue to be tracked in GIMCS. Three reactor GIs remain open in the GIP. Additional details are provided below.

### Closed Generic Issues

During this reporting period, the staff closed GI-156.6.1, "Pipe Break Effects on Systems and Components," after completing the technical assessment. The staff closed this issue with no additional actions. The decision was based primarily on examinations of the layout of applicable operating plants, and no instance was found where a pipe break would directly disable both channels of any safety-significant system.

During this reporting period, the staff closed GI-NMSS-0007, "Criticality Benchmarks Greater Than 5% Enrichment," after issuing Fuel Cycle Safety and Safeguards (FCSS) Interim Staff Guidance (ISG)-10, "Justification of Minimum Margin of Subcriticality for Safety."

During this reporting period, the staff transferred the following three reactor GIs from the GIP to NRR for regulatory office implementation: GI-163, "Multiple Steam Generator Tube Leakage"; GI-189, "Susceptibility of Ice Condenser and Mark III Containments to Early Failure from Hydrogen Combustion During a Severe Accident"; and GI-191, "Assessment of Debris Accumulation on PWR Sump Performance." Their status will continue to be tracked and reported in GIMCS until completion by the program office.

### Open Generic Issues

The following three reactor GIs are open in the GIP: GI-186, "Potential Risk and Consequences of Heavy Load Drops in Nuclear Power Plants"; GI-193, "BWR ECCS Suction Concerns"; and GI-199, "Implications of Updated Probabilistic Seismic Hazard Estimates in Central and Eastern United States for Existing Plants." There are no open nonreactor GIs.

The enclosure provides the status of GIs being tracked in GIMCS.

### *Update on GIP Improvements*

In SECY-07-0022 and SECY-07-0110, the staff discussed implementing actions to ensure comprehensive and timely resolution of future GIs. The staff implemented the improvements and is finalizing revisions to MD 6.4, "Generic Issues Program," and its companion RES office instruction (OI), TEC-002, "Procedures for Processing Generic Issues." The staff is incorporating experience and lessons learned from the implementation of the new GIP process

into the revised MD and RES OI documents. For example, based on experience with GI-199, "Implications of Updated Probabilistic Seismic Hazard Estimates in Central and Eastern United States on Existing Plants," all issues that screen into the GIP will have an issue-specific communication plan prepared prior to release of the screening memorandum. The communication plan ensures consistent information on the specific GIs is clearly communicated and accessible to all interested parties. The staff plans to issue the revised MD 6.4 by October 2008.

#### *Communication of GIP Improvements*

In September 2007, the staff contacted key stakeholders and held an open public meeting to discuss GIP improvement initiatives. The revised MD and RES OI documents will incorporate feedback, as appropriate, from the stakeholders. Other staff activities include the following: (1) papers and presentations on the revised GIP at the 16<sup>th</sup> International Conference on Nuclear Engineering and the 2008 International Conference on Advances in Nuclear Power Plants, (2) ongoing improvements to make the GIP internal and external Web pages more useful by expanding the available information and improving its accessibility, (3) inter-office coordination on the MD 6.4 revision. Staff plans to provide agency wide training after issuing the revised MD 6.4.

#### *Lessons Learned from Implementation of the Revised GIP*

As previously discussed, the staff learned several important lessons during the implementation of the enhanced GIP and is including them in the revised guidance documents. These lessons include the following:

- (1) need for issue-specific communication plans to clearly and consistently provide the information on the issue;
- (2) clear documentation of GIP transitions whenever an issue enters the program, completes a stage, or responsibility is transferred to another program or office;
- (3) a mechanism to defer the acceptance review stage for a proposed issue, when detailed information is not available, but a scoping study to better characterize the issue can be completed within one year; and
- (4) a renewed focus on the importance of identifying and engaging all internal stakeholders during the screening stage for each GI.

#### *International Efforts*

In December 2007, the staff gave presentations at the Technical Meeting on Global Cooperation on Generic Safety Issues for Nuclear Power Plants and Measures for Their Resolution, in Bonn, Germany. Subsequent to that meeting, the staff concluded it was important for the NRC to be aware of any generic issues being assessed in other countries. To accomplish this, the staff conducted followup discussions with representatives from the International Atomic Energy Agency and the Nuclear Energy Agency of the Organization for Economic Co-operation and Development. The purpose of these discussions was to organize a meeting of experts from countries with programs similar to the GIP. The meeting is scheduled for September 2008, in

Vienna, Austria. At the proposed meeting, the participants will review and compare recent, relevant GIs from each country to share any technical results and development. In addition, the participants will discuss mechanisms for future information exchange and cooperation on GIs.

RESOURCES:

For Fiscal Year (FY) 2008, the staff estimates that the resources needed for these activities will total \$1,150K and 7.6 full-time equivalents (FTE). These resources are included in the FY 2008 budget as follows:

- RES: \$1,150K and 6.8 FTE
- NRR: 0.4 FTE
- NMSS: 0.1 FTE
- FSME: 0.2 FTE, and
- NRO: 0.1 FTE

For FY 2009 the staff has streamlined the GIP process and has reduced the total budget resources. However, the FTE has increased because there is an increase in the workload assisting with the resolution of existing issues during the regulatory assessment process. Thus, for FY 2009, the staff estimates that the resources needed for these activities will total \$850K and 8.7 FTE. The staff has budgeted the following resources for FY 2009:

- RES: \$850K and 7.5 FTE
- NRR: 0.8 FTE
- NMSS: 0.1 FTE
- FSME: 0.2 FTE, and
- NRO: 0.1 FTE

COORDINATION:

The Office of the General Counsel reviewed this package and has no legal objection. The Chief Financial Officer reviewed this package and determined that it has no financial impact.

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Enclosure:  
Generic Issue Management Control  
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