

MEMORANDUM

TO: R. P. Savio
FROM: J. N. Sorensen *JNS*
DATE: August 20, 1999
SUBJECT: PRA Steering Committee Meeting, 8/9/99

I attended the August 9, 1999 meeting of the Steering Committee for Risk Informed Activities as an observer. Copied of the agenda and attendance list are attached (Attachments 1 and 2).

The main agenda item was a presentation by Tom King and Don Cool on the status of, and proposed revisions to, the PRA Implementation Plan. This was essentially a preview, for critique by the Steering Committee, of the presentation the staff plans to make to the Commission on September 1, 1999. Tom King did not make copies of his (draft) slides available, except for the "Summary of Key Accomplishments" (Attachment 3). Don Cool provided copies of his slides (Attachment 4).

I don't believe that the proposed presentations included any information that has not already been made available to the ACRS. They essentially provided a routine status report, and did not appear to include any changes of direction or unexpected developments.

Significant questions raised (but generally not resolved) by the Steering Committee were:

(1) How will the NRC deal with the increasing pressure to define and adhere to "adequate protection"? It was noted that most (all?) recent rules fall into the category of enhanced protection, and must pass a cost/benefit test because they go beyond the adequate protection standard.

(2) The PRA Implementation Plan needs to be revised to include current NMSS activities (SECY-99-100).

(3) How will the NRC deal with requested licensing actions where the licensee has not invoked risk-base arguments? (This was raised as a policy issue in SECY-98-300.)

c: J. T. Larkins
ACRS Members
ACNW Members
ACRS/ACNW Staff and Fellows

Sorensen-Cox

Attachment 1**Proposed Agenda****PRA Steering Committee****(August 9, 1999, 3-5 pm)**

- **Review Status of development of staff guidance on the use of risk information in the treatment of non-risk informed license amendments (e.g., Callaway electrosleeve). This was an action item from SECY-98-300.** (NRR)

- **Review key issues for Aug. 25, 1999, Commission brief on the PRA Implementation Plan (i.e., what status, positions and issues should be brought to the Commission's attention). For example:**
 - **Risk-informing 10 CFR Part 50** (NRR/RES)
 - progress
 - plans
 - key issues

 - **Risk-informing NMSS activities** (NMSS)
 - plans
 - schedules

 - **Development of Agency Strategy for Risk-Informed Regulation** (RES)
 - outline
 - schedule

- **Plans for meeting with industry counterpart PRA Steering Committee** (All)

Attachment 2

Attendance List
PRA Steering Committee Meeting
August 9, 1999

Ashok Thadani
Donald Cool
Scott Newberry
Tom King
Luis Reyes (via video conference)
Richard Barrett
Joe Gray (part time)

Observers:

Mary Drouin
Mark Rubin
Tim Collins
Steve Mays
Gareth Parry
Cindy Carpenter
Norman Eisenberg
John Greeves

SUMMARY OF KEY ACCOMPLISHMENTS

- Significant progress over the past 6 months in reactor and non-reactor areas
- Substantial stakeholder input received:
 - GAO
 - CSIS
 - others
- Key topics and issues reviewed by PRA Steering Committee:
 - PRA Standard
 - risk-informed enforcement
 - framework for risk-informed non-reactor activities
 - Safety Goal Policy revision
 - strategy for risk-informed regulation
 - progress in implementation of SECY 98-300

Draft 8/9/99

BRIEFING OF PRA STEERING COMMITTEE



August 9, 1999
Donald A. Cool, Director
Division of Industrial and Medical Nuclear
Safety
Office of Nuclear Material Safety and
Safeguards

CHRONOLOGY

- Staff submitted SECY 99-100, “Framework for Risk-Informed Regulation in NMSS” to the Commission on March 31, 1999
- Briefed PRA Steering Committee on NMSS Proposal to establish Task Force (May 28, 1999)
- Commission approved the staff’s recommendations in SECY 99-100 in SRM dated June 28, 1999
- Staff established a Task Force on Risk Assessment and Risk Management in NMSS in July 1999 to:

BACKGROUND

- **SECY 99-100, recommended that:**
 - (1) **Staff implement the five step process described in Attachment 4**
 - (2) **Staff implement their approach for addressing risk management issues**
 - (3) **The Commission approve formation of a joint ACRS/ACNW Subcommittee for peer review**

SECY 99-100

- Directs the staff to:
 - (1) Develop appropriate material safety goals, analogous to the reactor safety goal
 - (2) Use an enhanced participatory process to develop these goals and include, as a goal, the avoidance of property damage
 - (3) Consider whether critical groups can be defined for classes of materials use

SECY 99-100 (continued)

- - (4) Give due consideration to existing radiation protection standards in 10 CFR Part 20, including the 100 millirem per year all-pathways dose limit and the tiered approach provided in the License Termination Rule
 - (5) Factor an Agreement State component into the decisionmaking process to avoid duplication
 - (6) Reprogram 6 FTEs to proceed with this effort

TASK FORCE ACTIVITIES

- Continue ongoing rulemakings (10 CFR Parts 35, 63, and 70)
- Develop milestones and schedules to implement SRM (Secy 99-100)
- Begin work scope to develop a materials safety goal
- Conduct partnering and staffing activities

RECENT ACCOMPLISHMENTS

- Met with ACRS/ACNW Subcommittee
- Developed preliminary methodology for assessing the risk associated with industrial and medical uses of nuclear material
- Completed proposed revisions to 10 CFR Part 70 to make it more risk-informed
- Proposed risk-informed regulations for possible disposal of high-level radioactive wastes at Yucca Mountain (10 CFR Part 63)

BACK-UP SLIDE

- Identify:
 - (1) candidate regulatory applications for risk-informed approaches;
 - (2) responsible organizations

- Decide how to modify current regulatory approaches

- Change regulatory approaches

- Implement risk-informed approaches

- Develop or adapt risk-informed tools

Distribution for JNS-99-21

ACRS Committee Members

Apostolakis, George E.
Barton, John J.
Bonaca, Mario V.
Kress, Thomas S.
Powers, Dana A.
Seale, Robert L.
Shack, William J.
Sieber, John D.
Uhrig, Robert E.
Wallis, Graham B.

ACNW Committee Members

Garrick, B. John
Hornberger, George M.
Wymer, Raymond G.

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Boehnert, Paul A.
Dudley, Noel F.
Duraishwamy, Sam
El-Zeftawy, Medhat M.
Larkins, John T.
Markley, Michael T.
Savio, Richard P.
Singh, Amarjit

ACNW Staff

Campbell, Andrew C.
Deering, Lynn F.
Larson, Howard J.
Major, Richard K.

ACRS Fellow

Cronenberg, August W.