



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D C 20555
December 11, 1997

The Honorable Shirley Ann Jackson
Chairman
U S Nuclear Regulatory Commission
Washington, D C 20555-0001

Dear Chairman Jackson

SUBJECT PROPOSED FINAL REGULATORY GUIDE 1 174 AND STANDARD REVIEW PLAN
 CHAPTER 19 FOR RISK-INFORMED, PERFORMANCE-BASED REGULATION

During the 446th and 447th meetings of the Advisory Committee on Reactor Safeguards, November 6-7 and December 3-6, 1997, respectively, we met with representatives of the NRC staff to review proposed final Regulatory Guide 1 174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Current Licensing Basis," and Standard Review Plan (SRP) Chapter 19 (General Guidance) for risk-informed, performance-based regulation. We discussed the staff's reconciliation of public comments on the subject documents, including proposed changes to address policy issues under consideration by the Commission. Our Subcommittee on Reliability and Probabilistic Risk Assessment (PRA) met with the staff and industry representatives on October 21-22 and November 12-13, 1997, to discuss these matters. We also had the benefit of the documents referenced.

Conclusions and Recommendations

- 1 We recommend that Regulatory Guide 1 174 and associated Standard Review Plan Chapter 19 be approved and issued for use by the industry and staff.
- 2 The modification of the acceptance guidelines to allow consideration of very small increases in CDF (core damage frequency) and LERF (large, early release frequency) for a broader range of the total CDF or LERF values is appropriate.
- 3 The decisionmaking process described in Regulatory Guide 1 174 and, in particular, its treatment of quantified and unquantified uncertainties, is sound. The staff has correctly focused on identifying the important sources of uncertainty and determining their impact on decisions, rather

than simply using the final distribution as the sole basis for decisionmaking

- 4 The staff discussion of PRA quality in these documents is appropriate. We agree with the staff position that the assessment of the scope and quality of the probabilistic analyses should focus on whether they are adequate for the purpose intended.

As we stated in our report dated March 17, 1997, we believe that this new process and these documents are a significant achievement that will contribute to the safe and efficient use of nuclear power.

We believe that these documents will evolve as experience is gained. We again urge the staff to seek innovative applications of the risk-informed approach to regulation so that this Regulatory Guide and the associated Standard Review Plan Chapter will be tested and improved upon in practice. We request the staff to brief the Committee periodically on this regulatory activity.

Sincerely,



R. L. Seale
Chairman

References.

- 1 Memorandum dated November 24, 1997, from M. Wayne Hodges, Office of Nuclear Regulatory Research, NRC, and Gary M. Holahan, Office of Nuclear Reactor Regulation, NRC, to John Larkins, ACRS, Subject "General Regulatory Guide (DG-1061) and Standard Review Plan (SRP-Chapter 19) for Risk Informed Regulatory Decisionmaking for Plant Specific CLB Changes," with attachments, as follows:
 - Proposed Final Regulatory Guide 1.174 (Draft Guide DG-1061) dated November 25, 1997, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Current Licensing Basis "
 - Proposed Final Standard Review Plan Chapter 19, Revision N, dated November 25, 1997, "Use of Probabilistic Risk Assessment in Plant-Specific, Risk-Informed Decisionmaking General Guidance "

- 2 Draft SECY dated November 7, 1997, from L Joseph Callan, Executive Director for Operations, NRC, for the Commissioners, "Final Regulatory Guidance on Risk-Informed Regulation Policy Issues "

