



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

March 12, 1998

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

Dear Chairman Jackson:

SUBJECT: PROPOSED FINAL STANDARD REVIEW PLAN SECTIONS AND REGULATORY GUIDES
FOR RISK-INFORMED, PERFORMANCE-BASED REGULATION FOR INSERVICE
TESTING, GRADED QUALITY ASSURANCE, AND TECHNICAL SPECIFICATIONS

During the 449th meeting of the Advisory Committee on Reactor Safeguards, March 2-4, 1998, we met with representatives of the NRC staff to review proposed final Standard Review Plan (SRP) sections and regulatory guides for risk-informed, performance-based regulation including individual applications for inservice testing, graded quality assurance, and technical specifications. We discussed the staff's reconciliation of public comments on the subject documents. Our Subcommittee on Reliability and Probabilistic Risk Assessment met with the staff and industry representatives on February 19, 1998, to discuss these matters. We also had the benefit of the documents referenced.

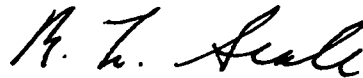
Conclusions and Recommendations

1. We recommend that Regulatory Guides 1.175 (Inservice Testing), 1.176 (Graded Quality Assurance), and 1.177 (Technical Specifications) and associated SRP sections be approved and issued for use.
2. We do not believe that Regulatory Guide 1.176 takes full advantage of the information that probabilistic risk assessment (PRA) provides. We recognize, however, that the lack of a model for assessing the quantitative impact of quality assurance requirements on PRA parameters makes this a particularly difficult document to write.
3. We recommend that the Office of Nuclear Regulatory Research consider a research project to assess the impact of quality assurance requirements on PRA parameters.

4. We recommend that the staff prepare a plan for improvements to Regulatory Guide 1.176 after experience with its application and related studies and brief the Committee sometime in the next two years.

As stated in our previous reports, we believe that the next major step in the process will be the use of these documents in practice. We urge the staff to move expeditiously to reach closure on the pilot risk-informed requests for changes to the current licensing basis that are currently under review. We were pleased to hear a presentation from the Nuclear Energy Institute on the new risk-informed initiative that it is sponsoring. We plan to follow developments in these activities with great interest.

Sincerely,



R. L. Seale
Chairman

References:

1. U.S. Nuclear Regulatory Commission, proposed final SRP Section 3.9.7, "Risk-Informed Inservice Testing," draft dated March 2, 1998 (Predecisional).
2. U.S. Nuclear Regulatory Commission, proposed final Regulatory Guide 1.175, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing," draft dated March 2, 1998. (Predecisional)
3. U.S. Nuclear Regulatory Commission, proposed final SRP Chapter 16.1, "Risk-Informed Decisionmaking: Technical Specifications," draft dated March 2, 1998 (Predecisional).
4. U.S. Nuclear Regulatory Commission, proposed final Regulatory Guide 1.176, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Graded Quality Assurance," draft dated March 2, 1998 (Predecisional).
5. U.S. Nuclear Regulatory Commission, proposed final Regulatory Guide 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," draft dated March 2, 1998 (Predecisional).
6. Report dated March 17, 1997, from R. L. Seale, Chairman, ACRS, to Shirley Ann Jackson, Chairman, NRC, Subject: Proposed Standard Review Plan Sections and Regulatory Guides for Risk-Informed, Performance-Based Regulation.
7. Report dated December 11, 1997, from R. L. Seale, Chairman, ACRS, to Shirley Ann Jackson, Chairman, NRC, Subject: Proposed Final Regulatory Guide 1.174 and Standard Review Plan Chapter 19 for Risk-Informed, Performance-Based Regulation.

8. Memorandum dated October 30, 1997, from John C. Hoyle, Secretary of the Commission, to L. Joseph Callan, Executive Director for Operations, NRC, Subject: Staff Requirements Memorandum - SECY-97-229, "Graded Quality Assurance/Probabilistic Risk Assessment Implementation Plan for the South Texas Project Electric Generating Station."
9. Memorandum dated May 28, 1997, from John C. Hoyle, Secretary of the Commission, to L. Joseph Callan, Executive Director for Operations, NRC, Subject: Staff Requirements Memorandum- SECY-97-095, "Probabilistic Risk Assessment Implementation Plan Pilot Application for Risk-Informed, Performance-Based Regulation."

