



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

March 16, 1998

Mr. L. Joseph Callan
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Callan:

SUBJECT: SECY-98-001, MECHANISM FOR ADDRESSING GENERIC SAFETY ISSUES

During the 449th meeting of the Advisory Committee on Reactor Safeguards (ACRS), March 2-4, 1998, we reviewed the subject SECY paper. During this review, we had the benefit of discussions with representatives of the NRC staff and of the referenced documents.

The Committee was briefed by the staff on the progress made on Staff Requirements Memorandum (SRM) 951219A concerning mechanisms for addressing generic safety issues (GSIs). Although some progress has been made, the ACRS believes that much work needs to be done to achieve a more efficient prioritization and resolution process. Our principal concerns relate to the following:

1. The sporadic issuance of the quarterly reports on the generic information management control system (GIMCS) requires management attention. GIMCS updates have not been issued in approximately a year.
2. Several safety-related issues are being tracked in the Office of Nuclear Reactor Regulation (NRR) Director's Status Report but not in GIMCS. If such issues in the Director's Status Report are generic in nature, they should be incorporated into the GSI prioritization process and tracked by GIMCS.
3. An adequate agency plan or schedule to resolve outstanding GSIs in a timely manner does not exist. Indeed, one HIGH- (GSI-23, 1983) and several MEDIUM-ranked GSIs (GSI B-17, 1982; B-55; B-61, 1983) that have been identified for quite some time remain to be resolved. The staff should establish schedules and resource requirements for resolution of GSIs according to their prioritization. Issues prioritized as HIGH should not remain open for 15 years.

4. The planning assumptions of the Office of Nuclear Regulatory Research (RES) call for the prioritization of two to three generic issues a year. The ACRS has not been briefed on any prioritizations during the past year, although we have been informed that the staff is currently working on two issues, GSI-169 (Boiling Water Reactor Main Steam Isolation Valve Failure Due to Accumulator Pressure) and GSI-107 (Main Transformer Failures).
5. As noted in NUREG/CR-4674, the Office for Analysis and Evaluation of Operational Data reports on operational events indicate that a number of GSIs designated as RESOLVED (e.g., Loss of Offsite Power, GSI-47; Failure of Protective Devices on Essential Equipment, GSI-2; and Containment Emergency Sump Performance, GSI-A43) may not have been adequately resolved.
6. We also note that agency expectations regarding the resolution of certain GSIs have not always been realized. Certainly, the planned resolution of GSI-172 (Multiple System Responses Program) largely stemmed from the premise that multiple system interaction issues would be addressed in the individual plant examination/individual plant examination of external events (IPE/IPEEE) process. A review of certain IPE/IPEEE submittals, however, has revealed that this premise has not always been correct. The IPEEEs that are based on qualitative analyses such as the Seismic Margins Method and the FIVE (Fire-Induced Vulnerability Evaluation) Method cannot resolve the issues of multiple system interactions.

In view of items 5 and 6, above, the ACRS is concerned about the adequacy of the GSI closure process.

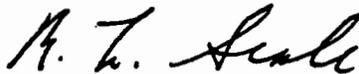
7. The SRM 951219A encouraged the Office of Nuclear Material Safety and Safeguards (NMSS) to evaluate and assign priorities to NMSS-related generic issues to ensure consistency of prioritization with reactor-related GSIs administered by RES and prioritized according to risk following the process described in NUREG-0933. In our discussions with the staff, we were informed that the prioritization of nonreactor NMSS-related GSIs was difficult. Even though NMSS has a measure of the consequences associated with a particular event, it does not have a method for assessing its frequency. Therefore, NMSS cannot perform a quantitative prioritization process similar to that used for reactor-related GSIs. This circumstance makes the requirement for establishing consistency of prioritization between nonreactor and reactor generic issues a challenge. We encourage NMSS to develop better capability to

apply risk assessment methodology in the prioritization of nonreactor GSIs. Until such capability is developed, the current practice of prioritization on the basis of qualitative consequences should be continued.

We were informed by the staff that requests are submitted annually to the regions, NRR, and AEOD to determine if recent operational events warrant reassessment of GSI issues previously classified as LOW in the GSI process. We recommend that this process be expanded to include GSIs classified as RESOLVED and that AEOD take the initiative in this regard.

The Committee would like to have a briefing from the NRC staff in the near future to discuss plans for resolution of the remaining 15 open GSIs, the process for closure of GSIs, and how to handle operational events identified by AEOD that continue to occur after GSIs have been closed.

Sincerely,



R. L. Seale
Chairman

References:

1. SECY-98-001, Memorandum dated January 2, 1998, from L. Joseph Callan, Executive Director for Operations, NRC, for the Commissioners, Subject: Staff Requirements Memorandum 951219A - Briefing on Mechanisms for Addressing Generic Safety Issues.
2. Memorandum dated January 19, 1996, from John C. Hoyle, Secretary of the Commission, to James M. Taylor, Executive Director for Operations, NRC, Subject: Staff Requirements - Briefing on Mechanism for Addressing Generic Safety Issues.
3. SECY-96-089, Memorandum dated April 30, 1996, from James M. Taylor, Executive Director for Operations, NRC, for the Commissioners, Subject: Comparison of Costs of Generic Requirements Estimated by the NRC with those Estimated by Industry; Staff Effort Expended on Generic Activities.
4. SECY-96-107, Memorandum dated May 14, 1996, from James M. Taylor, Executive Director for Operations, NRC, for the Commissioners, Subject: Uniform Tracking of Agency Generic Technical Issues.

5. U.S. Nuclear Regulatory Commission, NUREG/CR-4674, Vol. 25, "Precursors to Potential Severe Core Damage Accidents: 1996," A Status Report by ORNL, December 1997.
6. Memorandum dated February 6, 1997, from David L. Morrison, Director, Office of Nuclear Regulatory Research, NRC, to Addressees, Subject: Periodic Review of Low-Priority Generic Safety Issues.
7. Memorandum dated October 30, 1997, from Carl J. Paperiello, Office of Nuclear Material Safety and Safeguards, NRC, to Addressees, Subject: NMSS Policy and Procedures Letter 1-57, Rev. 1, "NMSS Generic Issues Program."