



U.S.NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

NEI Licensing Forum NUREG-1022, Revision 3 Update

Aron Lewin

Office of Nuclear Reactor Regulation

U.S. Nuclear Regulatory Commission



Outline

- **Process for Issuing Draft**
- **Overview of Draft Changes**
- **Process Going Forward**



Process for Issuing Draft

Basis for Revision

- **Several identified reporting issues could not be quickly resolved given ambiguities in NUREG-1022, Revision 2 guidance.**
- **Given time spent on issues, a decision was made to revise NUREG-1022.**
- **Draft NUREG-1022, Revision 3 issued for comment on October 13, 2011. Comments due December 12, 2011.**



Process for Issuing Draft

NUREG-1022, Revision 3 Expectations

- **A majority of issues that required significant resources to resolve will be addressed.**
- **Not all issues will be resolved. Items of a lesser significance or that occur infrequently will be evaluated on a case by case basis as they come up.**
- **After finalization of NUREG-1022, Revision 3, NRC to work with stakeholders if it is determined that issues need to be addressed.**



Process for Issuing Draft

Brief Overview

- **Issues identified and inputs solicited from external and internal stakeholders.**
- **Initial resolution of issues focused on the actual rule itself, it's associated Federal Register Notice, and staff guidance in that order.**
- **Enforcement or safety considerations then taken into account.**
- **Discussion of Change document and Draft Regulatory Analysis issued along with Draft NUREG-1022, Revision 3.**
- **Advisory Committee on Reactor Safeguards (ACRS) and the Committee to Review Generic Requirements (CRGR) informed of NUREG-1022 activities.**



Overview of Draft Changes

Areas of Higher Stakeholder Interest

- **Reporting of historical events that are not ongoing at the time of discovery under 10 CFR 50.72.**
- **Impact of Limiting Condition for Operation 3.0.3 entry on “Operations or Conditions Prohibited by Technical Specifications.”**
- **Systems within scope for reporting under “Events or Conditions that Could Have Prevented Fulfillment of a Safety Function.”**



Overview of Draft Changes

Areas of Higher Stakeholder Interest (continued)

- **Loss threshold for reporting under “Events or Conditions that Could Have Prevented Fulfillment of a Safety Function” (i.e. defining “Could Have”).**
- **What constitutes a “Loss of Emergency Preparedness Capabilities?”**
- **Revision of NUREG-1022 discussion on “Single Cause that Could Have Prevented Fulfillment of the Safety Functions of Trains or Channels in Different Systems.”**



Process Going Forward

Overview for Issuing Final NUREG-1022, Revision 3

- **Submit comments by December 12, 2011.**
- **Disposition of comments received. NRC to continue to involve internal and external stakeholders.**
- **Differences between draft and final process are relatively small. Final process also requires:**
 - **Division Director formal concurrence.**
 - **Submission to Congress in accordance with the Congressional Review Act.**
- **Based on Draft, finalization of NUREG-1022, Revision 3 estimated to take 18 months (~ June 2013).**



Process Going Forward

Event Reporting Guidance

- **10 CFR 50.72 & 50.73 Federal Register Notices and NUREG-1022, Revision 2, should be utilized when determining current staff positions until final publication of NUREG-1022, Revision 3.**
- **Upon final publication of NUREG-1022, Revision 3, it will contain guidelines that the staff of the NRC considers acceptable for use in meeting the requirements of 10 CFR 50.72 and 50.73. Revision 3 guidelines should be considered for historic events discovered after final publication.**
- **Enforcement considerations being evaluated.**



Process Going Forward

Other Considerations

- **Desire for workshops indicated. NRC can work with stakeholders to set up.**
- **NRC to also work with stakeholders if it is determined that newly identified issues need to be addressed.**

Questions?