

October 9, 2012

MEMORANDUM TO: R. W. Borchardt
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary **/RA/**

SUBJECT: STAFF REQUIREMENTS – SECY-12-0091 - COMPLETENESS
AND QUALITY OF INTEGRATED SAFETY ANALYSES

The Commission has approved the staff recommendation under Option 1 in the subject paper to request that the American Nuclear Society (ANS) develop an integrated safety analysis (ISA) standard that would provide clear guidelines for licensees that perform ISAs and provide licensees with an improved ability to identify those elements which serve as leading indicators of ISA quality. The staff should request that the ANS standard address explicitly the diversity of fuel cycle facilities and present methodologies appropriate to this diversity and include consideration of a peer review process.

The Commission has approved the staff's recommendation under Option 3 to improve guidance but in a fashion limited, as follows. Until such time as the ANS standard is completed, the staff should not revise guidance in NUREG 1520 on ISA topics related to the ANS standard, such as common cause failure, human error, and accident sequence screening. Rather, the staff should issue interim staff guidance only on those narrow topics previously identified by the staff as needing clarification to address ISA implementation issues, such as the use of passive design features, bounding assumptions, initial conditions, and the completeness of ISA summaries.

The Commission has approved Option 2 to continue the current practices that can enhance ISA quality similar to peer reviews.

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
OGC
CFO
OCA
PDR