

**STAFF PLANS TO ADDRESS SPECIFIC ITEMS FROM STAFF REQUIREMENTS
MEMORANDUM SECY-12-0071**

A. Hazards to be Addressed in Integrated Safety Analysis Summaries Related to Chemical Exposures

Staff Requirements Memorandum (SRM) SECY-12-0071 directs the staff to provide information on hazards to be addressed in Integrated Safety Analysis (ISAs) including thresholds for soluble uranium intake for workers. Additional consideration relates to dermal and ocular exposure to hydrofluoric acid and the use of the most up-to-date standards for acute chemical exposure from hazardous chemicals.

These issues are also relevant to facilities licensed under Title 10 of *the Code of Federal Regulations* (10 CFR) Part 70. The staff is currently developing guidance, applicable to both 10 CFR Part 40 and 10 CFR Part 70 licensees, to describe how soluble uranium intake and dermal and ocular exposures are assessed in evaluating the adequacy of safety controls. The draft guidance for soluble uranium intake was issued for public comment in September 2014. The staff plans to issue the draft guidance on dermal and ocular exposures for public comment in January 2015.

B. Develop Criteria for Determining Adequacy of Emergency Plans for 10 CFR Part 40 Facilities

The SRM directs that the staff develop criteria for determining the adequacy of an emergency plan for licensees subject to the 10 CFR 40.31(j) requirements. The SRM also directs that the staff should clearly identify the nature of the accident sequence licensees are required to evaluate and explain how licensees utilize information in ISAs to inform emergency plans.

The staff is currently in the process of revising NUREG-1520, "Standard Review Plan for Licensing a Fuel Cycle Facility," and will interact with industry and the public on the criteria for determining the adequacy of an emergency plan including the role of the facilities ISA in informing the emergency plan.

Enclosure

C. Guidance for Existing Facilities on Natural Phenomena

The SRM directs the staff to provide guidance for existing 10 CFR Part 40 facilities on how natural phenomena hazards can be addressed based on the results of the ISA. The SRM also directs that the staff provide licensees with an approach for demonstrating compliance with the performance requirements with and without necessarily modifying their facilities.

In August 2014, the staff issued for public comment a draft Generic Letter entitled "Treatment of Natural Phenomena Hazards in Fuel Cycle Facilities" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13157A158). The draft Generic Letter is intended to collect information from 10 CFR Part 40 and 10 CFR Part 70 fuel cycle licensees on their approach for analyzing natural phenomena event sequences to comply with existing regulatory requirements. To complement the Generic Letter, the staff is developing guidance on acceptable methods for demonstrating compliance with performance requirements regarding hazards posed by natural phenomena.

D. ISA Reviews without an ISA Standard

The SRM stated that as a separate effort and in parallel to revising the Part 40 ISA rule, the staff should also provide information to the Commission discussing how the ISAs would be conducted in the absence of the American Nuclear Society (ANS) standard.

The staff prepared COMSECY-13-0029 requesting Commission approval for staff to discontinue its development of interim staff guidance on ISA implementation issues (work item tracking system (WITS) 201200232) and development of information on how the ISAs would be conducted in the absence of the ANS standard (WITS 201300125). The Commission approved COMSECY-13-0029 and this action was accordingly closed.

Per SECY-12-0091, "Completeness and Quality of Integrated Safety Analyses" (ADAMS Accession No. ML12128A356), the staff is working with the ANS to develop an ISA standard that would provide clear guidelines for licensees that perform ISAs and that would provide licensees with an improved ability to identify those elements which serve as indicators of ISA quality.