

July 14, 1997

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

Dear Chairman Jackson:

SUBJECT: PROPOSED REGULATORY GUIDE AND STANDARD REVIEW PLAN
CHAPTER FOR RISK-INFORMED, PERFORMANCE-BASED INSERVICE
INSPECTION

During the 443rd meeting of the Advisory Committee on Reactor Safeguards, July 9-11, 1997, we met with representatives of the NRC staff to review the proposed Regulatory Guide DG-1063 and Standard Review Plan (SRP) Chapter 3.9.8 for risk-informed, performance-based inservice inspection. Our Subcommittee on Probabilistic Risk Assessment also met on July 8, 1997 with the staff, industry representatives, and other interested parties to discuss these documents and industry initiatives. We also had the benefit of the documents referenced.

We believe that the approach described in proposed SRP Chapter 3.9.8 and Regulatory Guide DG-1063 will lead to substantial improvements in inservice inspection for piping. In response to our comments, the staff identified changes it plans to make to these documents before they are issued for public comment. We recommend that these documents be issued for public comment subject to incorporation of those changes. The staff also proposed a list of questions regarding issues that arose during our meetings, which it plans to include in the Federal Register notice to solicit public comments. We agree with these questions.

Dr. Dana Powers did not participate in the Committee's deliberations regarding draft Regulatory Guide DG-1063.

Sincerely,

/s/

R. L. Seale
Chairman

References:

Memorandum dated June 3, 1997, from B. Sheron, NRR, M. W. Hodges, RES, L. C. Shao, RES, G. Holahan, NRR to J. Larkins, ACRS, Subject: Transmittal of Pre-decisional Draft Regulatory Guide DG-1063: "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Inspection of Pipes," and Draft Standard Review Plan Chapter 3.9.8, "Standard Review Plan for the Review of Risk-Informed Inservice Inspection Applications."