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The Honorable Ivan Selin
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Chairman Selin:

SUBJECT: PROPOSED RULEMAKING ON REPORTING RELIABILITY AND
AVAILABILITY INFORMATION FOR RISK-SIGNIFICANT
SYSTEMS AND EQUIPMENT

During the 419th and 420th meetings of the Advisory Committee on Reactor Safeguards, March 9-10 and April 6-7, 1995, we discussed with representatives of the NRC staff and the Nuclear Energy Institute a proposed rule that would require licensees to report reliability and availability data for risk-significant systems and equipment. We also had the benefit of the documents listed.

Data on the reliability and availability of risk-significant systems and equipment are essential for the expanded use of risk-based regulation. Plant-specific data could augment the effectiveness and efficiencies attributed to risk-based regulation. Neither the Licensee Event Reports nor the Nuclear Plant Reliability Data System provide all the data that are needed to support risk-based regulation.

The proposed rule would require licensees to provide periodic summary reports to the NRC on reliability and availability data for risk-significant systems and equipment. Records and analyses of demands, failures, and unavailabilities that provide the bases for these summary reports would be maintained onsite and would be available for NRC inspection.

The regulatory analysis developed by the staff indicates that a reliability and availability data base would provide significant benefits to both the licensees and the NRC. As part of the implementation of the Maintenance Rule, licensees will be required to maintain records of most, if not all, of these reliability and availability data. The staff plans to issue a final rule and its associated guidance document at the same time the Maintenance Rule goes into effect.

Representatives of the staff, the Institute of Nuclear Power Operations, and the Nuclear Energy Institute have reached agreements on the risk-significant systems and equipment that need to be addressed in the availability and reliability data base. The needed data on these systems and equipment have been defined. The staff is now proposing pilot programs to continue refinement of these definitions and to demonstrate the utility of the data base.

The staff feels that availability and reliability data needed to support risk-based regulation should be publicly available. The licensees have, however, taken the position that they will not

voluntarily submit data on reliability and availability if it is to become public.

We believe that high-quality, plant-specific reliability and availability data are needed if risk-based regulation is to fully reach its potential for both improving safety and reducing burdens on licensees. Our view on the public availability of the data is that the staff has taken the correct position. Consequently, we recommend publication of the proposed rule for public comment. We believe that the public comment process will be greatly enhanced if, at scheduled workshops, the staff presents examples of how data on reliability and availability will be applied.

Sincerely,

T. S. Kress
Chairman

References:

1. U.S. Nuclear Regulatory Commission, Draft Regulatory Analysis dated March 31, 1995, Subject: Reporting Reliability and Availability Information for Risk-Significant Systems and Equipment (received April 3, 1995) (Predecisional)
2. U.S. Nuclear Regulatory Commission, Draft 10 CFR Part 50, RIN 3150-AF33, "Reporting Reliability and Availability Information for Risk-Significant Systems and Equipment" (received April 3, 1995) (Predecisional)
3. Memorandum dated October 4, 1994, from Edward L. Jordan, Office for Analysis and Evaluation of Operational Data, to James M. Taylor, NRC Executive Director for Operations, Subject: Rulemaking to Collect Safety/Risk-Significant System and Equipment Reliability/Availability Data

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