



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

September 1, 1978

OFFICE OF THE
SECRETARY

MEMORANDUM FOR:

Lee V. Gossick, Executive Director
for Operations

FROM:

Samuel J. Chilk, Secretary

SUBJECT:

IMPROVING THE PROCESS FOR DETERMINING
THE NEED FOR NEW REACTOR REQUIREMENTS
(SEE SECY STAFF REQUIREMENTS MEMORANDUM
DATED JULY 14, 1978 REGARDING JULY 5
BRIEFING ON STANDARDIZATION OF
NUCLEAR POWER PLANTS - SECY-78-109A/B/C)

The Commission appreciates the staff's effort in preparing the July 5, 1978 Briefing on Standardization, during which a thorough exposition of the process by which new staff requirements are developed and approved was provided. The Commission believes, however, that a number of issues concerning that process were identified during the course of the briefing which may require further action by the staff. These include, but are not necessarily limited to, the following:

DPM

How might the staff most expeditiously proceed to define in more explicit - if not quantitative - terms the criteria for deciding when a requirement is essential to safety, while still recognizing that judgement is an inherent part of such decisions?

a-ELD
b-DSS

What needs to be done^{a)} to clarify the circumstances under which economic impacts associated with new requirements can and should be taken into account and to improve the quality of value-impact analysis of new requirements?

DPM

How should NRR decisions and the basis for new requirements best be documented and most expeditiously communicated to and implemented by those affected?

DPM

How can the NRR process be opened to observation or participation by interested persons outside of NRC so as to improve the quality of new requirements and the timeliness of their implementation?

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PSS Might RRRC membership and structure be altered to more appropriately account for the extent of demands on the time of senior staff personnel and the possibility of conflicts with their other duties?

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PSS What changes in NRR procedure might be adopted which would take better account of the concern that the precedent established by imposing new requirements in individual cases in the interim prior to RRRC review and approval (so-called category 4) makes RRRC approval and NRR adoption for generic use a foregone conclusion?

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PSS How might NRR procedures be improved to prevent the further accumulation of generic issues and to introduce greater predictability with respect to requirements to be imposed?

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DOR/DPM What might be done to better distinguish the basis for permitting a licensed reactor to continue operation pending implementation of a new requirement, whereas the operating license for a completed reactor may be withheld until the new requirement has been incorporated?

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DSS How might NRR identify and eliminate elements of the standard review plan which make an insignificant contribution to overall plant safety, so that staff and industry resources can be focused on matters of most significance to safety?

The staff is asked to inform the Commission, by October 16, 1978, of what actions it believes are appropriate in response to these issues.

cc: Chairman Hendrie
Commissioner Gilinsky
Commissioner Kennedy
Commissioner Bradford
Commissioner Ahearne
Acting General Counsel
Director, Policy Evaluation