

QUESTIONS FOR STEVE VARGA CONCERNING
REGULATORY REQUIREMENTS REVIEW COMMITTEE

1. Please describe your participation and responsibilities with respect to the Regulatory Requirements Review Committee. Include length of service, to whom you are responsible in this activity, assigned responsibilities, and also your activities on behalf of the RRRC which are not or have not been assigned responsibilities but those efforts which you felt were necessary.
2. What is your understanding of the RRRC charter, as originally developed and as changed, if you consider that it has changed?
3. April 2, 1974 memoranda to the licensing staff and reactor projects staff by J. F. O'Leary and A. Giambusso, respectively, were apparently the first written exposition of the general charter and function of the RRRC. Are you aware of any subsequent documents of that type which served to reinforce or modify the original charter or functional description of the RRRC?
4. The O'Leary memo of April 2, 1974 stated in part that "The RRRC will review significant new proposed Regulatory requirements or proposed changes that provide significant relief from existing requirements, and decide whether, when, and to what reactor plants these changes should be applied." (emphasis added) Do you believe that this directive has been followed? If so, please give examples of what the RRRC has specified with regard to "when" operating plants would be required to demonstrate compliance with an item considered by RRRC to be "Category 3," requiring backfit by all plants. If not so, can you recall any discussion or

decisions resulting in RRRC operation along slightly different lines than apparently intended by the 1974 O'Leary memo?

5. In a memo summarizing meeting number 31 of the RRRC (E. Case to L. V. Gossick, 9/24/75), it was announced that RRRC decisions would be "characterized...as to its backfitting potential." Was Category 3 ("clearly backfit") intended to be equivalent to the "substantial additional protection which is required for the public health and safety" defined in 10 CFR 50.109? Was there ever any discussion of a relationship or correspondence between 50.109 and Category 3?
6. What was the staff procedural mechanism (prior to March 1979) apprising applicants and licensees of these official positions of the Office of Nuclear Reactor Regulation, and for interacting with applicants/licensees to assure compliance? (Note that the RRRC in meeting number 31 also recommended that Regulatory Guides should carry implementation directions only to the extent of declaring the date after which new applications would be examined for compliance with the new positions; i.e., no "backfit" requirements would be documented in guides).
7. Early in 1979 the NRC announced some changes in the operation of the RRRC. Do you feel that any of the announced changes will improve the process of obtaining and assuring applicant/licensee compliance with Category 2 and 3 decisions in a reasonable period of time after the decision? What do you believe should be done to improve early implementation of RRRC decisions which become ONRR positions?

8. Do you feel that the RRRC as constituted is the right group of people to do this work? Are all members active participants? Should different or more (internal) organizations be represented?
9. What other or more information should be available to the RRRC . . . its deliberations?
10. Is there anything you would like to comment on or recommend at this time?