

Bill ~~Smith~~ 11/7

R3C 6/19

Some material of possible
interest to anyone studying the
licensing process, particularly the
origin and development of new
requirements.

Tom Cox 6/19/79

These were used in a presentation
to the Commission - by R DeYoung -
on or about July 1977

POOR ORIGINAL

8002100082 H

CHANGES IN REQUIREMENTS

- Not all Changes are Reviewed by RRRC.
 - Clarification and Editorial Changes.
 - Change Rated as Significant and Approved for Implementation by NRR Division and Office Director on Ongoing Reviews Pending Review by RRRC.
 - Cat. 4 Requirements.
- However, Safety Significance is Determined by Some Intermediate Management Levels for Every Change.
- The Problem is the Same — What Criteria are Used for the Determinations.

CHANGES (CONTINUED)

- Changes can Involve:
 - Need for Different Equipment Design
 - Need for Different Equipment Arrangement
 - Need for More Detailed Analyses
 - Need for Additional Testing
 - Need for Revised Procedures
- In Most Cases Industry Views the Changes Imposed by the Staff Not to be Justified. Changes That are Forwardfit are Objectionable to Applicants but it is the Backfitting of Changes That is Particularly Onerous to Licensees.

CHANGES

- Some Changes Relax Staff Requirements.
- Most Changes, However, Increase Staff Requirements of What is Needed to Demonstrate That the Level of Safety Provided is in Accord With the Regulations.
- Staff Proposals for Changes Come About as a Result of:
 - Construction Experience
 - Operating Experience
 - Licensing Experience
 - Results of R&D
 - Test Results
 - Results of More Refined Analyses
 - Detection of Past Errors
 - Increase in Staff Expertise

REGULATORY REQUIREMENTS REVIEW COMMITTEE (RRRC)

- Formed in March 1974 by L.M. Muntzing.
- Reports to EDO.
- General Charter.
 - Stabilization of Requirements.
 - Establish an Orderly Process of Defining and Implementing Needed Changes.
- Formed While SRP was Under Development.

MATTERS REVIEWED BY RRRC

- Regulatory Guides
- Branch Technical Positions
- Rule Changes
- Petitions for Rule Making
- Replies to Letters
- Standard Review Plans
- Staff Papers

RRRC MEMBERSHIP

Initial (1974)

E.G. Case (Chairman)
R.B. Minogue
A. Giambusso
J.M. Hendrie
J.G. Davis

*Non-Voting

Current (1978)

E.G. Case (Chairman)
R.B. Minogue
R.S. Boyd
R.C. DeYoung
V. Stello
R.J. Mattson
N.C. Moseley
H.D. Thornburg
T.E. Murley
S. Hanauer*

RRRC — SUMMARY OF MEETINGS AND DECISIONS

Time Period	No. of Mtgs	Decisions			
		Cat. 1	Cat. 2	Cat. 3	Total
Mar. — Dec. 1974	20	22	4	2	28
Jan. — Jun. 1975	10	3	0	2	5
Jul. — Dec. 1975	12	20	4	3	27
Jan. — Jun. 1976	8	11	4	3	18
Jul. — Dec. 1976	6	10	5	2	17
Jan. — Jun. 1977	8	14	5	3	22
Jul. — Dec. 1977	6	13	5	2	20
Jan. — Jun. 1978	6	7	2	3	12
Totals	76	100	29	20	149
Avg/Month	1.5	1.9	0.6	0.4	2.9

THE RRRC PROCESS

- A Change is Proposed Thru Normal Channels to Division or Office Director.
- If the Director Concurs He Submits the Proposed Change to the RRRC Chairman With a Request for Committee Review. In NRR Each Division Director Obtains Prior Concurrence, From Other NRR Division Directors, That Matter is Ready for RRRC Review.
- The RRRC Technical Secretary Includes the Subject — Usually With Others — for RRRC Review at a Forthcoming Meeting.
- The Secretary Prepares and the Chairman Issues an Agenda for the Meeting With Copies of the Information in Support of Each Proposed Change — Usually a Few Weeks Before the Meeting.

THE RRRC PROCESS (CONTINUED)

- The RRRC Meeting is Held — Usually About Half a Day.
 - Short Presentation by Sponsor Group and Groups or Individuals Opposing Change.
 - Questions and Answers.
 - Roundtable Discussion.
 - Decision Proposed and Voted Upon — Many Decisions are Unanimous but Many are Not.
- Secretary Prepares Decision Memorandum for RRRC Chairman's Signature — This Usually Issues Within a Few Weeks of Meeting.

PUBLIC/INDUSTRY INPUT

- No Direct Formal Input From Public or Industry is Requested.
- However, by Virtue of the Process of Development of Most Changes, a Great Deal of Input From Industry, Members of the Public, Local, State, and Federal Government Agencies, and From Public Interest Groups is Indirectly and Informally Accumulated Both with Respect to the Technical Merit of the Position as Well as to its Impact.

BASIS FOR RRRC DECISIONS

- Collection of Members' Individual Judgments
- Individual Judgments Derived From:
 - Quality of Information Provided
 - Personal Background and Experience
 - Education
 - Familiarity With Viewpoints of Others
 - Within NRC
 - Outside NRC
 - ACRS
 - Familiarity With Wash-1400 and Other Related Approaches and Results
 - Familiarity With Regulations and Their Bases

QUALITY AND EXTENT OF VALUE/IMPACT ANALYSES

- Quality
 - Some Have Been Excellent.
 - Generally, However, There has Been and is Need for Improvement.
- Extent of Use
 - Required for Each Proposed Change Reviewed by RRRC.
 - Matters Considered at 76th Meeting.

● Revision 2 to Rg. 1.68	16 Pages
● Revision 3 to Rg. 1.29	1.5 Pages
● Revision 1 to Rg. 1.128	0.3 Page
● Proposed Rg. on Valves	4 Pages
● Need for RRRC Review of Limited Changes to SRP 3.9.2 and 6.2.6	Oral

ADDITIONAL CHECKS & BALANCES

- ACRS
- OELD
- Public Interest Groups
- Industry
 - Applicants and Licensees — Appeals
 - Vendors and Architect-Engineers — Appeals
 - AIF

THE APPROVAL CHAIN

The RRRC is an Important Part — But Only a Part — of the Management System of Checks and Balances for Review and Approval of Significant New Requirements.

The Overall Chain for the Development and Imposition of new Requirements is:

- (1) Reviewers and Project Manager
- (2) Section Leaders
- (3) Branch Chiefs
- (4) Assistant Directors
- (5) Division Directors
- (6) RRRC
- (7) Office Director

DOCUMENTATION OF DECISIONS

- Memorandum to EDO.
 - Distribution Down to all Involved AD's.
 - Sponsoring Group is Informed Immediately.
 - Public Document Room.
- Memorandum From Director, NRR to Staff.

- EARLY 1979

RECENT CHANGE TO RRRC PROCESS TO PROVIDE MORE PUBLIC INPUT

1. RRRC Will Not Review Changes To SRP's Or RG's Until 60 Days After Public Comments Are Solicited.
2. Public Comments Will Be Solicited By A Federal Register Notice And By Direct Mailing To:
 - Government Agencies
 - Industry
 - Professional Societies
 - Public Interest Groups
 - Unions
3. Comments Will Be Requested On:
 - SRP Or RG Positions
 - Associated Draft Value-Impact Analyses
 - Associated Implementation Schedules
4. RRRC Recommendations Will Not Be Implemented Until After They Are Made Public.
5. Appeals Of The RRRC Recommendations Can Be Made Up To 30 Days After They Are Made Public To:
 - H. Denton, Director, NRR (SRP's)
 - R. Minogue, Director, SD (RG's)