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February 6, 1979

OFFICE OF THE
GENERAL COUNSEL

MEMORANDUM FOR: Joseph Fouchar, OPA

FROM: John Ahearne

SUBJECT: COMMISSION STATEMENT ON REACTOR LICENSING

In his memorandum of January 22nd, Commissioner Gilinsky recommended that, in the light of Congressional, press, and public reaction to the recent Commission policy statement on the Reactor Safety Study, the Commission should publish a statement on the basis for NRC's licensing of reactor construction and operation. Commissioner Bradford, in his memorandum of January 31st, stated that any such statement should be limited to describing our regulatory process and its objectives and should not include any qualitative conclusions about how safe reactors are. I agree with both of these views. Further, any Commission statement should of course be accurate and easily understandable by the public. I have attached a list of the elements which could be appropriately discussed in such a Commission statement.

Attachment

cc: Chairman Hendrie
Commissioner Gilinsky
Commissioner Kennedy
Commissioner Bradford
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26-10

Elements of a Commission Statement on the Reactor Licensing Process

I. Introduction

- A. Objective of the NRC's regulatory process
- B. Brief overview of the regulatory process (each element to be amplified in following sections)
 - 1. Regulations, standards, and technical specifications
 - 2. Safety and environmental assessments
 - 3. Multiple reviews of license applications
 - 4. Field inspection of reactors during construction and operation

II. Regulations, Standards, and Specifications

- A. The objective of setting regulations, standards, and technical specifications
- B. The various kinds (e.g., siting, design, performance); typical factors and parameters covered
- C. A brief description of the rulemaking process

III. Multiple Physical Barriers

A brief discussion of the multiple physical barriers to release of radiation and how the technical specifications are intended to reduce the probability that any and all of the barriers are breached.

IV. Defense-in-Depth

A brief description of this concept, including how plant design, redundant operating systems, and safety systems all contribute to defense-in-depth.

V. The Licensing Process

A brief description of the steps from preapplication guidance to inspection of operating reactors in the licensing and review process, pointing out the "multiple review" and conservative nature of the process and the objective of each step.

VI. The Inspection and Enforcement Program

A brief description of the I&E program, including its objectives, construction and operating inspections, the resident inspector program, and enforcement procedures.

VII. Operational Experience

A brief discussion of how lessons are learned from operating reactors and fed back into the licensing process. A description of a specific example would be helpful to the lay reader in his understanding of this process.