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OCT 10 1980

MEMORANDUM FOR: NRR Branch Chiefs

FROM: Frank Schroeder, Acting Director
Division of Safety Technology

SUBJECT: GUIDANCE ON REASSESSMENT OF SECONDARY REVIEW RESPONSIBILITY ASSIGNMENTS FOR STANDARD REVIEW PLAN REVISIONS

In preparing revisions to SRP sections as requested by Mr. Denton's memorandum of September 15, 1980, attention should be given to the assignment of secondary review responsibilities, so that the revised SRP will accurately reflect our current review process and provide assurance that the integrated review is complete and well-coordinated among branches.

Harold Denton's memorandum to NRR Division Directors of August 12, 1980 assigned primary and secondary review responsibilities to specific branches and instructed these branches to reassess their secondary review assignments in light of the criteria contained in the memo. At present, 175 SRP sections have over 650 secondary review responsibilities assigned. We expect that application of the criteria (which limit the designation of secondary review responsibility to cases where a branch provides written information routinely to the project manager or the primary review branch) will result in a decrease by sixty percent or more in secondary review assignments. The basic reason for this is that previously the secondary review responsibility assignment was used as a means to define the sometimes complex interfaces that occur among branches or among other SRP sections. In most cases, the needed information or support was minor in nature so that it did not represent a direct input into the primary branch's SER write-up. What was reflected was the effort involved in coordinating the overall review to assure completeness. As secondary review responsibilities are deleted, the interaction between branches for providing needed information or identifying the review expected from other branches that are required to permit the primary review branch to complete its review will be clearer. But the coordinating effort with other branches not now listed as secondary reviewer could be lost. We believe that a clear picture of the means used to coordinate the review effort between branches must be preserved. Thus, individual SRP sections should indicate in some manner this necessary coordination.

In the present version of the SRP, a branch designated as a secondary reviewer was often only expected to examine some aspect of the design where its area of expertise could be used in the review. In many such cases, the secondary branch performs the intended review in the context of another SRP section where it is the primary branch. The revised SRP sections should document the staff's actual review process, so that the integrated review can be tracked from branch to branch. Therefore, when a secondary review assignment

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is deleted, in many cases it may be appropriate to replace it with a reference that instructs the reviewer to coordinate his review effort with the branch that was previously listed as secondary reviewer, identify what portion of some particular design aspect they are reviewing, and identify the SRP section under which the review is performed. This aspect is especially significant when the reviewing branch for one SRP section is indicating that a requirement has been satisfied (for the systems under review in that SRP section), but complete satisfaction of that requirement is determined by additional reviews being performed under other SRP sections.

Three subject areas: Fire Protection, Technical Specification, and the Quality Assurance have been identified where reviews are performed for the most part entirely and completely by the branches responsible for those SRP sections. Any effort necessary to coordinate the review will be directed by those branches. For each of these reviews approximately 80 to 90 percent of the SRP sections could and/or should list one or more of the Title 10 regulations that are associated with these subjects.

Since the review of each of these subjects is done in an integrated manner within a specific SRP section, it will suffice that the other SRP sections to which each topic applies make specific reference to the review conducted elsewhere (see example). Each SRP should only address these subject areas (with review procedures and evaluation findings) when review aspects beyond the normal scope in the referenced areas are necessary to make the review sufficiently complete.

The enclosure provides an example of the sort of reanalysis and revision of secondary review responsibilities we believe is appropriate. Note that it is provided only for illustration and may not accurately reflect the situation for the SRP section chosen.

Original signed by
Frank Schroeder

Frank Schroeder, Acting Director
Division of Safety Technology

Enclosure:
Example of Reassessment of Secondary
Review Responsibilities and
Review Process Interfaces with
other Branches

Original signed by
Frank Schroeder

cc: H. Denton
E. Case
NRR Division Directors
NRR A/D's
R. Grimes

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EXAMPLE OF REASSESSMENT
OF
SECONDARY REVIEW RESPONSIBILITIES
AND
REVIEW PROCESS INTERFACES WITH OTHER BRANCHES

A. Excerpt from Present SRP Write-up

SECTION 9.1.1 NEW FUEL STORAGE

REVIEW RESPONSIBILITIES

Primary - Auxiliary Systems Branch (ASB)

Secondary - Mechanical Engineering Branch (MEB)
Structural Engineering Branch (SEB)
Materials Engineering Branch (MTEB)
Core Performance Branch (CPB)
Radiological Assessment Branch (RAB)
Equipment Qualification Branch (EQB)

1. AREAS OF REVIEW

[Secondary Responsibilities are generally discussed after the discussion of specific review areas.]

Secondary reviews are performed by other branches and the results used by the ASB to complete the overall evaluations of the system. The secondary reviews are as follows: the SEB determines the acceptability of the design analyses, procedures, and criteria used to establish the ability of facility structures to withstand the effects of natural phenomena such as the safe shutdown earthquake (SSE), the probable maximum flood (PMF), tornadoes and tornado missiles. The MEB reviews the seismic qualification of components and confirms that components and structures are designed in accordance with applicable codes and standards. The MTEB verifies, upon request, the compatibility of the materials of construction with service conditions. The CPB verifies, upon request, that the $K_{eff}$ of loaded storage racks is acceptable. The RAB reviews the adequacy of the radiation monitoring system.

B. Reassessment Analysis

1. The Equipment Qualification Branch is the only branch listed as a secondary reviewer that intends, or needs, to provide direct input into the Auxiliary Systems SER write-up for this Systems review [this is an assumption for the convenience of this example, and therefore, does not necessarily represent the actual case].

Enclosure

2. The interactions with Structural Engineering Branch, Mechanical Engineering Branch, and Radiological Assessment Branch reviews should continue to be noted, but the discussion should refer to the SRP section under which each branch performs the review as the primary review branch.

3. The Core Performance Branch and the Materials Engineering Branch provide an evaluation upon request; they do not as a matter of normal routine perform a safety review of New Fuel Storage for each plant.

4. The Fire Protection review, the Technical Specification review, and the Quality Assurance review are performed in accordance with SRP sections 9.5.1, 16.0 and 17.0, respectively.

We would conclude that the secondary review branches listed in items 2 and 3 above should be deleted from the assignments for the reasons stated. As part of the reassessment exercise each primary branch should review each regulation listed in the acceptance criteria to determine that all branches associated with the coordinated review are identified and referenced as in items 2 or 3 above. The branches identified must perform a portion of the review that contributes to the conclusion that, based on the integrated review, the requirements of the regulation are met. Delete references to regulations that pertain to fire protection, technical specification or quality control in the acceptance criteria and evaluation findings subsections of this SRP section and replace with a reference as indicated below.

C. Excerpt from Revised SRP Writeup

SECTION 9.1.1 NEW FUEL STORAGE

REVIEW RESPONSIBILITIES

Primary - Auxiliary Systems Branch (ASB)

Secondary - Equipment Qualification Branch (EQB)

1. Areas of Review

[Same as before, except delete some regulations as noted above.]

A secondary review is performed by the Equipment Qualification Branch, and the results are used by the ASB to complete the overall evaluation of the system. The EQB will provide a listing [state what is needed by ASB] and verify that components can function in the environmental conditions for which they are designed [and any-

thing else necessary to support ASB conclusions or analysis in the SER writup]. In addition, the ASB will also coordinate other branches evaluations that interface with the overall review of the system as follows: SEB determines the acceptability of the design analyses, procedures, and criteria used to establish the ability of facility structures housing the system to withstand the effects of natural phenomena such as the safe shutdown earthquake (SSE), the probable maximum flood (PMF), tornadoes and tornado missiles as part of their primary review responsibility for SRP section 3.X.X. The RAB reviews the location and adequacy of the radiation monitoring system as part of their primary review responsibility for SRP section 12.XX. The MTEB verifies, upon request of ASB, the compatibility of the materials of construction with service conditions. The CPB verifies by independent analysis, upon request of ASB, that for plant unique designs the $K_{eff}$ of loaded storage racks is acceptable. The reviews for Fire Protection Technical Specifications, and Quality Assurance are coordinated and performed by Chemical Engineering Branch, Licensing Guidance Branch, and Quality Assurance Branch as part of their primary review responsibility for SRP sections 9.5.1, 16.0, and 17.0, respectively.