



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

ACRS  
R-0900

October 14, 1980

MEMORANDUM FOR: William J. Dircks, Executive Director for Operations  
FROM: Raymond F. Fraley, Executive Director, ACRS *Raymond F. Fraley*  
SUBJECT: COMMENTS ON THE NRC STAFF'S PRELIMINARY PLANS FOR ADDRESSING  
THE REQUIREMENTS IN SECTION 110 OF THE FY-80 NRC AUTHORIZATION BILL

During its 246th meeting, October 9-11, 1980, the ACRS discussed with the NRC Staff their preliminary plans for addressing the requirements of Section 110 of the NRC FY-80 Authorization Bill. The Staff also discussed this subject with the Reactor Operations Subcommittee on October 7, 1980 and requested ACRS comments. The Committee had the benefit of written comments by the Atomic Industrial Forum.

It is the Committee's view that the lists derived from Criteria II and III as currently presented by the NRC Staff do not include all the items of particular significance to safety. For example, General Design Criterion 29 is not included. Additional screening should be done to ensure that all items of particular significance are included. The Committee also recommends that some other groups within the NRC Staff, such as PAS and AEOD, carry out an independent review in order to increase the likelihood that the screening process has not omitted items of particular significance. This review could also be used to establish a priority, based on risk reduction potential, in which the review items should be addressed.

The Committee noted your comment on SECY-80-414 and endorses your intent to implement tight management controls to limit staff and industry effort to areas of potential safety payoff; guarding against the potential for a large drain on Staff and licensee resources that would not produce commensurate improvements in safety. The Committee would appreciate being kept informed of additional developments in this area, particularly on the nature of comments received as a result of the call for public comments scheduled to begin following issuance by the Staff of the final draft plan for addressing Section 110.

cc: ACRS Members  
H. Denton, NRR  
F. Schroeder, DST  
M. Ernst, DST  
G. Zech, NRR  
S. Chilk, SECY

10/15/80  
THD 3100