

MAR 26 1982



MEMORANDUM FOR: William J. Dircks
Executive Director for Operations

FROM: Victor Stello, Jr., Chairman
Committee to Review Generic Requirements

SUBJECT: MINUTES OF CRGR MEETING NO. 10

The Committee to Review Generic Requirements met on Wednesday, March 17, 1982 from 1-5 p.m. Attendance is shown in the Enclosure. The following matters were considered:

1. Mr. Baer and Mr. Kiessel of IE presented a proposed Circular on Surveillance of Hydraulic Snubbers. The Circular proposed that licensees alter their plan for random sample testing of hydraulic snubbers by biasing the samples toward snubbers installed on systems subject to vibration and sudden piping movement such as water hammer. This recommendation was based on snubber failure experience at the Brunswick-2 facility. The Committee suggested that an Information Notice containing no requirements for licensee action would be more appropriate than a Circular and that the systems having the highest rate of snubber failures should be explicitly identified in the notice.
2. Mr. Grimsley of ADM briefed the CRGR on the draft Regulatory Analysis Procedures produced by the Task Group appointed by the EDO to review and recommend improvements in NRC's guidelines for performing value-impact analyses. Committee members made the following suggestions to Mr. Grimsley:
 - (a) There should be a single set of regulatory analysis procedures that addresses the majority, if not all, of NRC's needs for value-impact analysis. The procedures should be consistent with the CRGK Charter ultimately approved by the Commission.
 - (b) The scope and depth of a regulatory analysis for a proposed regulatory action should be proportional to the judged impact of the action, and there should be guidelines for determining when an analysis is not required.
 - (c) The derivation and sources of benefit/cost information and confidence in such information should be included in the regulatory analysis.
 - (d) The items listed in Appendix A, Checklist for Identifying Potential Impacts on NRC Programs and Activities, should be

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identified as a guide for the staff to use during the development of a proposed regulatory action. The checklist should not be required to accompany the proposed action.

- (e) Appendix B, Procedure for the Early Identification of Potential Impacts, should not be a requirement.
 - (f) Appendix E, Guide for Constructing a Summary Table of Regulatory Consequences, should not be required to accompany the proposed action.
 - (g) Regulatory analyses for alternatives to a proposed regulatory action should not be required.
 - (h) The methodology and criteria for performing the regulatory analysis needs to be developed and included in or referenced by the draft procedures.
3. Mr. Rowsome of RES briefed the CRGR on the research programs under way and planned to develop methodology for value-impact assessments. The Committee noted that it may from time-to-time request research assistance in this area.

Original Signed by
V. Stello

Victor Stello, Jr., Chairman
Committee to Review Generic Requirements

Enclosure: List of
Attendees

cc: CRGR Members
Office Directors
G. Cunningham, ELD
Commission (5)
R. Baer, IE
D. Grimsley, ADM
F. Rowsome, RES

Distribution:
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CRGR MEETING #10 ATTENDANCE

CRGR MEMBERS

Don Mausshardt
Joe Scinto
R.A. Purple (for Darrell Eisenhut)
J. Heltemes
Ed Jordan
R. Bernero
V. Stello, Jr.

Others

Walt Schwink, DEDROGR
Tom Murley, DEDROGR
Dan Guzy, RES
Bob Erikson, NMSS
Ed Blackwood, DEDROGR
Mat Taylor, DEDROGR
Steve Stern, NRR
Tom Cox, DEDROGR
Robert Baer, IE
Horace Shaw, NRR
Richard J. Kiessel, IE
W. Minners
John Austin, OEDO
Joe Felton, DRR
John Philips, DRR
F.X. Cameron, RES
M. Messier, AEAB
Daniel R. Muller, NRR
F.H. Rowsome, RES
A. DiPalo, RES
G.K. Tomlin, RES