

NOTATION VOTE

RESPONSE SHEET

RELEASED TO THE PDR
2/9/94
date initials

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION

FROM: COMMISSIONER REMICK

SUBJECT: SECY-93-331 - LICENSE RENEWAL WORKSHOP
RESULTS AND STAFF PROPOSALS FOR REVISION TO
10 CFR PART 54, "REQUIREMENTS FOR RENEWAL OF
OPERATING LICENSES FOR NUCLEAR POWER PLANTS"

APPROVED X ^{w/comment} DISAPPROVED _____ ABSTAIN _____

NOT PARTICIPATING _____ REQUEST DISCUSSION _____

COMMENTS:

Please see the attached

9402160270 940113
PDR COMMS NRCC
CORRESPONDENCE PDR

150043

[Signature]

SIGNATURE

RELEASE VOTE

13 Jan 94
DATE

WITHHOLD VOTE

ENTERED ON "AS" Yes No _____

Commissioner Remick's Comments on SECY-93-331

I approve the staff's plans to develop proposed requirements for renewal of operating licenses for nuclear power plants, as the staff has generally described in SECY-93-331.

I caution the staff against excessive concern over the fact that we do not yet have extensive experience with the Maintenance Rule. We do have extensive experience with maintenance of licensed plants, and with its importance in maintaining both the functionality of SSCs and the licensing basis of the plants. We believe that the Maintenance Rule will be an enhancement of past maintenance practices. However, the Maintenance Rule is not a magic bullet, and some SSCs will lose their functionality from time to time. Nonetheless, the current licensing basis should be able to be maintained, as generally has been the case in the past.

I share Commissioner Rogers' concerns regarding the use of such terms as "ITLR system or structure function," "ITLR function," "ITLR screening requirements," "ITLR systems," etc. Although it may be appropriate to speak in general about matters or issues that are important to license renewal (ITLR), I question the utility of using the term as an adjective to distinguish specific systems, structures or functions. I cannot think of a system, structure, component or function important to license renewal that is also not just as important during the term of the initial license. Thus, I see the broad use of "ITLR" as an adjective only adding confusion rather than clarification to the discussion of license renewal. If such an identifier is necessary, which I question strongly, I concur in Commissioner Rogers' proposal to use "important to maintaining the CLB" (IMCLB).

The staff's rationale for sometimes referring to "systems, structures, and components" (SSCs), and at other times referring to "structures and components" (SCs) is not obvious to me. It is possible to have the individual components of a system fully functional, but the system not functional (e.g., due to improper or lack of tuning or balancing of the various functional components into a functional system). If the staff has a consistent rationale for referring to SCs sometimes and SSCs other times, it should be clearly described in the document.