



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

June 6, 1993

MEMORANDUM FOR: NRR Staff

FROM: Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

SUBJECT: PRIORITY DETERMINATION FOR NRR REVIEW EFFORTS

On April 29, 1988, and March 24, 1989, I issued procedures for a priority ranking system for NRR review tasks so that license actions and other office work efforts would be appropriately considered within the broad scope of all demands on office resources. The workload within NRR has changed with increased emphasis on the licensing of future reactors and license renewal. These changes require revisions to previously established priorities. Major NRR work activities fall within the categories of operating reactors, future reactors, and license renewal; review tasks will be assigned a priority within each of these categories. This memorandum provides the general framework for defining the priority of review activities within NRR and gives examples of review tasks within each priority for operating reactors. Because specific NRR staff has been dedicated to address the licensing of future reactors and license renewal, lists of examples of new tasks and their priority for future reactors and license renewal will be issued separately.

Basis for Determining Priority

The priority of a review task is determined primarily on the basis of safety significance, risk considerations, and operational impact. Four levels of priority are broadly defined in this memorandum. As a general rule, the safety significance of an issue should be guided by an assessment of its risk significance. Issues that affect components or systems that play a major role in accident scenarios should be considered high-priority issues. Significant contributors to initiating events that may result in challenges to the plant are high-priority assignments and should have appropriate resolution dates. However, identifying components and systems as safety or non-safety items is not, in itself, sufficient justification for assignment of priorities.

In some situations, priority is dictated by Commission or EDO directive resulting from policy considerations, or by statutory requirements such as deadlines imposed by rule or regulation. For example, policy considerations will have a significant bearing on the priority assigned to review tasks for future reactors and license renewal. All these factors must be considered in defining the priority of a particular review task.

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Definitions

- PRIORITY 1:
- Highly risk-significant safety concerns that require firm commitment of resources
 - Actions needed to prevent or require plant shutdown, allow restart, or prevent significant derate
 - Issues for which immediate action is needed for compliance with statutory requirements or Commission and EDO directives
- PRIORITY 2:
- Significant safety issues that do not rise to the level of immediate action but require near-term staff evaluation
 - Activities needed to determine the safety significance/generic implications of an operating event
 - Activities needed to support continued safe plant operation, reload analyses, or evaluation of necessary modifications or enhancements
 - Topical report reviews that will have extensive application in the short to mid-term, and whose application results in a significant safety benefit
 - Licensing reviews for which safety evaluation reports must be prepared within six months for construction permit, operating license, preliminary design approval, or final design approval
- PRIORITY 3:
- Issues of moderate to low safety significance that do not directly impact plant safety
 - Support for generic issue resolution and multiplant actions
 - Plant specific and topical report reviews with limited safety benefit but whose application offers operational or economic benefit
- PRIORITY 4:
- Items to be deferred or closed out without further staff review

Examples of review activities related to operating reactors that fall into each priority category are enclosed. This priority scheme is not meant to be a rigid framework. Some assignments may not fall into the categories described. Allocation of resources will be guided by the principle that issues of greatest safety significance and most operational impact, as well as those areas that the Commission has identified as important, will be

given a high priority and will have predictable review schedules. However, unlike past priority ranking systems, there is not necessarily a direct correlation between the assigned priority and the review completion date. A review of lower safety significance could be completed on a shorter schedule than a review that has more safety significance. Additionally, the Priority 4 category has been redefined for issues that management decides should be deferred or staff work discontinued.

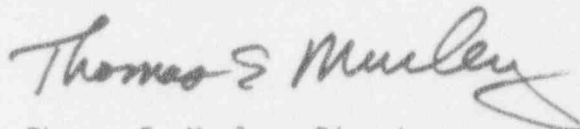
A recent review of plant-specific licensing tasks shows that there are a significant number of current reviews for which there are no immediate safety benefits or detriments associated with their approval; however, there may be significant economic benefits to these actions. In the past, these reviews have been assigned a low priority on a resource-available basis. The result of the assigned low priority is that possible economic benefits may not be made available to some licensees on a timely basis. The management of NRR is currently evaluating this policy and has formed a study group to provide a systematic, logical approach in scheduling these reviews and assigning staff resources.

Semiannual Review

The priority determinations will be reviewed semiannually at the NRR management meeting to determine how well the process meets the needs of this office. During the semiannual review, NRR managers will review discrepancies between work planned and work performed, and will assess the need for adjusting priority determinations.

This guidance applies to all NRR review efforts with a focus on issues related to operating reactors, and is effective immediately. Project managers and others who originated review activity are requested, therefore, to review existing priority classifications for all ongoing review tasks to assure that they are properly classified in accordance with this guidance.

As stated above, additional guidance for review of work activities for future reactors, license renewal, and operating reactor issues with low safety impact but significant economic benefit will be provided in the near future. Staff guidance for all priority determinations will be finalized in an NRR Office Letter following the completion of these separate efforts.



Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

Enclosure:
As stated

EXAMPLES OF ACTIONS/ISSUES WITHIN EACH PRIORITY CATEGORY
FOR OPERATING REACTORS

Priority 1: High Priority

Immediate action usually required; review completion date must be met; firm commitment of resources required.

- operating plant safety issues of very high significance including
 - event analysis of a serious operating incident
 - initial evaluation of unresolved safety questions to determine safety significance and generic applicability
 - unsatisfactory license operator qualification program
 - resolution of inspection team findings with high safety or safeguards significance
- bulletin development and review of responses
- significant non-compliance issues related to reactor vessel integrity
- 10 CFR 50.54(f) letter development and review of responses
- reactive team inspection support (AIT, IIT, OSTI, Special Inspection) and activities directly related to plant restart decisions
- support for court and licensing board hearings and response to interrogatories, 2.206 petitions, and EDO/Congressional ticket items
- incident response center support
- technical support for enforcement discretion or safety evaluations for license amendments or exemption requests for actions to prevent unnecessary reactor shutdown or startup delays or significant derating of the plant
- ACRS/Commission briefings
- technical support for orders issued to licensees
- support for escalated enforcement actions
- support for evaluating highly safety significant allegations and differing professional views/opinions
- licensee performance evaluations to support SALP, senior management meetings, EDO and Commissioner meetings with licensee
- reviews for lead plant or complete conversions to the improved STS

PRIORITY 2: High Priority Near-term

Short-term actions, minor changes to review completion date can be negotiated

- evaluation of operating events, inspection findings, and Part 21 reports to identify safety issues requiring action and assess licensee performance
- assistance to regions including consultation on TS interpretation, and task interface agreements
- significant safety, emergency planning and safeguards issues
- reload reviews
- development of multiplant issues of high safety significance and review of licensee responses
- decommissioning issues (exemptions, orders, reviews, etc.)
- TS interpretations that could impact plant operation
- power uprate proposals
- preparation of generic communications on issues of moderate safety significance
- review of 50.59 evaluations of highly safety-significant items (steam generator replacement, dry cask spent fuel storage installation)
- ISI/IST relief requests
- generic STS line item improvements
- pressurized thermal shock review and evaluation

PRIORITY 3: Low Priority

Longer-term actions, review completion date is flexible, items that are "marginal to safety"

- development of multiplant actions of lower safety significance and review of licensee responses
- surveillance program reviews
- non-power reactor issues if safety significant or essential to mission (operating license review, license renewal)
- spent fuel pool expansion reviews not meeting Priority 1 or 2
- piping as-built/design non-conformance reviews
- participation in ASME, ANS, and IEEE codes and standards activities

- topical report reviews and code case reviews which are required to demonstrate compliance with the regulations or provide operating flexibility/economic benefit and are expected to have wide reference ability
- safety-significant problems with the offsite dose calculations manual or radiological effluent technical specification, review of waste issues
- severe accident policy implementation
- support to RES on new generic issues of moderate safety significance
- seismic hazard characterization
- inservice inspection and testing program implementation and relief requests not affecting continued operations or restart
- proposed relief from previous commitments (e.g., EP, DCRDR, RG 1.97)
- voluntary upgrades to safety systems (e.g., analog-to-digital conversions)
- preparation/revision of inspection procedures, inspection manual chapters, NRC management directives
- requests for TS amendments required for economic advantage (e.g., changes in core and equipment operating limits, limiting conditions for operation and surveillance requirements, deletion of equipment that is no longer used, administrative TS changes)
- review of licensee self-initiated performance improvement programs developed in response to weaknesses in safety performance
- technical support for allegations and differing professional opinions of low safety significance

PRIORITY 4: Items That Can Be Deferred

Items that can be deferred or closed out without further staff review, e.g., issues not directly impacting plant safety, generic and confirmatory items with relatively low safety significance

- ASME code case reviews with limited applicability
- long-term followup of events or inspection findings with low safety significance
- preparation of generic communications that address items of low safety significance and administrative matters
- technical support for new generic issues of low safety significance
- changes to legally binding requirements (e.g., TS, license conditions) that are solely editorial