

NOTATION VOTE RELEASED TO THE PDR

RESPONSE SHEET 6-9-94 PJ  
date initials

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION  
FROM: COMMISSIONER ROGERS  
SUBJECT: SECY-94-066 - EVALUATION OF ISSUES DISCUSSED  
IN SECY-92-314, "CURRENT LICENSING BASIS FOR  
OPERATING PLANTS"

APPROVED <sup>IN PART</sup> ✓ <sub>KCC</sub> DISAPPROVED <sup>IN PART</sup> ✓ <sub>KCC</sub> ABSTAIN \_\_\_\_\_  
NOT PARTICIPATING \_\_\_\_\_ REQUEST DISCUSSION \_\_\_\_\_

COMMENTS: See attachment

Kenneth C. Rogers  
SIGNATURE

May 4, 1994  
DATE

RELEASE VOTE 1/1

WITHHOLD VOTE 1/1

ENTERED ON "AS" YES ✓ No \_\_\_\_\_

DFOR  
1/6

Commissioner Rogers Comments on SECY-94-066

I approve the staff's recommendations contained in SECY-92-314 that the Commission:

- 1.a. end the CLB volunteer program;
  - c. not revise interpretation of the FSAR update rule to include entire CLB;
2. Not adopt the OPP CLB recommendations in OPP-92-02; and
3. Make the recommended papers publicly available.

However, I do not approve recommendation 1.b. "not require licensees to compile the CLB within a single document" (Note that SECY 92-314 did not limit the CLB to a single document). I continue to believe that it would be beneficial to both the licensees and the NRC if there was a well managed CLB. This should include, at a minimum, a set of cross references that identifies the various components of the CLB and the location of their respective documents. Just how each licensee chooses to identify, control, and manage the CLB should be left to the licensee's discretion.

In response to the recommendations of the Regulatory Review Group (RRG) the staff is planning to address many of the concerns raised by the staff in SECY-92-314 and by OPP (See SECY-94-003, Enclosure 1, RRG Implementation Plan). I think that this effort should be given the highest priority including:

- Topic 7. the provision of additional guidance on what constitutes a commitment and the types of controls to be placed on changing commitments.
- Topic 8. reconsideration of the CLB definition; and
- Topic 9. reconsideration of the design basis definition, as appropriate.

KCR  
5/4/94