



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

February 20, 1990

MEMORANDUM FOR: James M. Taylor  
Executive Director  
for Operations

FROM: Edward L. Jordan, Chairman  
Committee to Review Generic Requirements

SUBJECT: MINUTES OF CRGR MEETING NUMBER 178

The Committee to Review Generic Requirements (CRGR) met on Thursday, January 25, 1990 from 1:00-5:30 p.m. The following items were addressed at the meeting:

1. T. King (RES) and W. Beckner (RES) presented for CRGR review a proposed Commission paper and generic letter supplement on containment performance improvement as related to Individual Plant Examinations. The Committee did not complete its review of this matter. The staff agreed to revise the Commission paper and generic letter to identify dominant vulnerabilities observed for various containment types with examples of measures to affect those vulnerabilities rather than emphasis on "fixes" since the staff did not have cost beneficial generic fixes. The revised documents would then be circulated to CRGR members on a negative consent basis, with no further meeting planned. This matter is discussed in Enclosure 2.
2. T. King (RES) and M. Jamgochian (RES) presented for CRGR review a proposed rulemaking package (for public comment) entitled "Emergency Preparedness Rulemaking Relating to Part 52 Licensing of Nuclear Power Plants." The Committee supported the staff's logic that the emergency preparedness plan and exercise criteria are material to a licensing decision but the exercise is not. The Committee recommended forwarding the package to the EDO subject to a number of revisions. This matter is discussed in Enclosure 3.
3. S. Newberry (NRR) and D. Lasher (NRR) presented for CRGR review a draft generic letter clarifying the staff position on the vendor interface issue (Generic Letter 83-28, Item 2.2.2). The Committee recommended in favor of issuing the generic letter subject to some revisions, including revision of the generic letter to reflect two classes of treatment for vendors rather than three and changing the time for response to 180 days. This matter is discussed in Enclosure 4.

In accordance with the EDO's July 18, 1983 directive concerning "Feedback and Closure of CRGR Reviews," a written response is required from the cognizant office to report agreement or disagreement with the CRGR recommendations in these minutes. The response, which is required within five working days after

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receipt of these minutes, is to be forwarded to the CRGR Chairman and if there is disagreement with CRGR recommendations, to the EDO for decisionmaking.

Questions concerning these meeting minutes should be referred to Dennis Allison (492-4148).

Original Signed By:  
C. J. Heltemes, Jr.

Edward L. Jordan, Chairman  
Committee to Review Generic  
Requirements

Enclosures:  
As stated

cc w/enclosures:  
Commission (5)  
SECY  
J. Lieberman  
P. Norry  
D. Williams  
Regional Administrators  
CRGR Members

Distribution: w/o enclosures

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M. Taylor (w/enc.)  
W. Minners (w/enc.)  
W. Beckner (w/enc.)  
M. Jamgochian (w/enc.)  
A. Thadani (w/enc.)  
S. Newberry (w/enc.)  
R. W. Houston (w/enc.)  
E. Jordan (w/enc.)  
J. Heltemes (w/enc.)  
J. Conran (w/enc.)  
D. Allison (w/enc.)

OFC	: AEOD:CRGR	: AEOD:DD	: C/CRGR:AEOD	:	:	:
NAME	: DA11ison:cg	: CJHeltemes	: ELJordan	:	:	:
DATE	: 2/4/90	: 2/10/90	: 2/10/90	:	:	:

ENCLOSURE 1

ATTENDANCE LIST  
FOR  
CRGR MEETING NO. 178

JANUARY 25, 1990

CRGR MEMBERS

E. Jordan  
J. Moore  
J. Sniezek  
D. Ross  
L. Reyes  
G. Arlotto

NRC STAFF

J. Heltemes  
J. Conran  
D. Allison  
T. King  
W. Beckner  
L. Soffer  
T. Cox  
E. Chow  
N. Lauben  
J. Monninger  
W. Schwink  
D. Houston  
J. Flack

Enclosure 2 to the Minutes of CRGR Meeting No. 178  
Proposed Supplement to IPE Generic Letter on CPI Results

January 25, 1990

TOPIC

T. King (RES) and W. Beckner (RES) presented for CRGR review a proposed Supplement to Generic Letter No. 88-20, transmitting to licensees insights gained from the NRC staff's Containment Performance Improvement (CPI) Program, for consideration in licensees' independent plant examinations (IPEs) for severe accident vulnerabilities. Briefing slides used by the staff to guide their presentation and discussion with the Committee at this meeting are enclosed (Attachment 1).

BACKGROUND

The documents submitted to CRGR for review in this matter were transmitted by memorandum dated January 3, 1990, E. S. Beckjord to E. L. Jordan; that initial review package included the following documents:

- a. Draft Commission paper (undated), "Recommendations of Containment Performance Improvement Program for Plants With Mark II, Mark III, Ice Condenser, and Dry Containments"
- b. Proposed Generic Letter Supplement (undated), "Consideration of Containment Performance Improvement Insights in the Individual Plant Examination for Severe Accident Vulnerabilities - 10 CFR 50.54(f) - Generic Letter No. 88-20, Supplement 2"

CONCLUSIONS/RECOMMENDATIONS

As a result of their review of this matter, including the discussions with the staff at this meeting, the Committee recommended in favor of issuance of the proposed generic letter supplement, subject to a number of modifications discussed with the staff at this meeting, as follows:

1. The proposed generic letter supplement referred to a planned NUREG report on CPI program results which the staff expected to be available at about the time the supplement is expected to be issued; but not even an early draft of that report was provided to CRGR in the review package for this item. The Committee would not support issuance of the proposed supplement as written without reviewing the planned NUREG; they recommended instead that the proposed supplement be revised to (a) announce completion of the staff's CPI program, with no new generic requirements for plant modification having been identified, and (b) provide to licensees now, in summary form, important insights gained from the generic CPI studies, for consideration in licensees' plant-specific IPEs as they deem appropriate.



The revised supplement should also note that the staff plans to publish at a later date final versions of the technical reports on which the insights are based, providing additional technical detail in the areas addressed to licensees' attention in the supplement. The Committee requested that the staff provide an information briefing to CRGR on the final reports prior to issuing them; the staff agreed to do so.

2. As a general comment, the Committee felt that, in current form, the discussion of insights included in proposed supplement suggests too strongly additional requirements (going beyond what has been agreed to previously as the approved scope of the IPE effort) for detailed cost-benefit analyses of alternative means of coping with severe accidents. The Committee recommended that the tone of the proposed supplement should be modified to better reflect the original intent of the IPE effort, i.e., to encourage licensees to evaluate their facilities for severe accident vulnerabilities and to voluntarily improve severe accident management capability based on the licensees' improved understanding of their facilities in the beyond-design-basis-accident regime. The Committee recommended several specific changes to the proposed supplement in this context (see below).
3. The Committee recommended that the reference to 10 CFR 50.54(f) should be deleted from the proposed supplement, since no specific licensee response is expected or intended at this time.
4. The Committee recommended specific changes to the package as follows:
  - a. At page 2 of the draft Commission paper, second full paragraph, revise the wording to reflect the staff's intent to publish the final technical reports referred to in 1 above.
  - b. At page 5 of the draft Commission paper, in the paragraph at the top of the page that continues from page 4, revise the last sentence to reflect more clearly that the intent is not for licensees to do a detailed analysis of alternatives to venting.
  - c. At page 6 of the draft Commission paper, in the paragraph at the top of the page that continues from page 5, revise the last sentence to read as follows:

"The staff recommends that the vulnerability to interruption of power to the hydrogen igniters be evaluated on a plant-specific basis as part of the IPE."
  - d. At page 7 of the draft Commission paper, second full paragraph, revise the last sentence to read as follows:

"The staff recommends that the vulnerability to interruption of power to the hydrogen igniters be evaluated on a plant-specific basis as part of the IPE for ice condenser plants."

- e. At page 1 of the proposed generic letter supplement, second full paragraph, revise the first sentence to read as follows:

"Four specific insights are believed to be important enough to bring to the attention of licensees, for use as they determine appropriate in the IPE..."

- f. At page 2 of the proposed generic letter supplement, first full paragraph, revise the third sentence to read as follows:

"Licensees with Mark III containments are expected to evaluate vulnerability to interruption of power to the hydrogen igniters as part of the IPE."

- g. At page 2 of the proposed generic letter supplement, under "...Ice Condenser Containments," revise the second sentence to read as follows:

"Licensees with ice condenser containments are expected to evaluate vulnerability to interruption of power to the hydrogen igniters as part of the IPE."

- h. At page 2 of the proposed generic letter supplement, next to the last full paragraph, revise the last sentence to read as follows:

"Licensees with dry containments are expected to evaluate containment vulnerabilities to hydrogen combustion and the need for improvements, including accident management procedures, as part of the IPE."

RES will coordinate with the CRGR staff, and provide a revised package to CRGR for a final review prior to issuance of the IPE generic letter supplement.

**RECOMMENDATIONS OF THE CONTAINMENT PERFORMANCE  
IMPROVEMENT PROGRAM FOR PLANTS WITH MARK II,  
MARK III, ICE CONDENSER, AND DRY CONTAINMENTS**

**PRESENTED TO**

**CRGR**

**JANUARY 25, 1990**

**WARREN MINNERS  
WILLIAM BECKNER  
DIVISION OF SAFETY ISSUE RESOLUTION  
OFFICE OF NUCLEAR REGULATORY RESEARCH**

## PURPOSE OF BRIEFING

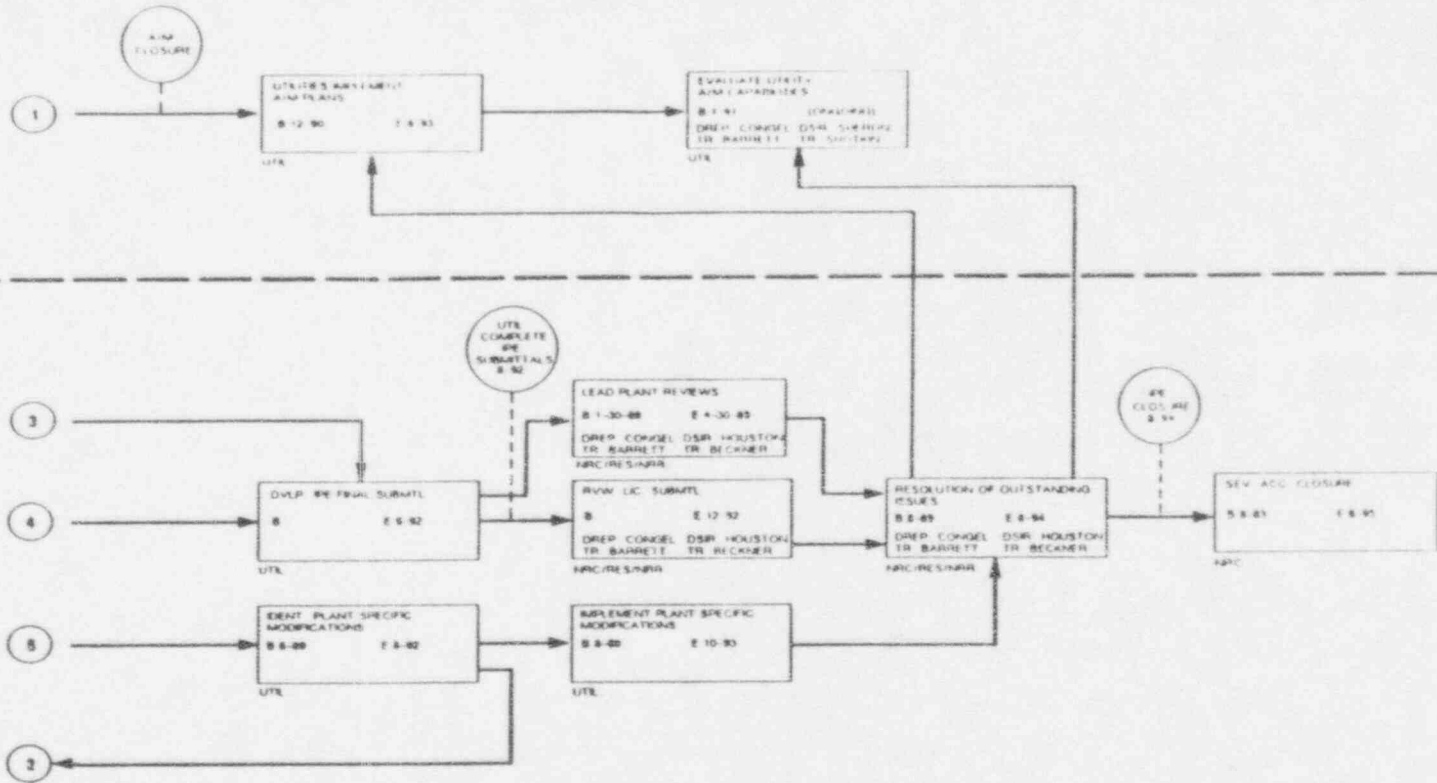
**TO REQUEST CRGR REVIEW AND APPROVAL OF FINAL RECOMMENDATIONS OF THE CONTAINMENT PERFORMANCE IMPROVEMENT PROGRAM (CPI) FOR ALL REMAINING CONTAINMENT TYPES.**

**SPECIFICALLY, APPROVAL TO GO FORWARD WITH A COMMISSION PAPER AND DRAFT GENERIC LETTER THAT WOULD REQUEST LICENSEES TO EVALUATE SPECIFIC IMPROVEMENTS AS PART OF THE INDIVIDUAL PLANT EXAMINATION (IPE).**



# SEVERE ACCIDENT PROGRAM - MASTER PLAN

IMPROVED  
PLANT  
OPERATIONS  
PROGRAMS



CONTAINMENT  
PERFORMANCE  
IMPROVEMENTS  
PROGRAM



## BACKGROUND

**THE STAFF PRESENTED RECOMMENDATIONS FOR MARK I CONTAINMENT IMPROVEMENTS TO THE COMMISSION IN SECY-89-017. RECOMMENDATIONS INCLUDED:**

- **HARDENED VENT**
- **ALTERNATE WATER TO CONTAINMENT AND VESSEL**
- **ADS IMPROVEMENTS**
- **IMPROVED PROCEDURES (EPG REVISION 4)**
- **ACCELERATE STAFF ACTIONS ON SBO RULE**

**RECOMMENDATIONS WERE BACKED BY DETAILED COST-BENEFIT AND REGULATORY ANALYSES.**

**ACRS STRONGLY RECOMMENDED THAT THE STAFF RECOMMENDED IMPROVEMENTS BE EVALUATED ON A PLANT-SPECIFIC BASIS AS PART OF THE IPE.**

BACKGROUND (CONT.)

COMMISSION DIRECTED THE STAFF TO IMPLEMENT THE HARDENED VENT THROUGH PLANT-SPECIFIC BACKFITS FOR ALL PLANTS NOT VOLUNTARILY MAKING THIS IMPROVEMENT. OTHER IMPROVEMENTS WERE TO BE FURTHER EVALUATED AS PART OF THE IPE.

STAFF INITIATED IMPLEMENTATION OF THE HARDENED VENT THROUGH GL-89-16 (9/1/89). PLANT-SPECIFIC REGULATORY ANALYSES FOR PLANTS NOT VOLUNTEERING AND A DRAFT ENVIRONMENTAL ASSESSMENT COMPLETED.

REQUEST TO EVALUATE OTHER MARK I IMPROVEMENTS AS A PART OF THE IPE TRANSMITTED IN SUPPLEMENT 1 TO IPE GL-88-20 (8/29/89).

## APPROACH FOR OTHER CONTAINMENT TYPES

**CPI PROGRAM APPROACH FOR OTHER CONTAINMENT TYPES HAS BEEN CHANGED FROM THE MARK I EFFORT:**

- **REDUCED EMPHASIS ON DETAILED COST-BENEFIT TO JUSTIFY SPECIFIC GENERIC REQUIREMENTS.**
- **DIRECTED PRIMARILY TOWARD INSIGHTS ON CONTAINMENT VULNERABILITIES AND POTENTIAL IMPROVEMENTS THAT MAY PROVE BENEFICIAL WHEN EVALUATED ON A PLANT-SPECIFIC BASIS AS PART OF THE IPE.**

**THIS REVISED APPROACH WAS BASED ON:**

- **NO IMPROVEMENTS THAT WOULD BE OBVIOUSLY COST-BENEFICIAL ON A GENERIC BASIS.**
- **DIRECTION OF THE COMMISSION AND ACRS RECOMMENDATIONS REGARDING THE RECOMMENDED MARK I IMPROVEMENTS.**

## APPROACH FOR OTHER CONTAINMENT TYPES (CONT.)

### **SPECIFIC TECHNICAL WORK PERFORMED:**

- **REVIEW/SUMMARY OF EXISTING PRA INSIGHTS.**
- **LIMITED SIMPLIFIED CONTAINMENT EVENT TREES EVALUATING IMPACT OF IMPROVEMENTS.**
- **SUPPLEMENTARY CONTAINMENT CALCULATIONS EVALUATING CONTAINMENT RESPONSE/IMPACT OF IMPROVEMENTS.**
- **VERY LIMITED, QUALITATIVE COST ANALYSIS BASED ON EXISTING INFORMATION.**

## CPI PROGRAM RECOMMENDATIONS FOR OTHER CONTAINMENTS

**NO GENERIC REQUIREMENTS TO BE RECOMMENDED.**

**VULNERABILITIES AND ASSOCIATED IMPROVEMENTS THAT SHOULD BE SPECIFICALLY EVALUATED ON A PLANT-SPECIFIC BASIS AS PART OF THE IPE FOR EACH CONTAINMENT TYPE HAVE BEEN IDENTIFIED. A SUPPLEMENT TO THE IPE GENERIC LETTER WOULD BE ISSUED REQUESTING THIS EVALUATION, CONSISTENT WITH WHAT WAS DONE FOR MARK I RECOMMENDATIONS.**

**TECHNICAL REPORTS FROM THE CPI PROGRAM WILL BE MADE AVAILABLE TO LICENSEES TO SERVE AS INSIGHTS AND TO ASSIST IN EVALUATION OF VULNERABILITIES AND POTENTIAL IMPROVEMENTS.**

**NO ACTION TAKEN ON OTHER CONTAINMENT VULNERABILITIES DUE TO ONGOING RESEARCH (EG., SARP STUDYING DCH AND DEPRESSURIZATION).**

VULNERABILITIES/IMPROVEMENTS RECOMMENDED FOR  
CONSIDERATION IN THE IPE

MARK II - VENTING AND ALTERNATE WAYS TO  
COOL SUPPRESSION POOL.

- MARK I IMPROVEMENTS.

MARK III - BACKUP POWER TO H<sub>2</sub> IGNITERS.

- MARK I IMPROVEMENTS.

ICE CONDENSER - BACKUP POWER TO H<sub>2</sub> IGNITORS.

DRY CONTAINMENT - H<sub>2</sub> DETONATION (NUREG-1150  
SCREENING METHOD  
SUGGESTED).



PLANNED CPI PROGRAM TECHNICAL REPORTS (NUREG/CR)

	MARK II	MARK III	ICE	DRY
CHARACTERIZATION	INEL   COMBINED REPORT	INEL   COMBINED REPORT	BNL	BNL
ENHANCEMENTS	INEL	INEL	INEL	INEL
PARAMETRICS	ORNL--COMBINED--	ORNL	SNL	SNL

## IMPACT OF REVISED APPROACH ON IPE

**THE IMPACT OF THE REVISED CPI APPROACH IS THAT THE BURDEN OF DETERMINING THE NEED FOR CERTAIN CONTAINMENT IMPROVEMENTS HAS BEEN PLACED ON THE LICENSEE, CONSISTENT WITH OTHER ASPECTS OF THE IPE PROCESS.**

**THIS WILL PLACE A GREATER BURDEN ON THE STAFF TO REVIEW THESE ISSUES ON A PLANT-SPECIFIC BASIS.**

**THIS INFORMATION NEEDS TO BE COMMUNICATED TO LICENSEES QUICKLY SINCE THE IPE PROCESS HAS ALREADY STARTED.**

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ISSUE SHEET FOR CRGR AGENDA ITEM

CRGR Meeting No. 178 - January 25, 1990

Proposed IPE Generic Letter Supplement  
on  
Consideration of CPI Program Insights in the IPE

ISSUES/QUESTIONS

1. As a first general comment, the proposal to move into the IPE, for treatment by individual licensees, the difficult containment performance issues (involving complex and not yet well understood or characterized phenomenology and methodology) that were initially intended to be addressed by the staff in the CPI program, appears to me to expand significantly the scope of the IPE program that was reviewed by CRGR and agreed upon finally as the basis for issuing GL 88-20. This seems so much the case that the accuracy of last sentence in the proposed generic letter supplement should be seriously questioned. The staff has indicated to me that they consider the actions recommended in this proposal to be consistent with the direction taken by the Commission in their final disposition of the staff's recommendations on Mark I containment performance improvements. One might agree that is true with regard to the staff's current proposal that Mark II and Mark III licensees address in their IPEs the same non-venting (Mark I) issues that were included in Supplement 1 to the IPE letter; but the other elements of the staff's current proposal seem to go well beyond the precedent established by the Commission's action in the Mark I case. Accordingly, a much different CRGR package seems warranted here; specifically, the package should acknowledge that the proposed treatment of containment issues by individual licensees in their IPEs does add significantly to licensee burdens associated with the IPE effort, and the justification for such increased licensee burdens should be provided in the package in accordance with applicable CRGR Charter requirements.
2. The inclusion of the bibliography in Table 1 of the package could be construed as adding to the List of References included in NUREG-1335, Appendix A provided to licensees earlier, which licensees were expected to use/apply in the performance of their IPEs. This lends further to the impression that the proposal adds significantly to the scope of what is intended by the staff to be addressed substantively in IPEs, and the licensee burden involved. The staff has indicated to me that only one of the documents referenced in Table 1 (NUREG/CR-5275) is actually intended to be used by licensees in the performance of IPEs; the other documents listed in Table 1 are intended only as background information. This point should be discussed with the staff, and the staff's intent in this regard should be made clear explicitly in the package, to avoid possible confusion on this point by licensees.

With regard to NUREG/CR-5275 specifically, the staff did not include that document in the package. The Committee should request, therefore, that the staff describe what will be involved in licensees applying that

methodology to evaluate hydrogen burn/detonation potential and to assess its possible consequences, in order to get some indication of the level of additional effort required by licensees if this staff proposal is approved.

3. The "technical reports" mentioned on p.2 of the draft Commission Paper in the package, that are expected to be available at about the time that the proposed supplement is ready for issuance, are a potential source of misunderstanding regarding the staff's intent of what is expected of licensees in treating CPI-related containment performance issues in IPEs. The Committee should consider whether the proposed generic letter supplement should be issued without CRGR review of the those supporting technical reports.
4. The staff recommends that Mark II licensees evaluate venting as a part of their IPE process. To be consistent with the approach taken by the Commission in the case of Mark I's, the Committee may wish to consider recommending that the staff be responsible for backfit analyses to determine whether there are cost effective venting-related modifications that should be made to the Mark II plants.

With regard to the recommendation (at the top of p.5 of the draft Commission Paper) that Mark II licensees investigate alternatives to venting in the IPE context, NRR (among others) has questioned whether this approach is consistent with the staff's position in the recent litigation of SAMDA issues in licensing hearings. The Committee may wish to question the staff to assure that this aspect of the proposed package has been properly coordinated by the staff.

5. The staff recommends that licensees of plants with Mark III, Ice Condenser, and large dry containments address in their IPEs potential vulnerabilities to hydrogen burns or detonations. Mark III and Ice Condenser plant licensees would be required to evaluate specifically, in the Station Blackout (SBO) context, the cost-effectiveness of backup power supplies for hydrogen igniters; and owners of dry containments would evaluate the potential for damage to important equipment due to localized hydrogen detonations.

The Committee should discuss with the staff in some detail the bases for these recommendations to better understand their justification. Specifically, are these recommendations consistent with or strongly indicated by latest NUREG-1150 conclusions regarding the specific accident sequences, plant damage states, and containment types involved, and their respective contributions to conditional probability of early containment failure and overall risk compared to the Commission's safety goal objectives?

Enclosure 3 to the Minutes of CRGR Meeting No. 178

Emergency Preparedness Rulemaking Relating to Part 52  
Licensing for Nuclear Power Plants

January 25, 1990

TOPIC

T. King (RES) and M. Jamgochian (RES) presented the subject proposed rulemaking (for public comment) for CRGR review. Although the main purpose was to correct a number of problems in emergency preparedness regulations for Part 52 licensing, the proposed rulemaking would correct problems for Part 50 licensing as well. Primarily, it would indicate that licensing decisions were to be based on review of emergency plans (as well as emergency preparedness criteria to be included in the combined license in the case of Part 52 licenses). An exercise would no longer be needed to make a licensing decision. The initial exercise would be treated as part of the startup testing program. Furthermore, only one exercise would be required during the startup test program (if the results were satisfactory).

With regard to state and local government plans, the regulations already specified standards that described how a Part 50 operating license applicant could show and the Commission could find that licensing should proceed in the event of state or local government non-participation. One of the proposed changes would specify similar standards to describe how a Part 50 operating reactor could continue operation in the event of non-participation. For 10 CFR Part 52 licensing, the proposed changes would indicate that an applicant for a combined license must (or may) submit a utility prepared backup plan as an alternative to the preferable state and local plans. This, in combination with the realism doctrine published by the Commission in 1987, was expected to allow a combined licensee to proceed in the event of non-participation.

The slides used by the staff in its presentation are provided as Attachment 1 to this enclosure.

BACKGROUND

An initial package was transmitted on January 3, 1990 by a memorandum (undated) from E. Beckjord to E. Jordan. The package included:

1. Draft Commission paper with Proposed Rule on Emergency Preparedness
2. Environmental Assessment for Proposed Rule Amending Emergency Preparedness Regulations
3. Discussion of Backfit Factors

A revised package was transmitted by a note from T. L. King to CRGR members dated January 19, 1990. The revised package included the same three elements.

In addition, at the meeting RES provided the following:

1. Regulatory Analysis (Attachment 2 to this enclosure)

#### CONCLUSION/RECOMMENDATION

The Committee supported the staff's logic that the emergency preparedness plan and exercise criteria are material to a licensing decision but the exercise is not. The Committee recommended forwarding the package to the EDO, subject to a number of revisions discussed below. A marked up copy of the revised package reflecting the Committee's comments should be reviewed by the CRGR staff prior to forwarding. The recommended changes were as follows:

1. General
  - a. Where the documents say emergency plans and criteria are material to the licensing decision, a statement should be added to say "but exercises are not."
  - b. The term "fundamental flaw" should be defined in the Commission paper and the rule.
  - c. The term "inadequate state or local plans" should be substituted for the term "lack of cooperation."
  - d. Where exercises are said to confirm adequate training and emergency plan implementation, delete "training and."
  - e. The option of allowing the initial exercises during power ascension testing on a case-by-case basis should be deleted.
  - f. The initial exercise should not be restricted to after fuel loading.
2. Commission Paper
  - a. On page 1, Background, eliminate the term "unclarity."
  - b. On page 4, last paragraph, delete "uncovery" and delete "during an exercise." The discussion should be based on the premise that any fundamental flaws would be revealed by review of the emergency plan rather than by the inspection just prior to the exercise.
  - c. On page 5, top, delete "Thus, the exercise would not be permitted...plan."
  - d. On page 5, second full paragraph, delete the statement that the initial exercise may be conducted during power ascension.
  - e. On page 5, third full paragraph,
    - (i) first sentence, delete "preoperational and." In item (2) say "provide additional assurance"



- (ii) last sentence, delete "should."
  - f. On page 5, fourth paragraph, first sentence, say "...testing is confirmatory in nature and consists of..."
  - g. On page 6, top, say "...anticipated operations and transients."
  - h. On page 6, first full paragraph,
    - (i) first sentence, say "...test program is ~~should-be~~ designed to....." Delete "must."
    - (ii) delete last sentence.
  - i. On page 7, top,
    - (i) delete item 2.
    - (ii) item 4, say "not affect emergency planning efforts."
  - j. On page 8, item 2, say "...part of the initial startup testing program. Emergency exercises are not required for any licensing...."
  - k. On page 8, delete the statement about CRGR review.
  - l. On page 8, Recommendations, item c, delete "substantive."
  - m. Regarding submittal of backup plans, the staff should recommend either alternative 1 or 2 as being preferable in the Commission paper.
3. Statement of Considerations
- a. The reference to Susquehanna on page 3 should be checked. It may be inappropriate if that case was not contested.
  - b. The discussion of the Chemical Waste Management case on page 6 (or at least the second sentence of it) should be deleted.
  - c. The discussion of experience on the top half of page 15 should be reworded to indicate that the emergency plan review and the licensing hearing provide what is needed for a licensing decision.
  - d. Similar rewording should be performed for the discussion at the bottom of page 15 and the top of page 16.
  - e. The discussion at the top of page 18 should be clarified.
  - f. The characterization of some officials as apathetic should be deleted at the bottom of page 22.
  - g. The prior theory on fundamental flaws should be characterized as no longer valid rather than as questionable on page 20.

- h. On page 26, the same changes as were made in the Commission paper should be made for the Pro's and Con's of Alternatives 1 and 2.
- i. A number of editorial comments were made during the meeting which are not repeated here.

4. Proposed Rules

- a. On page 33, 50.47, say "can and will be implemented."
- b. On page 34, bottom, typographical errors and misalignments should be corrected.

In addition to the changes described above, the following points were noted during the meeting:

1. OGC had not yet concurred, but the package was getting close to achieving concurrence. OGC was in agreement with the general thrust of the package.
2. OGC and some CRGR members would be concerned about issuing the proposed rule without having first completed a staff survey of significant problems found in exercises because the results of that survey were expected to support the conclusion that exercises are not needed to make licensing decisions. However, the staff and other CRGR members believed the conclusion could be based on experience and knowledge made without first completing the survey.
3. The staff intended to publish guidance on the emergency planning criteria. (Such criteria were to be included in combined licenses under 10 CFR Part 52.)
4. It might be necessary to make some changes to the NRC/FEMA review agreements if the proposed new rules were adopted.
5. This action was not considered to be a backfit.

EMERGENCY PLANNING RULE CHANGE

FOR PART 52 LICENSING

FOR CRGR JANUARY 25, 1990

PRESENTATION

COMMISSION DIRECTION

SRM (COMKC-89-8) DATED SEPTEMBER 12, 1989.

THE COMMISSION DIRECTED THE STAFF, ON A HIGH PRIORITY BASIS, TO DEVELOP A RULE CHANGE WHICH WOULD DETERMINE WHETHER EXERCISE TIMING AND FREQUENCY CAN BE DETACHED FROM THE AUTHORIZATION TO OPERATE A NUCLEAR POWER PLANT UNDER A COMBINED LICENSE.

EVENTS PROMPTING CHANGE

1. THE 1982 EXERCISE RULE CHANGE WHICH STATED THAT EXERCISES WERE PART OF THE OPERATIONAL INSPECTION PROCESS.
2. IN UCS VS. NRC (D.C. CIRC., 1984).
3. CHEMICAL WASTE VS. EPA (D.C. CIRC., 1989).
4. PROMULGATION OF THE REALISM DOCTRINE (1987).
5. PROMULGATION OF 10 CFR PART 52 (1989).

## ISSUES

### ISSUE 1.

IN LIGHT OF THE CURRENT STATUS OF EMERGENCY PLANNING, HOW SHOULD THE COMMISSION NOW TREAT THE RESULTS OF EXERCISES IN MAKING THE DETERMINATION OF WHETHER TO ISSUE AN OPERATING LICENSE OR A COMBINED OPERATING LICENSE.

### ISSUE 2.

HOW SHOULD THE COMMISSION ADDRESS THE EMERGENCY PLANNING REQUIREMENTS WHERE THERE IS A LACK OF COOPERATION OR WITHDRAWAL OF STATE AND LOCAL GOVERNMENT EMERGENCY PLANNING COOPERATION FOR OPERATING PLANTS, AND FOR THOSE RECEIVING COMBINED OPERATING LICENSES (PART 52).



SUMMARY OF PROPOSED CHANGES

1. ESTABLISHES THAT EMERGENCY PLANS AND EXERCISE ACCEPTANCE CRITERIA ARE MATERIAL TO A LICENSING DECISION THUS REMOVING THE NEED TO CONDUCT AN EXERCISE PRIOR TO ISSUING A COMBINED OPERATING LICENSE (PART 52).
  
2. FOR THOSE RECEIVING AN OPERATING LICENSE (PART 50), THE EMERGENCY PLANNING EXERCISE IS NOW PART OF THE INITIAL STARTUP TESTING PROGRAM AND TRAINING PROGRAM AND THEREFORE NOT REQUIRED FOR ANY LICENSING DECISION.
  
3. THE USE OF THE REALISM DOCTRINE IS EXPANDED TO OPERATING REACTORS AND FOR THOSE RECEIVING A COMBINED OPERATING LICENSE (PART 52).

## STATUS AND SCHEDULE

- PROPOSED RULEMAKING PACKAGE DRAFTED AND INTEROFFICE REVIEW COMPLETED.
  - o TO ACRS AND CRGR - EARLY JAN. 1990
  - o CRGR - LATE JAN.
  - o TO EDO - 03/01/90
  - o TO COMMISSION - 03/30/90
  
- FINAL RULE:
  - o ACRS/CRGR REVIEW - 01/91
  - o TO EDO - 02/91
  - o TO COMMISSION - 03/91

## REGULATORY ANALYSIS

### Statement of the Problem:

In a memorandum dated June 29, 1989 from EDO to the Commission, the staff provided an analysis and review of the emergency planning regulations and proposed revisions. In this memo the EDO stated that "... the staff [has] identified a potential problem regarding governments withdrawing from participation in emergency planning, specifically participation in emergency planning exercises which would be required before licensing and periodically thereafter during construction and operation." Additionally, "rulemaking could clarify the application of the "realism" provisions of 10 CFR 50.47(c)(1) to plants with operating licenses. Other changes may be needed to deal with the issue of State or local government withdrawal near the completion of construction. Another issue for which rulemaking may be needed relates to those portions of the plan which cannot be exercised prior to issuance of the combined license for future plants under 10 CFR 52. For example, although a pre-licensing exercise could be developed to include the major observable elements of the onsite and offsite plans, some aspects of the plans would be difficult to demonstrate prior to construction of the facility (e.g., the control room and emergency response facilities). If portions of the plans were exercised for the first time in post-licensing tests, the results might be subject to an opportunity for hearing relatively late in the process."

### Objective:

The objective of the proposed amendments is to resolve the following two issues:

Issue 1. In light of the current status of emergency planning, how should the Commission now treat the results of exercises in making the determination of whether to issue an operating license under Part 50 or a combined operating license under 10 CFR 52.

Issue 2. How should the Commission address the emergency planning requirements where there is a lack of cooperation or withdrawal of state and local government emergency planning cooperation for operating plants, and for those receiving combined operating licenses (Part 52)?

### Alternatives Considered:

For issue 1 the staff considered the following three alternatives, (1) to leave the existing rules unchanged whereby exercises are considered material to a licensing decision (consistent with UCS and NRC, 735 F.2d 1437 (D.C. Circ., 1984); (2) to determine what elements of the exercises are material to licensing, conduct those elements in an exercise, litigate these results and proceed with issuing an operating license; or (3) determine that exercises are not material to licensing and, therefore, need not be conducted prior to issuing an operating license or a combined license. Exercises would then be conducted as part of the initial startup testing and training programs.

For issue 2 the following three alternatives were considered (1) maintain status quo (i.e. realism rule only applies to plants receiving new operating licenses under 10 CFR 50), (2) require a licensee (licensed under 10 CFR 52) to submit his own plan to serve as a backup to the preferable state and local plan and (3) allow a licensee (Licensed under 10 CFR 52) the option of submitting his own plan to serve as a backup to the preferable state and local plan.

### Comparison of Alternatives

Each of the alternatives under issues 1 and 2 were evaluated in a qualitative sense to determine the option with the potential to contribute most to a predictable licensing process without adversely impacting the risk to public health and safety. Predictability in the licensing process is expected to have a positive impact on licensees by reducing uncertainty (both financial and regulatory) and by helping to ensure a licensee's resources are applied in a fashion which will contribute more effectively to safety. Quantitative analyses of the options were not made because of the large uncertainty and ranges possible, particularly with respect to cost.

Tables 1 and 2 show the impact, change in risk and other factors associated with each option for issues 1 and 2, respectively.

Regarding issue 1, the staff chose alternative 3 because it provides the largest step forward in providing a more predictable licensing process. In promulgating Part 52 regulations, the Commission's goal was to have a procedure framework in place for the consideration of standardized designs and to make it possible to resolve safety and environmental issues before plants are built, rather than after. This proposed rule change resolves emergency planning concerns while meeting this Commission goal. Specifically, alternative 3 meets the overall intent of Part 52 licensing in that it provides for early resolution of licensing issues which the Commission believes will enhance the safety and reliability of nuclear power plants, while at the same time enhancing public participation by providing the public the opportunity to provide meaningful comments before a proposed nuclear power plant has proceeded through construction.

Regarding issue 2, the staff at this time considers options (2) and (3) to have equal merit and is, therefore, requesting comments on both options. Option (1) was judged undesirable because it would not resolve the potential problem of state and local government withdrawal, in emergency planning.

The impact and change in risk for the options chosen can be summarized as follows:

### Impact Considerations

#### o NRC

The additional resource burden on the NRC as a result of the proposed rule is limited to the cost of the rulemaking proceeding itself.

In addition, this rulechange may infact reduce the long term resource burden on NRC by increasing the predictability of the licensing process.

o Other Government Agencies

This rule would impact FEMA. Currently, FEMA uses emergency preparedness exercises in making their finding and determination relative to the adequacy of offsite emergency planning. The Commission then uses these FEMA findings and determinations in issuing an operating license. FEMA would need to change their regulations, 10 CFR 350) and provide their findings and determinations based on the plan review and other available information.

o Industry

This rulemaking would provide for a more predictable licensing procedure. The proposed rule, if adopted, could potentially reduce the burden on licensees in that the litigation of emergency planning issues would be conducted prior to issuing a Part 52 license and not prior to operation. Additionally, for those receiving an operating license, under Part 50, the proposed rule would limit the emergency planning issues that could be litigated prior to operation to those which represent key elements of the plan.

Risk Considerations

As the proposed rule's preamble explains, there will be no change in risk to the public resulting from the change; the change will establish that the Commission does not consider the results of exercises in making licensing decisions and how to resolve the withdrawal of state and local government participation in emergency planning. These changes are based on 10 years experience with exercises. The proposed rule does not change the content of emergency plans or the need for exercising them, both initially and periodically. Rather the proposed rule involves how the Commission intends to use the results of the exercises as they relate to issuance of an operating license.

Impact on Other Requirements:

The proposed amendments would not affect other NRC requirements.

Constraints:

No constraints have been identified that affect implementation of the proposed amendments.

Implementation:

The proposed rule change, if adopted, will be a final rule to be made effective as soon as legally permissible.

TABLE 1

Options for Issue #1, "Use of Exercise Results in Licensing Determinations"

Options	Impact	Chg. in Risk	Basis
<p><u>Option 1</u> - No change</p>	<p><u>NRC</u> - Continued extended hearing on exercise results</p> <p><u>Licensee</u> - Continued potential burden of having extended hearings on exercise results</p> <p>- Continue to have the potential for delays in licensing</p>	<p>None</p>	<p>Maintains status quo</p>
<p><u>Option 2</u> -</p> <p>Allow litigation of only key elements of exercise</p>	<p><u>NRC</u> - Cost for rule change</p> <p>- Potential for reduced burden due to reduced hearing</p> <p><u>Licensee</u> - Potential reduced burden for delays in startup</p> <p>- Potential for limiting hearings</p>	<p>None*</p>	<p>EP exercises still required</p> <p>Content of emergency plan is unchanged</p>



TABLE 1 - Continued

Options	Impact	Chg. in Risk	Basis
<p><u>Option 3</u> -</p> <p>Determine that exercises are not material to licensing decision</p>	<p><u>NRC</u> - Cost for rule change</p> <p>- Potential for reduced burden due to limiting EP exercise litigation</p> <p><u>Licensee</u> - Reduced burden for participating in hearing</p> <p>Greater predictability in licensing process</p>	<p>None*</p>	<ul style="list-style-type: none"> <li>- Emergency Plan and exercise acceptance criteria subject to litigation</li> <li>- Supported by experience</li> <li>- Will require FEMA rule change</li> <li>- EP exercises still required</li> <li>- Content of emergency plan is unchanged</li> </ul>

\* - Based on the fact that experience has been gained in over 10 years of preparing and exercising emergency plans such that the Commission has concluded that exercises of the EP do not uncover fundamental flaws in the plan. (reference - TBD)



TABLE 2

Options for Issue #2 - "Withdrawal of State/Local Cooperation"

Options	Impact	Chg. in Risk	Basis
<p><u>Option 1</u> - No change</p>	<p><u>NRC</u> - None</p> <p><u>IND.</u> - Continue to have delays in licensing and operations when States/local gov'ts withdraw</p>	<p>None</p>	<p>Maintains status quo</p>
<p><u>Option 2</u> - Require utility plan as a backup</p>	<p><u>NRC</u> - Cost of rulechange</p> <p><u>IND.</u> - Cost to prepare backup plan</p> <p>- Potential savings in down time if state/local gov't withdraws</p>	<p>None*</p>	<p>Other factors:</p> <p><u>Pro:</u> A utility plan would be developed, in place and approved if a state became uncooperative</p> <p>A utility couldn't be held hostage by the threat of lack of cooperation by a state or local government</p> <p>There would be no delay in licensing or operation in the 11th hr. a state or local gov't. doesn't wish to cooperate</p> <p>The changing of elected officials in the state would not effect the continued operation of a plant.</p> <p><u>Con:</u> A state may decide not to participate in any emergency planning because the utility would be required to develop a backup plan.</p> <p>The focus of a utility's attention and effort may be split between two plans, delaying completion of the plans.</p>

TABLE 2 - Continued

Options	Impact	Chg. in Risk	Basis
<p><u>Option 3</u> - Allow utility option to submit plan as backup</p>	<p><u>NRC</u> - Cost of rulechange</p> <p><u>INB</u> - Cost to prepare backup plan</p> <p>- Potential savings in down time if state/local gov't withdraws</p>	<p>None*</p>	<p>Other Factors:</p> <p><u>Pro</u>: State would have the incentive to develop the plan and cooperate so as to ensure it is not preempted by utility</p> <p>The utility would have the option of focusing efforts on one plan at a time, rather than splitting attention and effort between two plans.</p> <p><u>Con</u>: If a state decided to not continue its cooperative efforts, the operation of the plant could be jeopardized until a backup plan is developed, exercised and approved.</p> <p>A utility could still be held hostage temporarily by the threat of lack of cooperation by a state or local gov't.</p>

\* Viability of utilizing utility backup plan has been established in 10 CFR 50.47(c)(1)

Enclosure 4 to the Minutes of CRGR Meeting No. 178

Draft Generic Letter Clarifying Staff Position on the  
Vendor Interface Issue (GL 83-28, Item 2.2.2)

January 25, 1990

TOPIC

S. Newberry (NRR) and D. Lasher (NRR) presented for CRGR review a proposed generic letter which would revise the staff's position on programs to assure that licensees receive current technical information from vendors of safety-related equipment. The staff's position had been previously published as Item 2.2.2 in Generic Letter 83-28 regarding the Salem ATWS events.

Licensees had responded to Generic Letter 83-28, generally not adopting the staff position on this matter. The NRC staff had reviewed licensee responses and prepared 12 SERs, some of which were sent to licensees. The SERs generally called for additional action on the part of the licensees to meet the position stated in Generic Letter 83-28.

The NRR staff had then decided that it would be better to issue a new generic letter to accomplish the following:

1. Formally change the staff position to reduce the scope of the effort called for in GL 83-28.
2. Formally request licensees to take the additional actions, beyond what they had already committed to do but less than what was recommended in Generic Letter 83-28, using a generic letter rather than individual plant SERs.
3. Minimize further review efforts.

The slides used by the staff in its presentation are provided as an attachment to this enclosure.

BACKGROUND

The package submitted by the staff for CRGR review of this matter was transmitted by a memorandum dated December 27, 1989 from J. Sniezek to E. Jordan. The package included:

1. The proposed generic letter
2. Contents of packages submitted to CRGR

CONCLUSIONS/RECOMMENDATIONS

The Committee recommended issuing the proposed letter subject to the following recommended revisions:

1. Delete the major programs for diesel generator vendors and major switchgear vendors (Item b on page 3 of the proposed letter).
2. Discuss diesel generator vendors and switchgear vendors as examples of lesser programs (item c of the proposed letter).
3. Include a backfit discussion.
4. Request response in 180 days.

Revisions 1 and 2 above were recommended because it appeared superfluous to provide special treatment for diesel generator and switchgear vendors in view of diesel generator reliability activities under Generic Safety Issue B-56 and the direct focus of the original generic letter (83-28) on circuit breakers.

The CRGR understood that, where it was possible to tell from previous staff review that specific licensees had already satisfied the revised position, those licensees would be exempt from the generic letter.

It was noted that this action was not considered to be a backfit, but rather a voluntary relaxation in previously approved staff positions.

PROPOSED GENERIC LETTER FOR VENDOR INTERFACE

- PROBLEM AT SALEM
- GENERIC LETTER 83-28
- VETIP/NUTAC
- STAFF EVALUATIONS
- INSPECTION AND OPERATING EXPERIENCE
- PROPOSED GENERIC LETTER

GENERIC IMPLICATIONS OF ATWS EVENTS  
AT THE SALEM NUCLEAR POWER PLANT  
(NUREG-1000 VOL. 1, 2.3.2)

RTB MAINTENANCE NOT IN CONFORMANCE WITH WESTINGHOUSE TECH  
BULLETIN RECOMMENDATIONS REGARDING CLEANING AND LUBRICATION

PSE&G SAID THEY NEVER RECEIVED TECH BULLETIN NOR WERE THEY AWARE  
OF EXISTENCE

WESTINGHOUSE TECH MANUAL FOR RTBS HAD NOT BEEN UPDATED TO INCLUDE  
TECH BULLETIN INFORMATION

EQUIPMENT SPECIFICATION AND ORIGINAL PROCUREMENT DOCUMENTS WERE  
NOT UPDATED TO INCLUDE TECH BULLETIN INFORMATION

WESTINGHOUSE HAD NOT NOTIFIED PSE&G OF THE EXISTENCE OF UV  
ATTACHMENT IMPROVEMENTS. (TO OBTAIN IMPROVED RTB UVS, UTILITIES  
NEEDED TO REQUEST THEM SPECIFICALLY)

OTHER EXAMPLES OF VENDOR PROBLEMS IN UPDATING AND CONTROLLING  
INFORMATION THAT DIDN'T HAVE DIRECT RELATIONSHIP TO EVENT.

## 2.2 EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE (PROGRAMS FOR ALL SAFETY-RELATED COMPONENTS)

### POSITION

LICENSEES AND APPLICANTS SHALL SUBMIT, FOR STAFF REVIEW, A DESCRIPTION OF THEIR PROGRAMS FOR SAFETY-RELATED EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE AS DESCRIBED BELOW:

2. FOR VENDOR INTERFACE, LICENSEES AND APPLICANTS SHALL ESTABLISH, IMPLEMENT AND MAINTAIN A CONTINUING PROGRAM TO ENSURE THAT VENDOR INFORMATION FOR SAFETY-RELATED COMPONENTS IS COMPLETE, CURRENT AND CONTROLLED THROUGHOUT THE LIFE OF THEIR PLANTS, AND APPROPRIATELY REFERENCED OR INCORPORATED IN PLANT INSTRUCTIONS AND PROCEDURES. VENDORS OF SAFETY-RELATED EQUIPMENT SHOULD BE CONTACTED AND AN INTERFACE ESTABLISHED. WHERE VENDORS CANNOT BE IDENTIFIED, HAVE GONE OUT OF BUSINESS, OR WILL NOT SUPPLY INFORMATION, THE LICENSEE OR APPLICANT SHALL ASSURE THAT SUFFICIENT ATTENTION IS PAID TO EQUIPMENT MAINTENANCE, REPLACEMENT, AND REPAIR, TO COMPENSATE FOR THE LACK OF VENDOR BACKUP, TO ASSURE RELIABILITY COMMENSURATE WITH ITS SAFETY FUNCTION (GDC-1). THE PROGRAM SHALL BE CLOSELY COUPLED WITH ACTION 2.2.1 ABOVE (EQUIPMENT QUALIFICATION). THE PROGRAM SHALL INCLUDE PERIODIC COMMUNICATION WITH VENDORS TO ASSURE THAT ALL APPLICABLE INFORMATION HAS BEEN RECEIVED. THE PROGRAM SHOULD USE A SYSTEM OF POSITIVE FEEDBACK WITH VENDORS FOR MAILINGS CONTAINING TECHNICAL INFORMATION. THIS WOULD BE ACCOMPLISHED BY LICENSEE ACKNOWLEDGEMENT FOR RECEIPT OF TECHNICAL MAILINGS. IT SHALL ALSO DEFINE THE INTERFACE AND DIVISION OF RESPONSIBILITIES AMONG THE LICENSEE AND THE NUCLEAR AND NONNUCLEAR DIVISIONS OF THEIR VENDORS THAT PROVIDE SERVICE ON SAFETY-RELATED EQUIPMENT TO ASSURE THAT REQUISITE CONTROL OF AND APPLICABLE INSTRUCTIONS FOR MAINTENANCE WORK ON SAFETY-RELATED EQUIPMENT ARE PROVIDED.



NUCLEAR UTILITY TASK FORCE (NUTAC)  
VENDOR EQUIPMENT TECHNICAL INFORMATION PROGRAM (VETIP)

USE EXISTING ACTIVITIES TO ENSURE EFFECTIVE COMMUNICATION OF  
SAFETY RELATED TECHNICAL INFORMATION FOR USE BY UTILITIES:

- ° UTILITY/VENDOR INTERCHANGE
  - NSSS
  - OWNERS GROUPS
  - TECH MANUALS/SPARES/PURCHASES/FAILURES
  
- ° UTILITY/REGULATOR INTERCHANGE
  - PART 21
  - IN/BULLETIN/GL
  
- ° SEE-IN (SIGNIFICANT EVENT EVALUATION AND INFORMATION NETWORK)
  - NUCLEAR NETWORK
  
- ° NPRDS (NUCLEAR PLANT RELIABILITY DATA SYSTEM)

## NRC STAFF EVALUATIONS

1987

14 PLANT SPECIFIC SERS ON ITEM 2.2.2 COMPLETED

- ACCEPT VETIP
- DESCRIBE STAFF PROGRAM ON KEY COMPONENTS  
"LICENSEE SHOULD EXPAND THEIR PROGRAM....."

FARLEY INSPECTION

- PROGRAM FOR NSSS, DGS, SWITCHGEAR VENDORS
- OTHER VENDORS NOT CONTACTED REGULARLY

1988/1989

- PLANT SPECIFIC REVIEWS TERMINATED DUE TO LACK OF  
COMMITMENT TO STAFF POSITION
- ALTERNATIVES TO RESOLVE ISSUES INVESTIGATED
- DECIDED TO ADDRESS WITH GENERIC LETTER

PROPOSED GENERIC LETTER

VETIP FRAMEWORK IS ADEQUATE

OPERATING EXPERIENCE INDICATES THAT PERIODIC CONTACT WITH  
EQUIPMENT VENDORS WILL HELP PROVIDE IMPROVED INFORMATION FOR  
PLANT USE

PROGRAM SHOULD INCLUDE VENDORS FOR:

NSSS

DG AND SWITCHGEAR

KEY SR COMPONENTS (BASED ON

LICENSEE EVALUATION)

NO FURTHER PROGRAM REVIEWS BY NRR - FOCUS WILL BE ON  
EFFECTIVENESSES THROUGH INSPECTION ACTIVITIES

ADDITION TO GENERIC LETTER

THE ACTIONS DESCRIBED IN THIS GENERIC LETTER ARE RELAXATIONS OF THE ORIGINAL POSITION TAKEN IN GENERIC LETTER 83-28 AND ARE NOT CONSIDERED A BACKFIT IN ACCORDANCE WITH NRC PROCEDURES. AN EVALUATION OF THIS LETTER WAS PERFORMED IN ACCORDANCE WITH 10CFR50.109 AND WILL BE MADE AVAILABLE IN THE PUBLIC DOCUMENT ROOM WITH THE MINUTES OF THE MEETING OF THE COMMITTEE TO REVIEW GENERIC REQUIREMENTS

**ROUTING AND TRANSMITTAL SLIP**

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PDR

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**REMARKS**

This previous Central File material can now be made publicly available.

*MATERIAL RELATED TO CAGR  
MEETING NO. 178*

*CC (LIST ONLY) JEAN RATNE,  
PDR L STREET*

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MATERIAL RELATED TO CRGR MEETING NO. 178  
TO BE MADE PUBLICLY AVAILABLE

1. MEMO FOR J. TAYLOR FROM E. JORDAN DATED 2-20-90  
SUBJECT: MINUTLS OF CRGR MEETING NUMBER 178  
INCLUDING THE FOLLOWING ENCLOSURES WHICH WERE NOT  
PREVIOUSLY RELEASED:
  - a. ENCLOSURE 2  
A SUMMARY OF DISCUSSIONS OF A PROPOSED Supplement  
to IPE BL on CPI Results
  - b. ENCLOSURE 3  
A SUMMARY OF DISCUSSIONS OF A PROPOSED Emergency  
Preparedness Rulemaking Relating to Part 52  
licensing for NPPs
  - c. ENCLOSURE 4  
A SUMMARY OF DISCUSSIONS OF A PROPOSED BL Clarifying  
Staff Position on the Vendor Interface Issue  
(BL 83-28, item 2.2.2)
2. MEMO FOR E. JORDAN FROM E. Beckford DATED Undated  
FORWARDING REVIEW MATERIALS ON A PROPOSED Supplement 2  
to BL 88-20, IPE
3. MEMO FOR E. JORDAN FROM E. Beckford DATED Undated  
FORWARDING REVIEW MATERIALS ON A PROPOSED Rule on  
Emergency Preparedness Relating to Part 52 licensing  
for NPPs
4. MEMO FOR E. JORDAN FROM \_\_\_\_\_ DATED \_\_\_\_\_  
FORWARDING REVIEW MATERIALS ON A PROPOSED

