



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 2, 1994

MEMORANDUM TO: The Chairman  
Commissioner Rogers  
Commissioner de Planque

FROM: James M. Taylor  
Executive Director for Operations

SUBJECT: REVISION TO PROPOSED PROBABILISTIC RISK ASSESSMENT (PRA)  
POLICY STATEMENT

In the Commission's Staff Requirements Memorandum (SRM) of October 4, 1994, concerning SECY-94-218, "Proposed Policy Statement on the Use of Probabilistic Risk Assessment Methods in Nuclear Regulatory Activities," the Commission directed the staff to revise the proposed PRA policy statement and publish the revised statement in the Federal Register. The staff revised the policy statement using the guidance in the SRM. A copy of the Federal Register notice regarding the revised policy statement is attached for Commission information.

In response to the SRM, the staff made several changes to the proposed PRA policy statement. The principal changes are the following:

- (1) Broadening the scope of the proposed policy statement by deleting the word "reactor" in items (1) and (2) of the statement and making corresponding changes in the supporting text.
- (2) Providing a discussion, more understandable to the public, of the implications associated with expanding the use of PRA methods and techniques in the regulatory process. The staff presents a clearer, simpler discussion that describes the similarities and differences between deterministic and probabilistic approaches to regulation and explains their relationship to the defense-in-depth philosophy.
- (3) Including a separate section that contains a discussion of the uncertainties and limitations of deterministic and probabilistic approaches to regulation. In the discussion, the staff acknowledges that uncertainties exist in any regulatory approach, uncertainties can be accounted for in a PRA approach, and human performance is always an important consideration.

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- (4) Incorporating several points from the Advisory Committee on Reactor Safeguards letter of May 11, 1994, including the comment that a PRA approach to regulation is an extension and enhancement of traditional, deterministic regulation.

The Commission also directed the staff to include a statement, in the policy statement Federal Register notice, indicating that the staff intends to conduct a public workshop on the PRA Implementation Plan. This statement was not included in the proposed policy statement because the attached Federal Register notice will not be published prior to the workshop. However, the PRA Implementation Plan public workshop has been separately noticed in the Federal Register (59 FR 54925) and contains a section that discusses the proposed PRA policy statement. The PRA Implementation Plan public workshop is being conducted on December 2, 1994. A copy of the proposed policy statement is being distributed at the workshop.

The staff has forwarded the attached Federal Register notice to the Office of Administration for publication.

Attachment: Federal Register Notice Regarding the Proposed PRA Policy Statement

cc: w/Attachments:

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- \*\* CONCURRED VIA TELEPHONE
- \* See previous concurrence

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