



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

ATTACHMENT 10

April 13, 1982

MEMORANDUM FOR: ALL NRR EMPLOYEES

FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: NRR OFFICE LETTER NO. 2, REVISION 2 - NUREG-0800 -
STANDARD REVIEW PLAN FOR THE REVIEW OF SAFETY ANALYSIS
REPORTS FOR NUCLEAR POWER PLANTS

This revision supersedes NRR Office Letter No. 2, Revision 1, and Supplement 1 to NRR Office Letter No. 2 dated November 23, 1981 and October 30, 1981, respectively. Revision 2 incorporates Enclosure 1, an updated assignment list of review responsibilities for primary and secondary review branches, Enclosure 2, a procedure for processing a revision to the Standard Review Plan, and information pertinent to final rule 10-CFR Part 50, §50.34(g).

NUREG-0800 (formerly NUREG-75/087), the July 1981 edition of the "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants" (SRP), has been published and distributed. This revision of the SRP is the product of the integrated efforts and results of all NRR branches in assuring that each SRP section is congruent with the requirements of current NRC regulations and conforms with current regulatory guides and previously approved staff requirements and positions.

NUREG-0800 has been distributed externally to contractors and consultants engaged in NRC casework in accordance with the requests made by division directors. Copies of the SRP are available to the nuclear industry and the general public through purchase from the National Technical Information Service. NRR internal distribution has been made by position title (rather than an individual name). Section leaders and above in all technical organizational elements have received a complete copy of the SRP through distribution from TIDC. Branch Chiefs in the Division of Licensing have received sufficient copies for distribution of a complete SRP to each Operating Reactors Project Manager and Licensing Project Manager. Requests for necessary changes to the distribution list for the complete SRP should be approved by a Division Director and transmitted to the Chief, Licensing Guidance Branch, DST. Those on the distribution list will receive copies of subsequent revisions as they are issued.

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In addition, the Licensing Guidance Branch has distributed copies of individual sections of the SRP to technical review Branch Chiefs so that individual technical reviewers have available the individual sections pertinent to performing their assigned review responsibilities (Enclosure 1). Upon request, other SRP sections that a reviewer uses on a regular basis can be provided by LGB.

In recognition of the importance of the SRP to the staff, the nuclear industry, and the public in assuring that features that are essential to protect the public health and safety are included in a consistent and acceptable manner for all plants licensed, project managers and technical reviewers should use the Standard Review Plan in their reviews to assure that these goals are achieved. The SRP provides a well-defined base for performing safety reviews of applications to construct and operate nuclear facilities. The uniform implementation of design requirements, criteria and guidelines contained in the SRP by all NRR staff members should assure that the acceptable level of safety will be maintained during the licensing process. Staff reviewers should not decrease nor go beyond the scope and requirements of any specific SRP section. If a staff member believes that protection of public safety necessitates a requirement in excess of those defined in the SRP, the staff member should present the matter to management, prior to incorporating it in a review.

Your attention is called particularly to the Introduction section of the SRP. Every NRR staff member should carefully read and fully understand the Introduction. It describes the relationship of the SRP to the regulations and the regulatory guides, and indicates the manner in which the SRP will be utilized in the regulatory process. Since the SRP does not contain new review requirements, reviews are to be performed in a manner described in the Review Procedures section and address the aspects identified in the Areas of Review section of the SRP. Since the staff review is an audit of the licensee's analysis, the review may emphasize or delete particular aspects of an SRP section, as is appropriate for the application under review. These deletions or areas of increased emphasis are acceptable, provided that the reviewer has management approval and documents the scope and depth of the review in the SER. Starting with the SER for Clinton 1 (the first SER scheduled for 1982), each reviewer shall provide a brief description in the SER of the review actually performed by the NRC staff; licensees should not be asked for additional information to facilitate this staff requirement. Examples of acceptable variations from the SRP include deletions because of design similarities to a second unit recently reviewed, and increased emphasis as a result of new developments from operating experience, or unique design features not considered when the SRP was written. Reviews that are nearly complete or have been completed using earlier acceptance criteria or review methods should not be repeated nor should on-going reviews be delayed.

On March 10, 1982, the Commission approved a final rule 10 CFR Part 50, §50.34(g) - Documentation of Differences from the Standard Review Plan. This rule requires certain applicants, those applications docketed after May 17, 1982, to identify and describe all differences in design features, analytic techniques and procedural methods between those proposed for a facility and those given in the acceptance criteria of the Standard Review Plan. NUREG-0906 provides guidance for implementing 10 CFR 50.34(g). After public comment, approval by the Commission and clearance by the Office of Management and Budget, all NRR staff reviewers will have to make an explicit evaluation finding in SERs to provide justification and appropriate bases for accepting the applicants' documented deviations.

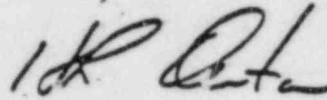
The Standard Review Plan represents the most definitive basis available for specifying NRC's design criteria and design guidelines for an "acceptable level of safety" for light water reactor facility reviews. The Plan resulted from many years of experience gained by the staff in establishing and using regulatory requirements in the safety evaluations of nuclear facilities. This Plan is part of a continuing regulatory standards development activity that not only documents current methods of review, but also provides a base for an orderly modification of the review process in the future. It will be revised and updated periodically as the need arises to clarify the content or correct errors. In addition, proposals to modify the plans will be considered for matters of major safety significance. A major increase or decrease in safety requirements or scope of review for any SRP section will require approval by the Director of the Office of Nuclear Reactor Regulation. Prior to final approval by the Director, an SRP revision and an associated value-impact statement will be published as a "Proposed Revision to the Standard Review Plan" for public comments. The comment period permits the public to participate in the decision-making process before the SRP section is approved and issued in final form, and will encourage public input to the content of new requirements and to the value-impact statement associated with each new or revised section of the SRP. The procedure in Enclosure 2 will be used for processing a revision to the Standard Review Plan. Proposed changes to the SRP for clarification, to correct errors, to update references to new or revised regulations and regulatory guides, and proposals for substantive revisions to the plan should be transmitted to the Chief, Licensing Guidance Branch for processing in a timely manner.

Implementation of this approach with respect to the SRP use and revision procedure will add greater stability to the licensing process and increase confidence that requirements imposed by NRC are congruent with the regulations and are commensurate with the safety value to be expected. Your careful

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consideration of this memorandum and its consistent implementation should enable NRR to carry out its statutory function with full consideration of the public interest.



Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosures:

1. Assignment of Review Responsibilities
2. Procedure for Processing a Revision to the Standard Review Plan

cc: WDircks, EDO
BGrimes, IE
GCunningham, ELD