

POLICY ISSUE
NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: Commissioner Wright
SUBJECT: SECY-21-0029: Rulemaking Plan on Relaxation of
Inservice Testing and Inservice Inspection Program
Update Frequencies Required in 10 CFR 50.55a

Approved X Disapproved Abstain Not Participating

COMMENTS: Below Attached X None

Entered in STARS

Yes X

No

Signature

September 3, 2021

Date

Commissioner Wright's Comments on SECY-21-0029, "Rulemaking Plan on Revision of Inservice Testing and Inservice Inspection Program Update Frequencies Required in 10 CFR 50.55a"

I approve the staff's recommendation to initiate a rulemaking to amend 10 C.F.R. § 50.55a that would extend the required Inservice Inspection (ISI) Program and Inservice Testing (IST) Program Code of Record update frequency from 120 months to 240 months. The rulemaking would apply to licensees that have updated their ISI and IST programs to the most recent edition and addenda of the Codes incorporated by reference in 10 C.F.R. § 50.55a by the effective date of the final rule. I also approve a future extension from 240 to 288 months if the ISI interval is extended to 12 years. I agree with the Chairman that this proposal does not affect the NRC's ability to maintain reasonable assurance of adequate protection of the public health and safety and that the NRC can take necessary action to address emergent safety issues, irrespective of the update cycle. In addition, licensees must still meet all related Code provisions for the 10-year interval according to their current Code of Record.

I appreciate the staff's engagement with the Advisory Committee on Reactor Safeguards (ACRS) on this issue and its coordination with EMBARK Venture Studio. I agree with the ACRS that the staff should move expeditiously to implement the remaining recommendations in the EMBARK Venture Studio's report regarding streamlining rules for unconditionally approved Code Cases and decreasing the frequency of Code Edition rulemakings. These efforts should increase the effectiveness and efficiency of the NRC's 10 C.F.R. § 50.55a regulatory activities.

I also approve the staff's requests to not develop a regulatory basis for these rulemakings and to delegate signature authority to the EDO. As discussed in the paper, these narrow and clearly defined rulemakings have been vetted with stakeholders and the ACRS, and the staff will continue to keep the ACRS informed as the rulemaking progresses. Finally, I agree with the staff that CRGR and ACMUI reviews are not necessary.