

**POLICY ISSUE**  
**NOTATION VOTE**

**RESPONSE SHEET**

**TO:** Carrie M. Safford, Secretary

**FROM:** Commissioner Caputo

**SUBJECT:** SECY-22-0019: Rulemaking Plan for Revision of Embrittlement and Surveillance Requirements for High-Fluence Plants in Long-Term Operation

Approved  X  Disapproved  X  Abstain       Not Participating     

**COMMENTS:** Below  X  Attached       None     

In SECY-22-0019, the staff seeks Commission approval to commence a focused rulemaking to amend appendix H to 10 CFR part 50 to include additional surveillance testing requirements for long-term operation. Based on its assessment, the staff recommends avoiding unnecessary impacts on reactors where the reactor pressure vessel materials will not experience higher fluence levels than those properly represented by the current embrittlement trend curve. I find that the staff's recommended alternative two aligns best with the Principles of Good Regulation of Efficiency and Reliability by minimizing the use of resources and avoiding an unjustifiable state of transition for the regulations. I approve the staff's recommended alternative two to initiate a rulemaking to revise appendix H to 10 CFR part 50.

Decades of testing and analysis of reactor pressure vessel coupons will have produced a robust set of high-quality data. In addition to this rulemaking, staff should explore the potential for artificial intelligence to analyze existing data on embrittlement as a supplement to future coupon sampling and analysis.

**Entered in STARS**

Yes  ✓

No     

  
**Signature**

4-24-24   
**Date**