

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary  
FROM: CHAIRMAN DICUS  
SUBJECT: SECY-99-191- MODIFICATIONS TO THE SAFETY GOAL  
POLICY STATEMENT

Approved  Disapproved  Abstain

Not Participating

COMMENTS:

See attached comments.

Aneta Jay Dicus  
SIGNATURE

August 7, 1999  
DATE

Entered on "AS" Yes  No

**Chairman Dicus**  
**Comments on SECY-99-191**  
**Modifications to the Safety Goal Policy Statement**

I approve the staff's actions outlined in SECY-99-191, "Modifications to the Safety Goal Policy Statement," to modify the Safety Goal Policy Statement and to begin the feasibility study of the development of overarching safety principles for the NRC. I am pleased to hear that the Agency will develop overarching safety principles for application to the spectrum of NRC-regulated entities. Also, I look forward to the definition of long-standing terms. I believe that the conceptual outline offers a significant start in the development of the overarching safety principles. In light of this approval, I offer the following comments:

The staff should ensure that the proposed action in SECY-99-191 aligns with other staff activities (such as SECY-99-100 regarding risk informing materials regulatory activities).

It is more appropriate to explore the issue of providing a definition of "adequate protection" and "defense-in-depth" in terms of the overarching safety principles rather than the Safety Goal Policy Statement. The staff should continue to study the legal and technical implications of defining these terms. The staff should not consider defining "zone of presumptive adequate protection."

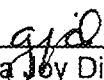
A safety goal(s) for non-power reactors and materials users should be developed. In developing the overarching safety principles, the staff should consider what "safety" means for the materials program and ensure it is incorporated. (As similarly noted in the SRM dated June 28, 1999, the staff was directed to define what "safety" means for the materials program and develop appropriate materials safety goals).

The general principles outlined in Regulatory Guide 1.174 should be included in the proposed modification to the Safety Goal Policy Statement.

Temporary changes in risk should be considered in regard to defense-in-depth, and in particular, configuration control. However, care must be taken to assure that the flexibility of the Maintenance Rule and its attendant amendments is not hampered or reinterpreted by a modification of the Safety Goal Policy Statement or development of overarching safety principles.

The staff should notify the Commission promptly if it appears that resource impacts go beyond those anticipated.

To the extent practicable, the staff should seek stakeholder involvement in the modification of the Safety Goal Policy Statement. To the degree that stakeholder involvement for this coincides with stakeholder involvement in the development of the overarching safety principles, staff may credit this involvement. As appropriate, input from the Agreement States should be sought in the development of the overarching safety principles.

  
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Greta Joy Dicus

18-7-99  
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Date