



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

October 9, 2012

SECRETARY

COMMISSION VOTING RECORD

DECISION ITEM: SECY-12-0091

TITLE: COMPLETENESS AND QUALITY OF INTEGRATED
SAFETY ANALYSES

The Commission acted on the subject paper as recorded in the Staff Requirements Memorandum (SRM) of October 9, 2012.

This Record contains a summary of voting on this matter together with the individual vote sheets, views and comments of the Commission.

A handwritten signature in black ink, appearing to read "Annette Vietti-Cook", written over a horizontal line.

Annette L. Vietti-Cook
Secretary of the Commission

Attachments:

1. Voting Summary
2. Commissioner Vote Sheets

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
OGC
EDO
PDR

VOTING SUMMARY - SECY-12-0091

RECORDED VOTES

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIP	COMMENTS	DATE
CHRM. MACFARLANE	X		X			9/13/12
COMR. SVINICKI	X					9/25/12
COMR. APOSTOLAKIS	X		X			7/16/12
COMR. MAGWOOD	X					9/6/12
COMR. OSTENDORFF	X		X			8/3/12

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: Chairman Allison M. Macfarlane
SUBJECT: SECY-12-0091 – COMPLETENESS AND QUALITY OF INTEGRATED SAFETY ANALYSES

Approved In Part X Disapproved In Part X Abstain
Not Participating

COMMENTS: Below Attached X None



SIGNATURE
a 12/12

DATE

Entered on "STARS" Yes X No

**Chairman Macfarlane's Comments on SECY-12-0091,
"Completeness and Quality of Integrated Safety Analyses"**

I approve the staff's recommendation to proceed with Option 1, that the agency make a request of the American Nuclear Society (ANS) to develop a standard for Integrated Safety Analyses. I support this option because I anticipate that this standard would improve safety for current and future licensees, most notably by making recommendations in the area of human performance. Human error contributes to a large percentage of events reported by licensees, and, for Fuel Cycle facilities over the past 10 years, human errors have contributed to more than 30 reported events each year.

I also support the staff's recommendation to proceed with Option 3, that the guidance found in NUREG-1520 is revised. Revisions to the agency's guidance documents would enhance the completeness and quality of the Integrated Safety Analyses, and I believe both licensee submittals and NRC reviews would benefit. I agree with Commission Apostolakis that the staff should not duplicate the efforts with ANS. Therefore, the staff should not revise the NUREG documents before the ANS standard is complete. However, I also agree with Commissioner Magwood that there is a need for guidance in areas other than those that the ANS standard will address. The staff should move forward, by issuing interim staff guidance where needed, in areas that are unrelated to those that would be covered by the ANS's standard. I believe it is important for the staff to work closely with ANS to complete the standard expeditiously.

With respect to a regulatory requirement for licensees to conduct peer reviews of their Integrated Safety Analyses, recognizing the practical difficulties of such a mandate, at this time I approve the staff's recommendation to continue with Option 2, the status quo.


Allison M. Macfarlane

9/13/12
Date

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER SVINICKI
SUBJECT: SECY-12-0091 – COMPLETENESS AND QUALITY OF INTEGRATED SAFETY ANALYSES

Approved XX Disapproved _____ Abstain _____

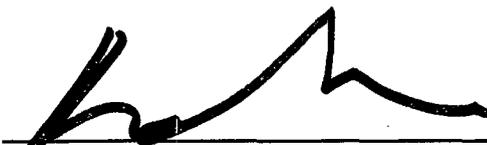
Not Participating _____

COMMENTS: Below XX Attached ___ None ___

I approve the staff's recommendation of Option 1, wherein the staff would request that the American Nuclear Society (ANS) develop a standard for preparing and using Integrated Safety Analyses (ISA). I agree with Commissioner Ostendorff that ISAs have been effective to date at identifying safety significant fuel cycle processes and that promulgation of a standard that is applicable to all fuel cycle facilities may be challenging given the diversity of their operations and attendant risks. However, the standards development process used by ANS will allow for the acknowledgement and consideration of these and other factors, through the use of experts with varied backgrounds. Therefore, I support proceeding with development of a standard.

In the interim, and to eliminate rework upon issuance of a standard, the staff should approach any updating of ISA review guidance in a narrow fashion. It may be appropriate for the staff – on a limited basis – to issue interim staff guidance, but only on topics previously identified by the staff as needing clarification, such as the use of passive design features, bounding assumptions, initial conditions, and the completeness of ISA summaries.

With respect to the conduct of peer reviews of ISAs, I approve the staff's recommendation of Option 2, continuing the use of existing practices that can enhance ISA quality.



SIGNATURE

09/25/12

DATE

Entered on "STARS" Yes No _____

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: Commissioner Apostolakis
SUBJECT: SECY-12-0091 – COMPLETENESS AND QUALITY OF INTEGRATED SAFETY ANALYSES

Approved X (in part) Disapproved X (in part) Abstain _____

Not Participating _____

COMMENTS: Below _____ Attached X None _____



SIGNATURE

7/16/12

DATE

Entered on "STARS" Yes No _____

Commissioner Apostolakis' comments
SECY-12-0091 – COMPLETENESS AND QUALITY OF INTEGRATED SAFETY
ANALYSES

I approve staff's Option 1 for ISA Standards. Under this Option, staff would request the American Nuclear Society to develop a standard for preparing and using Integrated Safety Analyses (ISA). Staff should not update ISA review guidance until the standard is finalized. I also support staff's Option 2 for ISA Peer Reviews. Under Options 2, staff would continue to use existing licensing practices that enhance the quality of integrated safety analyses.

The Advisory Committee on Reactor Safeguards (ACRS), in its letter dated February 17, 2011, states that ISAs, in combination with practices required by current regulations, are adequate for the protection of the health and safety of workers and the public, as well as for licensing fuel cycle facilities under 10 CFR Part 70. For more complex facilities, however, especially those with the potential for large radiological exposure or chemical releases, the ACRS states that the use of a PRA approach is advantageous because it provides a more comprehensive basis for prioritization of safety systems and maintenance activities. Staff should request that the ANS standard address explicitly the diversity of fuel-cycle facilities and provide appropriate methodologies.



George Apostolakis 7/16 /12

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER MAGWOOD
SUBJECT: SECY-12-0091 – COMPLETENESS AND QUALITY OF
INTEGRATED SAFETY ANALYSES

Approved X Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below ___ Attached X None ___



SIGNATURE

6 September 2012

DATE

Entered on "STARS" Yes X No ___

**Commissioner Magwood's Comments on SECY-12-0091,
"Completeness and Quality of Integrated Safety Analyses"**

The process to develop Integrated Safety Analyses (ISAs) for licensee facilities involves a complex interaction of experts to consider the risks present at each stage of a given process, the external events that could comprise safety, and the careful identification of key equipment and procedures that are essential for safety. These analyses form the basis for licensing materials processing facilities for construction and operation.

As a result, the quality of the ISA process is an essential aspect of safety. The Commission has considered the question of ISA adequacy for this purpose for years and has concluded that ISAs are an appropriate tool to analyses hazards and establish licensing bases for a range of NRC-regulated process facilities. However, in reaching this conclusion, the Commission questioned the assurance we can have that all licensees perform these critical analyses to the level of completeness and quality necessary to support the adequate protection of public health and safety.

Staff has responded with SECY-12-0091, which provides a range of options to assure ISA quality. I recognize that this has been a challenging subject for both the staff and many licensees. However, I believe that staff, working with our stakeholders, has established a direction that is at once appropriate to the cause and responsive to the Commission's concerns. As a result, I approve staff's recommendation in Option 1 to request that the American Nuclear Society (ANS) develop an ISA standard that would provide clear guidelines for licensees that perform ISAs and, as staff indicates in its paper, provide licensees with an improved ability to identify those elements which serve as leading indicators of ISA quality.

However, I have reservations about staff's recommendation reflected in Option 3, which anticipates the revision of NUREG 1520 contemporaneously with the development of the new ISA standard. I do not believe it reasonable for the agency to revise the NUREG to provide guidance in areas that will also be addressed by the proposed standard. However, to provide for an efficient process, it would be reasonable for staff to revise those portions of NUREG 1520 that do not impact areas such as common cause failures, human error, and accident sequence screening. Staff could accomplish this by issuing an interim staff guidance regarding areas that are unrelated to those to be covered by the standard.

I am also sympathetic to staff's concerns about the difficulties presented by requiring the peer review of ISAs given the limited number of experts who can evaluate processes and the need to protect intellectual property. I therefore agree that Option 1 for peer reviews would not be appropriate. However, I believe that we should improve upon the "current practice" if possible. Therefore, I support Option 2 contingent upon the inclusion of the consideration of the need for and best approaches to accomplish peer review as an integral element of NRC's request to ANS to develop an ISA standard.

 9/6/12

William D. Magwood, IV

Date

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER OSTENDORFF
SUBJECT: SECY-12-0091 – COMPLETENESS AND QUALITY OF INTEGRATED SAFETY ANALYSES

Approved X Disapproved X Abstain

Not Participating

COMMENTS: Below X Attached None

I approve in part and disapprove in part the staff's recommendations to request that the American Nuclear Society develop a standard for integrated safety analyses (ISA), improve the review guidance in NUREG 1520 on selected ISA topics, and continue with the current practices for peer reviews. With regard to peer reviews, I approve the staff's recommended Option 2 to maintain current practices that can enhance ISA quality similar to peer reviews.

With regard to ISA standard development, I do not approve the staff's recommended Option 1, to request that ANS develop an ISA standard. While improving the guidance in the areas suggested in the staff's paper would enhance the quality of ISAs, I continue to believe that ISAs have been effective at identifying safety significant fuel cycle processes. Since the enhancements to ISA quality suggested in the paper are enhancements to an otherwise satisfactory process, development of a standard is not necessary. Furthermore, promulgation of a standard that is applicable to all fuel cycle facilities may be challenging given the one-of-a kind nature of these facilities. For these reasons, the enhancements suggested by the staff would best be implemented by the NRC staff in an update to future guidance. Therefore, I approve the staff's recommended Option 3 to improve guidance in NUREG 1520 on selected topics such as common cause failure, human error, and accident sequence screening. Work on these guidance improvements should not take priority over the guidance that is being developed in support of the final rule on ISAs that is currently before the Commission and should not delay that rulemaking activity.



SIGNATURE

8/3/12

DATE

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