

January 2, 1998

FOR: The Commissioners
 FROM: L. Joseph Callan /s/ Executive Director for Operations
 SUBJECT: STAFF REQUIREMENTS MEMORANDUM 951219A - BRIEFING ON MECHANISMS FOR ADDRESSING GENERIC SAFETY ISSUES

PURPOSE:

To inform the Commission of the staff's progress on actions in response to a staff requirements memorandum (SRM) dated January 19, 1996, ([attached](#)) concerning mechanisms for addressing generic safety issues (GSIs).

BACKGROUND:

On December 19, 1995, the staff briefed the Commission on mechanisms for addressing GSIs, following which, the attached SRM was issued with three items that contained staff requirements. In response to two of these items (9600001, 9600002), SECY-96-089, "Comparison of Costs of Generic Requirements Estimated by the NRC with those Estimated by Industry; Staff Effort Expended on Generic Activities," was issued on April 30, 1996, with a summary of the staff effort expended in each office on generic issues, and a comparison of licensee costs associated with the resolution of some generic issues with those contained in NRC regulatory analyses. The third item (9600088) directed the staff to: (1) ensure that the respective roles of each office are understood and that close coordination is practiced to eliminate any duplication of effort; and (2) have one agency-wide generic issue resolution tracking system, coupled with consistency of prioritization between offices. The plan for completing this item and the responsibilities of all offices (NRR, RES, NMSS, AEOD, IRM) involved with analyzing and evaluating data for the identification of generic issues were delineated in SECY-96-107, "Uniform Tracking of Agency Generic Technical Issues," dated May 14, 1996. This paper presents the progress made by the staff in completing the SRM requirements pertaining to roles of Offices, generic issue resolution tracking, and consistency of prioritization between offices.

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DISCUSSION:

The following is a summary of the actions taken by the staff in meeting the Commission's requirements:

- (1) Management Directive (MD) 8.5, Revision 1, "Operational Safety Data Review," was revised in December 1997 to ensure that the respective roles of each office are understood in the identification and treatment of generic issues resulting from the review of operational safety data, and that close coordination is practiced to eliminate any duplication of effort. Currently, the NRC process for addressing GSIs from all sources, operational and non-operational, is delineated in NUREG-0933, "A Prioritization of Generic Safety Issues." This process will be incorporated into a new MD 6.4, "Generic Safety Issues," to define the roles of all offices in the treatment of GSIs. This approach will be consistent with the plan in SECY-97-220, "Implementation of DSI-22 Research," in which the approach for the resolution of GSIs will be revised to more clearly define office responsibilities: RES will be responsible for prioritization and development of the technical bases for resolution of GSIs, including research and analysis, and the program offices will be responsible for implementing the resolution. This approach will be clarified through the issuance of MD 6.4, which is currently planned for December 1998. However, this approach could be affected by the final Commission decision on the staff's response to the December 5, 1997, memorandum, "Staff Requirements - SECY-97-220 - Implementation of DSI-22 Research," which contains Commission comments on the RES DSI-22 implementation plan.
- (2) The Generic Issue Management Control System (GIMCS) is the agency-wide tracking system for GSIs, while the prioritization methods used for reactor and non-reactor GSIs are different. RES will continue to use the method delineated in NUREG-0933, "A Prioritization of Generic Safety Issues," to prioritize GSIs related to nuclear power plants. This method was approved by the Commission in December 1983 and again in July 1993. However, the technology for assessing the risk of most non-reactor GSIs is still not sufficiently advanced and accepted to permit the use of a quantitative prioritization procedure. Additionally, as noted in Appendix C of NUREG/BR-0184, "Regulatory Analysis Technical Evaluation Handbook," the variety of facility types and the relatively non-integrated sets of available information lend difficulty to performing a value-impact analysis in the more straightforward manner used for nuclear power reactors. Therefore, NMSS will use the qualitative method outlined in NMSS Policy and Procedures Letter 1-57, "NMSS Generic Issues Program," to identify and prioritize GSIs in the areas of nuclear fuels; waste storage; and industrial, medical, and other facilities that use by-product materials.

In the Commission's Strategic Assessment and Rebaselining Initiative, one of the direction-setting issues was DSI-12, Risk-Informed, Performance-Based Regulation. As a result of the SRM issued on April 15, 1997, concerning DSI-12, the staff is developing a framework for applying risk-analysis methods to nuclear material uses that will be consistent with the purpose and principles of the reactor framework. The specific procedures for applying these methods likely will differ because of substantial differences between: (1) nuclear reactors and the approximately 40 activities, systems, and devices that use nuclear materials; (2) reactor licensees and the more than 20,000 nuclear material licensees; and (3) the reactor regulatory program and the materials regulatory program, including the Agreement State program. In addition, a December 31, 1996, SRM concerning control and accountability of licensed devices directed the staff, in part, to establish probabilities associated with devices being lost, devices causing exposure to members of the public, devices entering the metals manufacturing stream, devices being smelted, and other incidents the staff recommended analyzing. The results of these efforts could provide tools for use in establishing a quantitative prioritization procedure more consistent with the procedure used for

reactor GSIs. Until such tools are available, the staff plans to continue using a qualitative prioritization procedure for non-reactor GSIs.

In addition to the formal documentation, prioritization, and tracking activities, there exist within the NRC other generic activities that are compliance-related and are identified, documented, tracked, and resolved within the individual program offices by office-specific systems. Selected documents from these office level programs will be on the internal computer network and will serve as a repository for generic safety activities that do not meet the definition of a GSI but require significant staff effort and may result in generic communications. The "NRC Generic Activities" Website, previously described in SECY-96-107, has been established to include the generic activities of RES, NRR, NMSS, and AEOD that form the basis for the identification of generic issues. This site is accessible to the public and staff on the NRC Home Page (<http://www.nrc.gov/NRC/reference.html>). By January 30, 1998, this site will also include the following information:

- (a) RES - NUREG-0933, which is the repository for all the agency's generic issues, and a status report based on GIMCS, which is the agency-wide GSI resolution tracking system. (GIMCS, which is a database system, will also be posted to the Website at a yet to be determined date pending resolution of the technical issues necessary to provide the public access to a dynamic database of NRC information.)
- (b) NRR - A quarterly status report that includes information on action plans and generic communications.
- (c) NMSS - GSIs (included in GIMCS) and Generic Communications.

The current internal AEOD Web Page lists AEOD studies and provides abstracts of most studies. In the future, AEOD will make the following information available on the NRC external Website: a list of technical reports by category; abstracts of completed studies; and a posting of major, current ongoing and future AEOD studies with completion schedules.

In addition to the above, the remaining requirements in the attached SRM called for NMSS to include RES in meetings to evaluate and assign priorities to NMSS GSIs, and for the staff to remain vigilant in its efforts to identify and resolve GSIs and to work with the industry in doing so. As a result, NMSS Policy and Procedures Letter 1-57, Revision 1, was issued in October 1997 to include a provision for RES to be invited to monthly operational events briefings where proposed GSIs will be discussed and evaluated, and priorities will be assigned.

The staff identified 22 generic issues, prioritized 17 (1 of which was designated HIGH), and resolved 5 since the briefing of the Commission in December 1995. The results of the staff's resolution efforts are documented in NUREG-0933 with progress on unresolved issues tracked in GIMCS. Over the years, the staff has worked with the industry, where possible, to resolve GSIs. The interactions have been issue-specific, primarily sponsored for the industry by owners' groups. The staff will continue to explore ways to work with the industry in finding resolutions to more unresolved GSIs.

RESOURCES:

The OCIO is working with RES to coordinate the input for the NRC Home Page and has budgeted resources for the completion of this effort. It is anticipated that, once it becomes functional, maintenance of the data on the Home Page will require no more additional resources than are currently being expended.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection to its issuance. The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objection. The Office of the Chief Information Officer has reviewed this paper for information technology impacts and has no objection.

original /s/ by Hugh L. Thompson, Jr.
L. Joseph Callan
Executive Director for Operations

Attachment: SRM 951219A

Distribution: OGC
CAA
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SECY
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J. Blaha
A. Summerour (WITS 9600088)
Central File
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IN RESPONSE, PLEASE
REFER TO: M951219A

January 19, 1996

MEMORANDUM James M. Taylor
TO: Executive Director for Operations
FROM: John C. Hoyle, Secretary /s/
SUBJECT: STAFF REQUIREMENTS - BRIEFING ON MECHANISM FOR ADDRESSING GENERIC SAFETY ISSUES, 10:00 A.M., TUESDAY, DECEMBER 19, 1995, COMMISSIONERS' CONFERENCE ROOM, ONE WHITE FLINT NORTH, ROCKVILLE, MARYLAND (OPEN TO PUBLIC ATTENDANCE)

The Commission was briefed by the NRC staff on the mechanism for addressing generic safety issues.

The Commission requested a summary of the staff effort expended in each office on generic issues.

(EDO)

(SECY Suspense: 3/8/96)

The Commission encouraged the Office of Nuclear Material Safety and Safeguards (NMSS) to include the Office of Nuclear Regulatory Research in meetings to evaluate and assign priorities to NMSS generic issues.

The staff should ensure that the respective roles of each office are understood and that close coordination is practiced to eliminate any duplication of effort. There should be one agency-wide generic issue resolution tracking system, coupled with consistency of prioritization between offices. It is important that the NRC continue to remain vigilant in its efforts to identify and resolve generic safety issues and to work with the industry in doing so.

The Commission requested the staff to review existing licensee costs associated with resolution of several of the most significant generic issues where licensee cost data is reasonably available in order to compare the actual licensee costs with those contained in the regulatory analyses and provide this comparison to the Commission.

(EDO)

(SECY Suspense: 4/26/96)

cc: Chairman Jackson
Commissioner Rogers
OGC
OCA
OIG
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)
PDR - Advance
DCS - P1-24