

POLICY ISSUE INFORMATION

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SECY-11-0101

FOR: The Commissioners

FROM: Brian W. Sheron, Director
Office of Nuclear Regulatory Research

SUBJECT: SUMMARY OF ACTIVITIES RELATED TO GENERIC ISSUES
PROGRAM

PURPOSE

This paper provides the annual update on the status of activities and continuing enhancements in the Generic Issues (GI) Program. Recent enhancements in the program include the review and disposition of 13 legacy LOW priority generic issues; clarification of the GI Program role regarding further actions on legacy licensing and regulatory impact GIs; improvements to the production and release of NUREG-0933, "Resolution of Generic Safety Issues;" issuance of the Office of Nuclear Regulatory Research (RES) Office Instruction (OI) TEC-002, "Procedures for Processing Generic Issues," dated September 29, 2010; issuance of a new report on Proposed GIs; and activities to promote understanding and use of the GI Program. In addition, this paper reports changes in the status of active GIs and estimated completion dates of their current major milestones. This paper does not contain any new commitments.

BACKGROUND

In a staff requirements memorandum (SRM) related to SECY-05-0126, "Summary of Activities Related to Generic Safety Issues," dated August 31, 2005 (Agencywide Document and Management System [ADAMS] Accession No. ML052430101), the Commission directed the

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U.S. Nuclear Regulatory Commission (NRC) staff to develop a plan focusing renewed attention to resolve older GIs and to ensure that future GIs are resolved in a timely manner. In response to the SRM, "Response to Staff Requirements Memorandum on SECY-05-0126, 'Summary of Activities Related to Generic Safety Issues'," dated March 29, 2006 (ADAMS Accession No. ML053570259), the NRC staff provided a plan to improve the timeliness in resolving open GIs.

Programmatic changes were instituted and subsequently implemented to ensure timely and effective resolution of GIs by issuance of the revision of Management Directive (MD) 6.4, "Generic Issues Program," dated November 17, 2009.

DISCUSSION

Status of GIs

Since the previous annual report to the Commission (SECY-10-0098), the NRC staff completed the safety/risk assessment for GI-199, "Implications of Updated Probabilistic Seismic Hazard Estimates in Central and Eastern United States for Existing Plants," in September 2010. In accordance with the safety/risk assessment panel recommendations, the lead responsibility for subsequent GI-199 actions was transferred to the Office of Nuclear Reactor Regulation (NRR) for regulatory office implementation. Implementation of revised MD 6.4 processes (such as development of an effective communication plan and coordination of the GI Program with other agency programs) facilitated completing the safety/risk assessment for GI-199 and moving this issue to the appropriate agency program for implementation.

Following the transfer of the lead responsibility for GI-199 to NRR, one reactor GI remains open in the safety/risk assessment stage. Four reactor GIs are open in the regulatory office implementation stage. There are no open nonreactor GIs.

GIs in Screening or Safety/Risk Assessment Stages

- GI-193, "Boiling-Water Reactor Emergency Core Cooling System [ECCS] Suction Concerns" (completion of safety/risk assessment estimated in August 2012). A series of experiments were conducted at Purdue University to study transport of bubbles to ECCS pump inlets. RES is in the process of evaluating test results to identify the path forward for this issue. RES is the lead office for GI-193.

GIs in Regulatory Office Implementation Stage

The following reactor GIs are being processed by NRR for regulatory office implementation:

- GI-186, "Potential Risk and Consequences of Heavy Load Drops in Nuclear Power Plants" (completion of all agency actions estimated in December 2011).
- GI-189, "Susceptibility of Ice Condenser and Mark III Containments to Early Failure from Hydrogen Combustion During a Severe Accident" (completion of all agency actions estimated in December 2011).

- GI-191, "Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance" (plans for completion of all agency actions will be determined following a Commission meeting in 2012).
- GI-199, "Implications of Updated Probabilistic Seismic Hazard Estimates in Central and Eastern United States for Existing Plants" (preparation of a Generic Letter is underway).

More information on active GIs can be found in the Generic Issue Management Control System (GIMCS) report. The GIMCS report is updated once each quarter to track and report the status of active GIs. The GIMCS report is available at the NRC public Web site on the GI Program Web page (<http://www.nrc.gov/about-nrc/regulatory/gen-issues.html>).

Closure of LOW Priority Legacy GIs

As described in the latest supplement to NUREG-0933, before changes were made in the GI Program in 1999, 13 GIs were given the priority ranking of LOW. NUREG-0933 states that a LOW priority ranking means that little or no prospect of substantial and worthwhile safety improvements existed by resolution of the issues. LOW priority rankings required the approval of the responsible office director and signified that the issue had been eliminated from further pursuit. However, SRM 871021A, "Staff Requirements – Briefing on Status of Unresolved Safety/Generic Issues," dated November 6, 1987, directed the staff to conduct periodic reviews of existing LOW priority GIs to determine whether any new information was available that would necessitate reassessment of the original prioritization evaluations. Reviews of LOW priority issues were performed and documented in NUREG-0933.

Prioritization of GIs was replaced with the screening process of MD 6.4 in 1999, and the staff discontinued using priority rankings. As a part of the improvements to NUREG-0933, the remaining 13 LOW priority issues that were prioritized in accordance with the legacy GI Program guidelines prior to publication of MD 6.4 received a final disposition. Staff evaluated each of the 13 LOW priority issues to confirm that the issues were addressed by current regulatory requirements, guidance, or oversight and that operating experience had not indicated a change in the significance of these issues. Based on the review of the LOW priority ranking issues documented in a memorandum from Benjamin Beasley to Brian Sheron, "LOW Priority Generic Issues," dated March 17, 2011 (ADAMS Accession No. ML092520025), the NRC staff changed their status to DROPPED. By changing the status of the LOW priority ranking issues, these issues will no longer be periodically assessed under the GI Program as directed by SRM 871021A.

The NRC staff evaluations, along with historical information regarding identification, prioritization, and resolution of these former LOW priority GIs, will be maintained in NUREG-0933.

Licensing and Regulatory Impact Issues

In the legacy GI Program, GIs that did not involve significant safety improvement elements were classified accordingly and noted for separate consideration outside the GI priority ranking process. These issues were classified as licensing issues (LIs), regulatory impact (RI) issues, or environmental issues (EIs). By the classification guidance in the legacy GI Program, these

issues are not directly related to protecting public health and safety. A listing of these issues, which have been given a NOTE 5 designation, can be found in Table II of NUREG-0933.

In accordance with MD 6.4, only those issues that meet all the GI Program screening criteria will be designated as GIs. The screening criteria are continuously applied throughout the GI process such that a proposed GI or a GI that subsequently fails to meet any of these criteria at any time will not continue to be processed in the GI Program. According to one of the screening criteria in MD 6.4, a GI potentially “affects public health and safety, the common defense and security, or the environment.” The purpose of this criterion is to eliminate issues not directly involving or affecting safety or security. Because LIs and RIs are not safety issues, these issues do not meet at least one of the GI Program screening criteria and do not warrant further processing in accordance with MD 6.4. As a part of the improvements to NUREG-0933, NRC will clarify that the GI Program will not pursue any further actions toward resolution of LIs and RIs.

Issuance of RES Office Instruction TEC-002

The November 2009 revision of MD 6.4 describes the agency policy for the GI Program and its legal basis. As described in the previous annual status report to the Commission (SECY-10-0098), this revision of MD 6.4 outlines programmatic changes in the GI Program and describes roles and responsibilities of NRC organizations in relation to the GI Program. To provide detailed guidance for RES staff in the implementation and management of the GI Program that is consistent with the revised MD 6.4, NRC staff issued a revision of RES OI TEC-002, “Procedures for Processing Generic Issues,” on September 29, 2010. This OI provides guidance for each stage of the program as well as guidance for the tracking of GIs and defines the roles and responsibilities of RES staff involved in the processing of GIs. Guidance provided in RES OI TEC-002 ensures an effective agencywide program for resolving, tracking, and reporting the status of GIs. RES staff is incorporating refinements and comments from other offices for a future revision of RES OI TEC-002.

Improvements to Production and Release of NUREG-0933

NUREG-0933 contains a description of the process and results of the resolution of each GI prioritized and resolved under the GI Program. NUREG-0933, which was first published in November 1983, has been regularly updated to include a description of newly identified GIs, GIs that have been closed out, and the major updates on the status of active GIs. To date, 33 supplements to NUREG-0933 have been issued. Supplements to NUREG-0933 add information about the identification, acceptance review, and screening stages for all newly identified GIs and document resolution of those issues with completed actions since publication of the previous supplement. In addition to information about GIs, NUREG-0933 includes a discussion of the current and historical GI Program.

NRC staff has initiated an effort to produce a more user-friendly version of NUREG-0933 using an appropriate software application. RES is working with the Office of Information Services to identify an application or system that will provide the desired capabilities. The new system will change the underlying technology and improve the efficiency of the workflow process for revising, producing, and distributing NUREG-0933 and will provide a framework for continued enhancement of NUREG-0933 and routine release of supplements. Internal and external stakeholders will benefit from the new version, which transforms the current version into a Web

tool and facilitates the rapid search and retrieval of information needed to aid in regulatory tasks or licensees' activities. The new version of NUREG-0933 also will be a valuable knowledge management tool providing efficient access to a wealth of historical information about GIs.

Issuance of the Semiannual Proposed GIs Report

To increase openness and provide accountability for the processing of potential GIs, the GI Program began issuing semiannual reports on the status of proposed GIs starting in July 2011. Proposed GIs constitute issues that are in one of the first three stages of the GI resolution process—identification, acceptance, or screening stages. Proposed GI reports will contain descriptions of the status of those proposed GIs that are active or have been recently closed.

Improve Awareness of the GI Program

NRC staff continues to promote understanding and use of the GI Program by disseminating information about the program and its activities. To provide key information about the program, the NRC staff has published a new brochure, NUREG/BR-0478, "The Generic Issues Program," which is enclosed with this paper. NUREG/BR-0478 provides a brief description of the GI Program process, products, and resources to NRC employees and the public. In addition, to provide information about the program processes, enhancements, and recent activities, GI Program staff has made informational presentations to the Advisory Committee on Reactor Safeguards and the NRC technical staff.

RESOURCES

The Office of the Chief Financial Officer has created a new GI Program financial tracking product. The new product includes GI Program resources in addition to resources expended by regulatory offices on implementation and verification of GIs. Because the NRR budget for FY 2012 includes the resources for regulatory office implementation, the NRR budget for FY 2012 has significantly increased from the FY 2011 budget.

FY 2012 contract support to the GI Program is reduced because the GI-193 contract was completed. For FY 2012, the staff estimates that the resources needed for these activities will total \$225k and 14.1 full-time equivalents (FTE). The FTE is fully funded in the FY 2012 budget.

Budgeted Resources for FY 2012 in Comparison to FY 2011

	FY 2011	FY 2012
RES	\$375k and 7.7 FTE	\$225k and 7.7 FTE
NRR	0.8 FTE	6 FTE
NMSS	0.2 FTE	0.2 FTE
FSME	0.1 FTE	0.1 FTE
NRO	0.1 FTE	0.1 FTE

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COORDINATION

The Office of the General Counsel has reviewed this SECY paper and has no legal objection, but has not reviewed the document addressing the change to the status of legacy LOW priority issues (ADAMS Accession No. ML092520025) and RES OI TEC-002. The Chief Financial Officer reviewed this package and determined that it has no financial impact.

/RA/

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Enclosure:

[NUREG/BR-0478, "The Generic Issues Program," Rev. 1](#)