

October 28, 1999

MEMORANDUM TO: William D. Travers
Executive Director for Operations

FROM: Annette Vietti-Cook, Secretary /s/

SUBJECT: STAFF REQUIREMENTS - SECY-99-191 - MODIFICATIONS TO THE SAFETY GOAL POLICY STATEMENT

The Commission has disapproved the staff's recommendation to proceed with a study of the feasibility of developing overarching safety principles as being premature in light of the ongoing efforts to transition to more risk-informed regulation. This effort should be delayed until experience is gained from the current changes to our regulatory structure so that we can build on a robust foundation. This approach should build on our experience with operational safety, deterministic analysis, and risk-informed methods. Instead of using a top-down approach to develop the overarching safety principles and define adequate protection, we should use a bottom-up approach. This guidance is not meant to supersede previous Commission guidance associated with [SECY-99-100](#). However, in implementing this guidance, should the staff identify areas where this guidance cannot be reconciled with previous Commission guidance on SECY-99-100, the staff should forward the issue to the Commission for resolution. The staff should work to bolster and clarify how it makes its findings of reasonable assurance and should enhance and verify the bases and premises for its determinations as new methodologies and technology permit. This process should not only improve the Commission's specific findings but, lead to a more refined description of the meaning of "reasonable assurance" of adequate protection.

The staff should still provide a recommendation to the Commission on whether to modify the current Safety Goal Policy Statement.

(EDO)

(SECY Suspense: 3/30/2000)

cc: Chairman Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield
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