

February 3, 2000

MEMORANDUM TO: William D. Travers  
Executive Director for Operations  
FROM: Annette Vietti-Cook, Secretary /s/  
SUBJECT: STAFF REQUIREMENTS - SECY-99-264 - PROPOSED STAFF PLAN FOR RISK-INFORMING  
TECHNICAL REQUIREMENTS IN 10 CFR PART 50

The Commission has approved the staff's plan for performing the study phase of its work to risk-inform the technical requirements in [10 CFR Part 50](#) subject to the comments provided below.

1. The staff should ensure that the criteria used to screen, prioritize, and determine the scope and feasibility of changes to technical requirements in 10 CFR Part 50, are consistent and compatible with other ongoing efforts related to risk-informed regulation, including:
  - a. Implementation of risk-informed processes as described in [SECY-99-246](#) and [SECY-99-256](#);
  - b. Implementation of the risk-informed plant oversight program; and
  - c. Possible modification of the Safety Goal Policy Statement.
2. Policy issues connected with the development of a risk-informed regulatory system should be highlighted for resolution by the Commission as early as possible during this process. These include, but are not limited to, issues related to the concept of defense-in-depth, as discussed in the ACRS's letter of October 12, 1999.
3. The staff should consider Commission guidance in [SRM 991109A](#) (Nuclear Materials and Waste Activities Stakeholders Meeting), regarding accommodation of stakeholders with little or no Internet access or awareness.
4. In the context of risk informing technical requirements, the staff should also review safety issues noted in Part 50 as being "under consideration" or "under development," e.g., the issues of postulated breaks in the reactor coolant pressure boundary and failures of passive components in fluid systems, as discussed in footnotes 1 and 2 to the Definitions and Explanations of Appendix A, and consider their resolution.
5. The staff should consider the value of risk-informing Appendices [A](#) and [B](#) to Part 50 and their relationship with defense-in-depth.
6. As this initiative proceeds, the staff should develop a communication plan which facilitates greater stakeholder involvement in, and understanding of, the goals of the initiative, the options we are considering, the course (roadmap) we ultimately set, and the milestones we intend to meet. The staff should actively seek stakeholder participation in each step of the Phase 1 work, especially the identification and prioritization of candidate changes to requirements and design basis accidents.

cc: Chairman Meserve  
Commissioner Dicus  
Commissioner Diaz  
Commissioner McGaffigan  
Commissioner Merrifield  
OGC  
CIO  
CFO  
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Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)  
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