

March 28, 2003

MEMORANDUM TO: William D. Travers
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary */RA/*

SUBJECT: STAFF REQUIREMENTS - SECY-02-0176 - PROPOSED
RULEMAKING TO ADD NEW SECTION 10 CFR 50.69, "RISK-
INFORMED CATEGORIZATION AND TREATMENT OF
STRUCTURES, SYSTEMS, AND COMPONENTS"

The Commission has approved publishing the proposed rule and related draft regulatory guidance concerning the risk-informed categorization and treatment of structures, systems, and components, subject to the following comments.

1. The staff should ensure that development of the rule proceeds in parallel with the issuance of the PRA standard and associated guidance.
2. The staff should ensure that adequate review guidance (i.e., a review standard) is developed in order to ensure that these reviews are conducted in an objective, consistent, complete and timely manner.
3. Relevant operational experience should be evaluated in an ongoing manner with the aim of reducing the uncertainty in assessing the effect of treatment on reliability and common-cause failures.
4. The staff should ask for specific comment in the Statements of Consideration on whether NRC should amend 50.69(c)(1)(i) to require a comprehensive high-quality PRA. For example, "This PRA should be a level 2 internal- and external-initiating event all mode PRA, which has been subjected to a peer review process and submitted to and endorsed by the NRC."
5. The staff should assess the details of any Reactor Oversight Process changes needed to address issues that may arise from licensees who implement this rulemaking. The staff should provide its assessment of the potential impact on future inspection efforts associated with licensee implementation in the final rulemaking package.
6. The staff should ask for specific comment in the Statements of Consideration on whether NRC should modify the rule to provide for NRC review and approval of a licensee's proposed treatment for RISC-3 SSCs.

7. As a separate effort, the staff should take a more fundamental look at NRC quality assurance requirements to determine whether they are effectively and efficiently achieving their intended outcomes.

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