

May 19, 2014

MEMORANDUM TO: Mark A. Satorius
Executive Director for Operations

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

SUBJECT: STAFF REQUIREMENTS – SECY-13-0132 – U.S. NUCLEAR
REGULATORY COMMISSION STAFF RECOMMENDATION
FOR THE DISPOSITION OF RECOMMENDATION 1 OF THE
NEAR-TERM TASK FORCE REPORT

The Commission has disapproved the staff's proposed Improvement Activity 1, "Establish a Design-Basis Extension Category of Events and Associated Regulatory Requirements," Improvement Activity 2, "Establish Commission Expectations for Defense in Depth," and Improvement Activity 3, "Clarify the Role of Voluntary Industry Initiatives in the NRC Regulatory Process," as written.

The objectives of Improvement Activities 1 and 2 should be reevaluated, as appropriate, in the context of the Commission direction on a long-term Risk Management Regulatory Framework (RMRF), more specifically, the proposed policy statement. Work on the RMRF and other interrelated activities should be treated outside the scope of the NRC's post-Fukushima actions. With these decisions, the Near-Term Task Force Report Recommendation 1 is closed.

SECY-13-0132, Enclosure 3, "Defense-in-Depth Observations and Detailed History, should be enshrined as an agency knowledge management tool and republished in other formats to make it more widely available.

For Improvement Activity 3, the Commission has only approved the proposal to evaluate the current status of implementation on the most risk or safety significant Type 2 initiatives and verify that these voluntary initiatives are being adequately implemented. The staff should provide the Commission with the results of this verification process and any recommended improvements, if warranted, for its review and approval.

Finally, the staff should also include in the upcoming Commission Paper on the RMRF a description of any interrelationships of ongoing risk-informed initiatives to ensure the activities are well coordinated, and effectively planned and implemented. To the extent practical the ongoing activities should include those activities the staff feels are interrelated, and as a minimum, should include:

- a. the RMRF working group development of "a policy to establish a common risk management regulatory framework that has consistent implementation elements to be applied to all NRC licensed uses of byproduct, source and special nuclear materials";

- b. the SECY paper being developed as directed in the SRM for COMGEA-12-001/COMWDM-12-0002 to evaluate using a site specific, risk-informed approach for prioritizing regulatory actions;
- c. the efforts of the NRC's Risk-Informed Steering Committee to address a number of policy and technical issues related to the use of PRA in risk-informed regulatory decision making;
- d. industry related initiatives, such as the December 2011 EPRI Report 1022997, entitled, "Identification of External Hazards for Analysis in Probabilistic Risk Assessment," and tabletop exercises to explore regulatory prioritization; and
- e. staff efforts to address the defense-in-depth direction in SRM-SECY-11-0014.

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
OGC
CFO
OCA
OPA
Office Directors, Regions, ACRS, ASLBP (via E-Mail)
PDR