



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 30, 1999

MEMORANDUM TO: Theodore S. Sherr, Chief  
Licensing and International Safeguards Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

Philip Ting, Chief  
Operations Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

FROM: Melanie A. Galloway, Acting Chief  
Special Projects Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

SUBJECT: BULLETIN 91-01 REVIEW PROCESS

Because the reporting of criticality safety events involving the violation of the double contingency principle can indicate safety, licensing, or regulatory issues which warrant NRC management attention, the Special Projects Branch is proposing that a team, comprised of representatives of each FCSS branch, be established within FCSS to review submitted Bulletin 91-01 reports on a regular basis and submit the results of its reviews to FCSS management with appropriate recommendations. The Special Projects Branch further proposes, given the high incidence of Bulletin 91-01 reports from the gaseous diffusion plants, that Mr. Larry Berg serve as chair of the team. Recommended team representatives are Mr. Dennis Damon (Licensing and International Safeguards Branch) and Ms. Sheryl Burrows (Operations Branch). The team will review the significance of criticality safety event reports on at least a monthly basis, and recommend to management such additional actions as requesting additional information, suggesting inspection followup, or performing on-site licensing reviews. Event significance will be evaluated by the team using the following criteria:

1. Does the report indicate which criticality safety parameters were impacted during the event? Does the report indicate whether the lost or degraded control solely protects the NCS parameter or provides defense in depth with at least one other control? Does the report indicate the significance of the loss of control (e.g., actual spacing to adjacent fissile bearing equipment)? Does the report indicate whether the as found condition is within the analyzed safety basis of the NCSE?
2. Based on the information in the report, does the failure of the control result in a decrease in effectiveness or reliability of the remaining controls associated with the impacted NCS parameter?
3. How many times has the situation of this lost or degraded control occurred at this particular facility?

2000-224

NRC FILE CENTER COPY

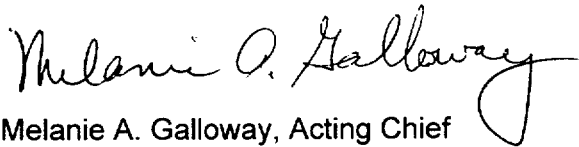
DF03

PDR ORG NOMA

Because the then Division Director and Deputy Division Director of FCSS have endorsed this concept previously, we are proposing that the team begin its function in January. While meetings are anticipated to occur monthly, an increased frequency may be required on occasion due to the volume of event reports. Mr. Larry Berg will contact Mr. Dennis Damon and Ms. Sheryl Burrows to coordinate the meeting time and place and event reports for review. Team members should have reviewed the event reports to be discussed prior to the meeting. This activity should not require more than 10% of each of the member's time. The first meeting will also focus on a plan for how the team will carry out its function.

Should you have any suggestions for further improving the team's function, please contact me or Larry Berg.

Sincerely,

A handwritten signature in black ink that reads "Melanie A. Galloway". The signature is written in a cursive style with a large, looping 'y' at the end.

Melanie A. Galloway, Acting Chief  
Special Projects Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

December 30, 1999

-3-

Because the then Division Director and Deputy Division Director of FCSS have endorsed this concept previously, we are proposing that the team begin its function in January. While meetings are anticipated to occur monthly, an increased frequency may be required on occasion due to the volume of event reports. Mr. Larry Berg will contact Mr. Dennis Damon and Ms. Sheryl Burrows to coordinate the meeting time and place and event reports for review. Team members should have reviewed the event reports to be discussed prior to the meeting. This activity should not require more than 10% of each of the member's time. The first meeting will also focus on a plan for how the team will carry out its function.

Should you have any suggestions for further improving the team's function, please contact me or Larry Berg.

Sincerely,

signed by M. Galloway

Melanie A. Galloway, Acting Chief  
Special Projects Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

Distribution:

~~NRC File Center~~ PUBLIC NMSS r/f FCSS r/f  
DDamon SBurrows JDavis Wschwink MWeber

G:\SPB\LJB2\Charter.wpd

(\*See previous concurrence)

OFC	SPB	6	SPB		SPB		SPB	E	SPB	E
NAME	LBerg:al		*CCox		*YFaraz		DHooley		MGalloway	
DATE	12/ 30 /99		12/ 22 /99		12/22 /99		12/ 30 /99		12/ 30 /99	

C = COVER

E = COVER & ENCLOSURE

N = NO COPY

OFFICIAL RECORD COPY

or provides defense in depth with at least one other control. Does the failure of the control, thus, result in a decrease in effectiveness or reliability of the remaining controls associated with the impacted NCS parameter. Does the report inform the staff of the severity of the loss of control (e.g., actual spacing to adjacent fissile bearing equipment). Does the event report indicate whether the as found condition is still within the analyzed basis of safety in the NCSE.

3. How many times has the situation of this lost or degraded control occurred.

The event reporting review process will meet monthly beginning in January. Mr. Larry Berg will contact Mr. Dennis Damon and Ms. Sheryl Burrows to coordinate the meeting time and place. It is expected that the individual reviewers will have reviewed and commented on the event reports to be discussed prior to the meeting.

Sincerely,

*Acting*  
Melanie A. Galloway, Chief  
Special Projects Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

Distribution:

NRC File Center PUBLIC NMSS r/f FCSS r/f  
DDamon SBurrows JDavis WSchwink *MWeber*

G:\SPB\JB2\Charter.wpd

OFC	SPB	<i>6</i>	SPB		SPB	<i>C</i>	SPB		SPB			
NAME	LBerg:al	<i>SP</i>	CCox		YFaraz	<i>YAF</i>	DHoadley		MGalloway			
DATE	12/22/99		12/22/99		12/22/99		12/ /99		12/ /99			

C = COVER

E = COVER & ENCLOSURE

N = NO COPY

OFFICIAL RECORD COPY

or provides defense in depth with at least one other control. Does the failure of the control, thus, result in a decrease in effectiveness or reliability of the remaining controls associated with the impacted NCS parameter. Does the report inform the staff of the severity of the loss of control (e.g., actual spacing to adjacent fissile bearing equipment). Does the event report indicate whether the as found condition is still within the analyzed basis of safety in the NCSE.

3. How many times has the situation of this lost or degraded control occurred.

The event reporting review process will meet monthly beginning in January. Mr. Larry Berg will contact Mr. Dennis Damon and Ms. Sheryl Burrows to coordinate the meeting time and place. It is expected that the individual reviewers will have reviewed and commented on the event reports to be discussed prior to the meeting.

Sincerely,

Melanie A. Galloway, Acting Chief  
Special Projects Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

Distribution:

NRC File Center PUBLIC NMSS r/f FCSS r/f  
DDamon SBurrows JDavis Wschwink MWeber

G:\SPB\LJB2\Charter.wpd

(\*See previous concurrence)

OFC	SPB	<i>E</i>	SPB		SPB		SPB		SPB	
NAME	LBerg:al <i>al</i>		*CCox		*YFaraz		DHoadley		MGalloway	
DATE	12/ /99		12/ 22 /99		12/22 /99		12/ /99		12/ /99	

C = COVER

E = COVER & ENCLOSURE

N = NO COPY

OFFICIAL RECORD COPY