



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 3, 2000

RELEASED TO THE PDR

2/3/00 *DKW*
date initials

SECRETARY

MEMORANDUM TO: William D. Travers
Executive Director for Operations

FROM: Annette Vietti-Cook, Secretary *Annette Vietti-Cook*

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

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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
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