

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: Melvyn Leach, Acting Chief
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

SUBJECT: BULLETIN 91-01 REVIEW PROCESS: REVISED PROPOSAL

This responds to your memorandum concerning our December 30, 1999, proposal to establish a nuclear criticality safety (NCS) event review committee. What the Special Projects Branch (SPB) is now proposing is that a team, composed of representatives from each branch in the Division of Fuel Cycle Safety and Safeguards (FCSS), be established to review submitted Bulletin 91-01 reports on a regular basis and submit the results of its reviews to FCSS management with appropriate recommendations. We recommend that the team consist of one member each from the SPB, Operations Branch (FCOB), and Licensing and International Safeguards Branch (FLIB). The recommended team representatives are Mr. Larry Berg, Mr. Dennis Damon, and Ms. Sheryl Burrows. We recognize, however, that each branch has the authority to choose its own representatives on the committee. You raised the concern that the chairmanship of the committee should be rotated every six months; SPB now concurs. We would propose that, because of the high incidence of 91-01 reports from the gaseous diffusion plants, Mr. Larry Berg be appointed as Chairman for the first six months.

Concerning your other comments, SPB does not believe that the review committee should be a subcommittee of the Criticality Safety Committee, and does not concur that its membership and charter should be approved by the Criticality Safety Committee. However, we recognize that the review committee may raise generic policy issues that should be discussed by the Criticality Safety Committee. We believe therefore that this new review committee should interface with the Criticality Safety Committee and should refer generic NCS issues to the Criticality Safety Committee for its consideration. A TAC number would need to be established to track effort spent in this review.

Moreover, SPB recognizes that the various branches within FCSS have functional requirements with regard to operational event response. The fact that the review committee would only meet on a monthly basis demonstrates that we recognize this committee does not usurp the branches' requirements with regard to immediate event response. Instead, the purpose of this committee would be to review 91-01 events for generic implications that are of potential interest to all branches within FCSS, and also for long-term safety and performance trends, rather than for immediate response.

The SPB therefore proposes that the review committee meet on a monthly basis, or more often as circumstances may require; that it will review the significance of each 91-01 event that has occurred since the last meeting; and that it will recommend to FCSS management such actions as requesting additional information, suggesting inspection followup, or performing on-site licensing reviews. Event significance will be evaluated using the criteria spelled out in our December 30, 1999, memorandum, and restated below:

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?

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 March, 2000. Mr. Larry Berg will contact your designated representatives to coordinate the meeting time and place and event reports for review, and to establish procedures for conducting the review and documenting the results.

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

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