

REGULATORY ANALYSIS

DRAFT REGULATORY GUIDE DG-1288 AN APPROACH FOR USING PLANT-SPECIFIC RISK-INFORMED DECISIONMAKING FOR INSERVICE INSPECTION OF PIPING (Proposed Revision 2 of Regulatory Guide 1.178, dated September 2003)

Statement of the Problem

This is proposed Revision 2 to Regulatory Guide (RG) 1.178. Since the last revision of this RG, the relevant PRA standard has been revised, associated or supporting documents have been developed or revised, and review practices have evolved. Therefore, revision of this regulatory guidance is necessary to incorporate these developments.

Objective

The objective of this regulatory action is to improve the utility of this regulatory guidance in light of the developments identified above.

Alternative Approaches

The U.S. Nuclear Regulatory Commission (NRC) staff considered the following alternative approaches:

Do not revise Regulatory Guide 1.178, or
Revise Regulatory Guide 1.178.

Alternative 1: Do Not Revise Regulatory Guide 1.178

Under this alternative, the NRC would not revise guidance, and the current guidance would be retained. If NRC does not take action, there would not be any changes in costs or benefit to the public, licensees or NRC. However, the “no-action” alternative would not address identified concerns with the current version of the regulatory guide [or in the absence of NRC guidance, for a new guide]. The NRC would continue to review each application on a case-by-case basis. This alternative provides a baseline condition from which any other alternatives will be assessed.

Alternative 2: Revise Regulatory Guide 1.178

Under this alternative, the NRC would revise Regulatory Guide 1.178. This revision would incorporate the latest information in the PRA standard, supporting guidance, and review practices. By doing so, the NRC would ensure that the RG guidance available in this area is current, and accurately reflects the staff’s position.

The impact to the NRC would be the costs associated with preparing and issuing the regulatory guide revision. The impact to the public would be the voluntary costs associated with reviewing and providing comments to NRC during the public comment period. The value to NRC staff and its applicants would be the benefits associated with enhanced efficiency and effectiveness in using a common guidance document as the technical basis for license applications and other interactions between the NRC and its regulated entities.

Conclusion

Based on this regulatory analysis, the NRC staff recommends revision of Regulatory Guide 1.178. The staff concludes that the proposed action will enhance the efficiency and effectiveness of related regulatory reviews.