

September 6, 2000

MEMORANDUM TO: Lawrence E. Kokajko, Section Chief
Risk Task Group
Office of Nuclear Material Safety and Safeguards

FROM: Thomas L. King, Director /RA/
Division of Risk Analysis & Applications
Office of Nuclear Regulatory Research

SUBJECT: NMSS CASE STUDIES

Your August 18, 2000, memorandum provided for comment a draft plan for using risk-informed approaches in NMSS, including the use of case studies to aid in establishing a framework for the approaches. Overall, the plan, including the use of case studies, appears to be a practical and comprehensive way to identify issues and test risk-informing NMSS activities.

I offer the following comments to help in implementation of the plan:

- Objective 1 is listed as producing a final version of the NMSS screening criteria. To be consistent with the Risk-Informed Regulation Implementation Plan (RIR-IP), it would be better to state the objective as providing input to the final version of the Agency screening criteria. We are working toward an Agency-wide set of criteria and I believe the criteria developed by NMSS are a good model to use.
- The draft screening criteria should be replaced with the criteria presented at the August 22, 2000, meeting with NMSS staff.
- A fourth objective and success measure are suggested for the case studies:
 - Objective 4: Identify methods, data and guidance needed to implement a risk-informed regulatory approach
 - Success Measure: Develop the risk-informed regulatory approach sufficient to define the methods, data and guidance needed and the feasibility of developing them.
- Does the scope of the 8 identified case study areas include assessing how risk information could improve NRC's own internal process (e.g., inspection, enforcement, review of operating experience) or just requirements on licensees? To ensure consistency, both should be included. Also, assessing requirements on licensees should include rules, R.G. s, SRPs.

- The scope of the case studies should be expanded to include and test the entire risk-informed framework (e.g., defense-in-depth), not just Safety Goals.
- No mention is made of schedule for the case studies. Target dates should be provided.
- Are the results of all 8 case studies to be summarized in one commission paper, or individual papers?
- What is the role of other offices (e.g., RES, OGC) in the case studies?

cc: M. Virgilio, NMSS
M. Bailey, NMSS

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