

December 11, 2000

Dr. Dana A. Powers
Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: PROPOSED FRAMEWORK FOR RISK-INFORMED CHANGES TO THE
TECHNICAL REQUIREMENTS OF 10 CFR PART 50

Dear Dr. Powers:

Your letter of November 20, 2000, discussed the staff's recent work on the above subject Framework. This Framework document provides guidelines to the staff for identification and development of risk-informed changes to the technical requirements of 10 CFR Part 50 and is described in SECY-00-0198. Your letter provided several observations and recommendations on the staff's work. We agree with the Committee's observations and recommendations. Specifically, with regard to recommendations we intend to proceed as follows:

ACRS Recommendation 1: We recommend that the tactics for implementing defense in depth be clarified. Will defense in depth be applied at all levels of the framework? Will it be invoked at lower tiers when it has already been applied to the top tiers?

Staff Response: We agree that the tactics for implementing defense in depth need to be clarified. In the next revision of the framework, the discussion will be expanded and will succinctly describe where and how the tactics are employed in regard to defense in depth.

ACRS Recommendation 2: For uncertainties that are included in the PRA, the rationalist approach should be followed (i.e., appropriate safety margins and redundancy, and diversity would be developed by quantitative analyses). Even though the framework is consistent with this approach, an expanded discussion of these issues would be beneficial.

Staff Response: We agree and in the next revision of the framework, the discussion will be expanded to describe how the issues (e.g., safety margins) are treated.

ACRS Recommendation 3: The treatment of events (e.g., earthquakes) that affect more than one cornerstone extensively should be discussed.

Staff Response: We agree and in the next revision of the framework, the discussion will be expanded to describe how these types of events are treated.

The staff will continue to interact with the ACRS on these issues as progress is made in the application of the framework to developing risk-informed alternative regulations.

Sincerely,

/RA/

William D. Travers
Executive Director
for Operations

cc: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield
SECY

NAME: g:\letter to ACRSon framework dec 00.wpd

Distribution: DRAA Chron, Drouin, Drouin r/f, Cunningham, King, Federline, Thadani, Summerour, ACRS File, Miraglia, Norry, J. Craig, Burns, Cyr, Schoenfeld, Collins, Paperiello, Travers

RES number 2000268, EDO Number 20000543

Package: ML003774319

OAR in ADAMS? (Y or N) Y ADAMS ACCESSION NO.: ML003774311 TEMPLATE NO. EDO-002

Publicly Available? (Y or N) Y

DATE OF RELEASE TO PUBLIC _____

SENSITIVE? N

(RES File Code) RES _____

* Previously concurred.

| | | | | | | |
|--------|-------------------|--|---------------------|--------|-------------|--|
| OFFICE | PRAB/DRAA/RES | | PRAB/DRAA/RES | | DRAA/RES | |
| NAME | *MDrouin | | MCunningham mxd for | | TKing | |
| DATE | 11/29/00 | | 11/29/00 | | 11/30/00 | |
| OFFICE | NRR | | RES:D | DEDMRS | EDO | |
| NAME | *SCollins bws for | | *AThadani tlk for | | CPaperiello | |
| DATE | 12/3/00 | | 11/30/00 | | 12/8/00 | |
| | | | | | 11/11/00 | |

PARALLEL CONCURRENCE

ROUTING AND TRANSMITTAL SLIP

DATE:11/29/00

MEMORANDUM TO: Dana Powers

FROM: W. Travers

SUBJECT: PROPOSED FRAMEWORK FOR RISK-INFORMED CHANGES TO
THE TECHNICAL REQUIREMENTS OF 10 CFR PART 50

ORIGINATOR/SECRETARY: ROOM NO./BLDG: T10 C 24

Patty Nielsen PHONE NO.: 415-6189

| <u>SIGN AND/OR</u> | <u>CONCUR</u> | <u>DATE</u> |
|--------------------|---------------|-----------------|
| 1. MDrouin | _____ | <u> / / </u> |
| 2. MCunningham | _____ | <u> / / </u> |
| 3. TKing | _____ | <u> / / </u> |
| 4. SCollins | _____ | <u> / / </u> |
| 5. AThadani | _____ | <u> / / </u> |
| 6. CPaperiello | _____ | <u> / / </u> |
| 7. WTravers | _____ | <u> / / </u> |

DUE TO EDO 12/20/00

| | | |
|---------------|-------------------|----------------|
| ACTION: | CIRCULATED: | FOR YOUR INFO: |
| APPROVAL: | COMMENT: | SEE ME: |
| AS REQUESTED: | NOTE & RETURN: | PREPARE REPLY: |
| COORDINATION: | PER CONVERSATION: | |
