

January 16, 2001

NOTE TO: John W. Craig, Assistant for Operations, OEDO

FROM: Ashok C. Thadani, Director, RES **/RA/**

SUBJECT: DATES FOR MANAGEMENT DIRECTIVE 6.4

The December 8, 2000, edition of the Commission tracking system lists this office as being 518 days late in issuing Management Directive (MD) 6.4. This tracking item implies that a final MD was due for issuance on or before 7/30/99. In actuality, the 7/30/99 due date was intended for a draft MD, not a final. The draft MD was issued for trial use as requested by the ACRS on July 21, 1999.

The actual situation is as follows:

- An initial self-assessment of the Generic Issue Program (GIP) was conducted over the period June-August 1998.
- Work to restructure the GIP was ongoing throughout the first two quarters of FY 1999.
- On April 9, 1999, a partially completed Draft MD 6.4, "Generic Issue Program," and Draft Handbook 6.4, "Generic Issue Program Handbook" was issued for peer review.
- Office comments were used to fully develop the MD, and on July 21, 1999, the Draft MD 6.4 was forwarded for pilot use beginning in August 1999. This accomplishment corresponds to the milestone listed in the Commission tracking system. The trial use period was recommended by the ACRS. After this trial use is completed, lessons learned will be assessed, implemented, and a final MD will be issued.
- In September 1999, OGC requested that additional changes be made to the Draft MD. A revised version of MD 6.4 was issued on October 21, 1999.
- Trial use of the MD was recently initiated with Candidate Generic Issues (1) GI-186, "Potential Risk and Consequences of Heavy Load Drops in Nuclear Power Plants," (2) GI-187, "Potential Impact of Postulated Cesium Concentration on Equipment Qualification in the Containment Sump," and (3) GI-188, "Resonance Vibrations of Generator Tubes Following a Main Steam Line Break Event." Because these issues did not arise until late in 2000, only the very early stages of the generic issue process have been completed for these candidate generic issues.

Therefore, the milestone in the Commission tracking system should be changed from, "Issue New Management Directive MD 6.4, 'Generic Safety Issues,' (Final 12/00)" to "Issue Draft Management Directive MD 6.4, 'Generic Safety Issues,'" and the status should state, "completed 7/21/99."

A new milestone could be added for issuing the final MD. The SRM for SECY-98-001 does not specify a date for final issuance. We have been working based on a letter from the EDO to the ACRS, which simply states that, "once the pilot study for the MD has been completed and lessons learned have been addressed, you will be briefed on our findings." We plan on briefing the ACRS in March 2001 on lessons learned during the initial trial period for the draft MD. At this point, it appears that we will be recommending a few changes in the draft MD. Given the importance of this management directive, the end of June appears to be a reasonable target for issuing the MD in final form.

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