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One aspect of the risk-informed approach outlined in Reg Guide 1.174 is performance monitoring. This means that when we approve a risk-informed industry initiative, we should track the important parameters to see if the estimated level of risk is actually being achieved. In the maintenance rule, this means tracking equipment reliability and availability.

As we move toward resolution of the spent fuel pool risk study, we need to ask ourselves what parameters should be monitored, by the licensee and/or the inspection program, to assure the desired level of risk is being met. Moreover, in accordance with the new oversight process, we should think about what thresholds of performance would trip the various levels of NRC response; green, white, yellow and red. For example, if we track heavy load movements, one human error might be green, but an actual dropped cask would be red.

Gareth is most familiar with the new oversight process and the associated significance levels. Maybe he can give it a first look.

--Rich

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