

From: Steven Long *NRR*
To: Michael Johnson; Richard Correia *NRR*
Date: 6/25/01 4:50PM
Subject: Re: Fwd: 4th try at Q1 Response

Mike,

We aren't making progress.

In your revision, you again have removed the description of the issue and added words that imply there should be no problems. This is the same result that I have received for all 4 of my attempts to write the response to this question in a manner acceptable to IIPB. Although IIPB has never explicitly stated an objection to including a description of this issue, it has become obvious that no version that includes a clear description will be accepted by IIPB.

I am not willing to delete the issue description. The questioner is asking about the adequacy of the ROP procedures with respect to situations involving multiple items with compounding effects on risk. This complication in dealing with such situations certainly is relevant to his/her question. It should be obvious to everybody concerned that the questioner wants an answer that is acceptable to a risk analyst, not just to somebody who wrote the procedures he/she is questioning. Yet, IIPB has blocked the agency's response for months now by repeatedly rewriting the answer to delete the description of this issue.

Since, as we agree, the SDP does not now provide clear guidance on this issue, it is appropriate to describe it clearly enough that a reader can at least understand what the issue is about. Then, as your suggested revision says, we all can deal with it explicitly on a case by case basis until we gain enough experience to write out clear guidance for future cases. This is the truth, and I don't see how it threatens IIPB to discuss it openly.

I have appended a slight modification to my latest version. If that is not acceptable to IIPB, then we are at an impasse. In that event, I suggest that we escalate this to the division director level.

Steve

>>> Michael Johnson 06/25/01 02:42PM >>>
Rich.

Revised version is attached.

Mike

CC: Doug Coe; Patrick Milano; Peter Wilson

J/78

However, the issue raised by this question might be more important for other cases where the individually-evaluated risk estimates for the separate findings are not so significant. For example, in some circumstances, the combined risk of two "white" findings or a "white" and a "yellow" finding could exceed the threshold for "red" significance. That would be an important consideration for determining our regulatory response. With that in mind, the written SDP procedures have been revised to make it clear that it is our intent to consider the combined risk effects of concurrent conditions. The use of this combined risk estimate in the ROP Action Matrix is not necessarily a simple process. The combined risk estimate cannot be assigned to more than one of the findings without over-counting the total risk of the situation. In some cases, it may be appropriate to combine the findings into one and assign it the significance of the total risk. In other cases, it might be more appropriate to apportion the total risk among the separate findings on the basis of their relative importance to the total. For the present, our intent is to consider the various possible alternatives for each case and select the one that, in our judgement, is most representative of the risk implications for each specific case. In making that judgement, we will be mindful of any differences in regulatory actions that may be specified by the ROP Action Matrix for the various possible combinations of the numbers and associated colors of the findings. As we gain experience with this potential concern, we will continue to consider whether it is feasible desirable to make process enhancements that provide clearer guidance.