

August 4, 2003

MEMORANDUM TO: Charles E. Ader, Chairman
Committee To Review Generic Requirements

FROM: Jack R. Strosnider, Deputy Director / RA /
Office of Nuclear Regulatory Research

SUBJECT: REQUEST TO WAIVE REVIEW OF PROPOSED REVISIONS TO
REGULATORY GUIDE 1.178, "AN APPROACH FOR PLANT-SPECIFIC
RISK-INFORMED DECISIONMAKING FOR INSERVICE PIPING," AND
THE ASSOCIATED STANDARD REVIEW PLAN CHAPTER 3.9.8.

In accordance with the Commission's Risk-Informed Implementation Plan (SECY-02-0131, July 12, 2002), the staff has prepared revisions to RG 1.178 and SRP Chapter 3.9.8. Attached for your information are copies of the draft revised RG and SRP (Attachments 1 and 2). To aid in identifying the areas of revision, red-line strike-out versions of these documents are included (Attachments 3 and 4), and Attachment 5 gives a brief description of the changes.

Some history of these documents is as follows. These documents were initially issued for trial use in July 1998. The revisions that have been made to the two documents are based on the staff's experience during the trial use period involving the review and approval of numerous plant-specific relief requests for inservice inspection. On March 13, 2003, the staff held a public meeting to discuss the revised drafts. Some minor editorial comments were provided which were incorporated in the drafts. On May 8, 2003, the staff briefed the ACRS on the proposed revisions, and in a letter dated May 16, 2003, the ACRS recommended that the staff proceed to issue the revised documents (Attachment 6).

As previously discussed with you, the staff is requesting to waive CRGR review of the revised Regulatory Guide 1.178 and the associated Standard Review Plan Chapter 3.9.8. In support of this request, it is noted that the guidance contained in these documents does not involve a backfit, and they were reviewed by the CRGR in 1998 when they were first issued. As indicated in Attachment 5 that discusses the nature of the document revisions, the revisions are mainly editorial in nature. If you have any questions regarding the revisions to RG 1.178 and the SRP, please contact Brad Hardin at (301) 415-6561.

Attachments: As stated

DOCUMENT NAME: G:\Rg-1.178\RG.SRP.CRGR.7.16.03

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Package No.: REQUEST TO WAIVE REVIEW OF PROPOSED REVISIONS TO
REGULATORY GUIDE 1.178, ML 032170422

Attachment 1: Proposed revised RG 1.1768, ML031190593

Attachment 2: Proposed revised SRP Ch. 3.9.8, ML031190634

Attachment 3: Red-line strike-out version of revised RG 1.178, ML031780764

Attachment 4: Red-line strike-out version of revised SRP Ch.3.9.8, ML031780725

Attachment 5: List of changes in RG and SRP, ML031190624

Attachment 6: ACRS Letter, ML031540348

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