

NOTATION VOTE

RESPONSE SHEET

RELEASED TO THE PDR

2/4/93

date

CL

initials

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION

FROM: COMMISSIONER CURTISS

SUBJECT: SECY-92-337 - RESPONSE TO RECOMMENDATIONS OF
THE MATERIALS REGULATORY REVIEW TASK FORCE

APPROVED ^X with comment ~~DISAPPROVED~~ ^X with comment ~~ABSTAIN~~ _____

NOT PARTICIPATING _____

REQUEST DISCUSSION _____

COMMENTS:

See attached comments

050016

James R. Luteri
SIGNATURE

RELEASE VOTE / X /

December 11, 1992

DATE

WITHHOLD VOTE / /

ENTERED ON "AS" YES X NO _____

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PDR COMMS NRCC
CORRESPONDENCE PDR

DF02

Commissioner Curtiss' comments on SECY-92-337:

I generally agree with the remarks of Chairman Selin. In particular, I, too, am concerned with the emphasis being placed on conducting team assessments, prior to our having a clearly defined regulatory basis for the assessments that the staff proposes to undertake. In the three most recent Operational Safety Assessments (OSAs), for example, the OSAs note: "For those areas identified in the report summary as 'program weaknesses,' we recognize that explicit regulatory requirements pertaining to each item may not currently exist." The reports then go on to ask the licensee to identify the steps that the licensee intends to take to address the weaknesses and to submit a schedule for completing the licensee's corrective actions. I am uncomfortable with such an approach.

To address this situation, I would recommend that earlier and more aggressive attention be devoted to developing the regulatory basis for the agency's activities in this area than what is proposed in SECY-92-337. In the interim, and in lieu of the team assessments that the staff is proposing to undertake, I believe we should place greater emphasis on conducting licensee workshops on a more frequent basis and with a narrower focus on specific topics. To take one example, we need to develop a clearer understanding as to what an integrated safety analysis should include. Once the staff has formulated some initial guidance on this subject, this might be an appropriate topic for discussion at a workshop dedicated to the topic of integrated safety analyses.

Finally, I would recommend that the staff brief the Commission on the status of its activities in this area on an annual basis, beginning with a Commission briefing in the March timeframe, as suggested by the staff.