

APR 29 1974

J. F. O'Leary
D. F. Knuth
L. R. Rogers

SUMMARY OF REGULATORY REQUIREMENTS REVIEW COMMITTEE MEETING NO. 1

A summary of the first meeting of the Regulatory Requirements Review Committee is enclosed. - Similar summaries of future meetings of the RRRC will be distributed to you by the Chairman of the Committee. Any disagreements or problems you may have with any of the Committee recommendations discussed in these summaries should be brought to my attention.

(signed) L. Manning Muntzing

L. Manning Muntzing
Director of Regulation

Enclosure:
As stated

cc: L. V. Gossick
S. H. Hanauer
H. K. Shapar
A. Gianbusso
J. M. Hendrie
R. B. Minogue
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L. Manning Muntzing
Director of Regulation

SUMMARY OF REGULATORY REQUIREMENTS REVIEW COMMITTEE MEETING NO. 1

The Committee discussed administrative and procedural matters relating to Committee business, administrative instructions to participating directorates, and the general content and technical detail of Committee review.

The Committee noted:

1. A summary of the major conclusions and decisions of each meeting of the Committee would be prepared, of which this is the first.
2. Attendance at Committee meetings by other than members will generally be limited to those invited by Committee members for the purpose of providing comments on the specific issues under consideration, or by invitation of the chairman.
3. Drafts of Standard Review Plans are under organizational review within the Licensing Directorate. As these reviews progress, it is expected that any significant differences concerning requirements or interpretations that cannot be resolved will be referred to the Committee.

The Committee recommended approval of:

1. Working Paper: "Recommended changes to Regulatory Guide 1.31, Revision 1, 'Control of Stainless Steel Welding'" transmitted to the RRRC on March 25, 1974. Immediate implementation of this guide is planned. Due to the nature of the proposed changes in procedures of the revised guide, no backfit or forefit provisions are needed.
2. Draft: "Regulatory Guide 1.7, 'Control of Combustible Gas Concentrations in Containment Following a Loss-of-Coolant Accident (Revised)'" transmitted to the RRRC on March 29, 1974. The implementation section of this guide is necessarily somewhat complicated, and is illustrative of the detail required to provide schedules for backfitting and forefitting of guides

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such as this that are related to other Regulatory requirements that have implementation schedules of their own. This guide is considered to be of sufficient importance that the Commission should be informed when it is issued.

Original signed by:
Edson G. Case, Chairman
Regulatory Requirements Review Committee

cc: J. F. O'Leary
L. Rogers
D. F. Knuth
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L. Manning Huntzinger
Director of Regulation

SUMMARY OF REGULATORY REQUIREMENTS REVIEW COMMITTEE NO. 2

The Committee noted:

1. All guides referred to the RRRC should have a separate section that clearly states the implementation schedules and effective dates.
2. In general, the Committee recommendations will address the broader principles and substance of the issues involved in matters it considers without reference to the specific language or format of the documents reviewed.

The Committee reviewed Regulatory Guide 1.XX, "Inservice Inspection of Steam Generator Tubes" transmitted to the RRRC on April 4, 1974, and recommended the following:

- a. an implementation section be developed to provide forfit and backfit provisions.
- b. the guide should include acceptable language for Technical Specifications needed to implement its provisions.
- c. for the provisions under "Baseline Inspections," a definition of the term "new plants" should be added.
- d. further study is needed of the question of when the initial inservice inspection of operating plants should be conducted.
- e. the inservice inspection requirements should provide for some minimum time span between routine inspections.

Original signed by
E. G. Case

Edson G. Case, Chairman
Regulatory Requirements Review Committee

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L. Rogers A. Giambusso
D. F. Knuth J. M. Hendrie
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MAY 24 1974

L. Manning Huntzinger
Director of Regulation

SUMMARY OF REGULATORY REQUIREMENTS REVIEW COMMITTEE MEETING NO. 3,
May 10, 1974

1. The Committee noted that various alternative courses of action can be taken regarding the new type of staff questions on valve operability and reliability that were presented to the Committee for consideration. After identification of and an exchange of Committee views on these alternative courses of action, the matter, as requested, was referred back to the staff for further consideration.
2. The Committee reviewed proposed amendments to 10 CFR Parts 50 and 115, Codes and Standards for Nuclear Power Plants, referred to the Committee on May 3, 1974, and recommended approval subject to the following:
 - a. The limiting dates of the applicable codes or addenda should be revised to 18 months prior to docket date for pressure vessels, 12 months prior to docket date for pumps and valves, and 6 months prior to docket date for piping.
 - b. The statement of consideration should include a statement to the effect that the AEC, in considering whether future changes to Section XI should be adopted in whole or in part by the Commission, will take into account the fact that existing plants are subject to any new inspection techniques required by such changes to Section XI.

Original signed by
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Edson G. Case
Deputy Director of Licensing

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JUN 28 1974

L. Manning Muntzing
Director of Regulation

SUMMARY OF REGULATORY REQUIREMENTS REVIEW COMMITTEE MEETING NO. 4,
MAY 24, 1974

1. The Committee discussed the backfit considerations of existing regulatory guides. A preliminary assessment of the applicability of each existing Guide to operating facilities has been made by the Deputy Director for Reactor Projects to serve as the basis for the discussions. The Committee noted that the several directorates may have particular interests and viewpoints regarding approach, priorities and schedules, not necessarily consistent with the preliminary assessment, and referred the matter back to the staff to develop, for consideration by the Committee, a comprehensive program and approach leading to the resolution of this matter.
2. The Committee reviewed proposed revisions to Regulatory Guide 1.3, Assumptions Used for Evaluating the Potential Radiological Consequences of a Loss of Coolant Accident for Boiling Water Reactors and 1.4, Assumptions Used for Evaluating the Potential Radiological Consequences of a Loss of Coolant Accident for Pressurized Water Reactors, and recommended approval subject to the following:
 - a. A brief statement in the Introduction of each guide that summarizes the nature and significance of the change.
 - b. A statement that the guides are effective immediately.

Original signed by
E. G. Case

Edson G. Case
Chairman, Regulatory Requirements
Review Committee

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JUN 28 1974

L. Manning Muntzing
Director of Regulation

SUMMARY OF REGULATORY REQUIREMENTS REVIEW COMMITTEE MEETING NO. 5,
JUNE 14, 1974

1. The Committee reviewed proposed Regulatory Guide 1.XX, CONSTRUCTION CRITERIA FOR CLASS 1 COMPONENTS IN ELEVATED TEMPERATURE REACTORS, and recommended approval subject to the following:
 - a. An effective date of January 1975 be used, unless it can be determined that the proposed effective date of July 1, 1974 provides reasonable warning time for industry use.
2. The Committee reviewed the proposed revisions to General Design Criteria 17 and recommended approval with an effective date six months after publication date.
3. The Committee completed its review of Regulatory Guide 1.XX, INSERVICE INSPECTION OF PWR STEAM GENERATOR TUBES, (See Summary of RRRC Meeting No. 3, April 19, 1974) and recommended approval subject to the following:
 - a. The effective date of the guide be September 1, 1974 rather than the proposed July 1, 1974.
 - b. Reporting required in paragraphs c.7.6 and c.9 of the guide be within 120 days of the effective date of the guide rather than the proposed 90 days.
 - c. In paragraph D.4.(a), the proposed 90-day period be extended to a 120-day period.
 - d. Language should be included to assure that Technical Specifications require not only the reporting but the conduct of the testing in a timely fashion.

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- e. Certain changes in wording and definitions be resolved in mutually agreeable fashion between Regulatory Standards and Reactor Projects.

Original signed
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Deputy Director of Licensing

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L. Manning Muntzing
Director of Regulation

SUMMARY OF REGULATORY REQUIREMENTS REVIEW COMMITTEE MEETING NO. 7,
JULY 3, 1974

1. The Committee discussed the matters described in the Working Paper: SEISMIC DESIGN BASES FOR CURRENT CP APPLICATIONS and had the following comments:
 - a. Staff positions and evaluations should take into account the recent work by the U. S. Geologic Survey in mapping of seismic provinces for eastern areas of the continental U. S.
 - b. The seismic structural design bases for plants should include consideration of soil amplification or damping properties.
 - c. Reconsideration of the 10 CFR Part 100 Appendix A requirement of 1/2 SSE as the minimum operational basis earthquake is appropriate in view of recent changes in structure and equipment damping factors for the SSE and OBE.
 - d. The preliminary site suitability examinations in advance of CP applications planned to be conducted by the staff should help in alerting prospective applicants and the Regulatory staff to potential seismic and other site-related problems.
 - e. For the individual applications involved, additional discussions with the applicants are recommended in further attempts to achieve mutual agreement on the seismic design criteria for structures, systems and components important to safety.
2. The Committee reviewed the Working Paper: Draft Regulation Guide 1.XX, DESIGN GUIDANCE FOR RADIOACTIVE WASTE MANAGEMENT SYSTEMS INSTALLED IN LIGHT-WATER-COOLED NUCLEAR POWER REACTOR PLANTS and recommended approval subject to the following comments:
 - a. Many of the provisions of this proposed guide have been previously discussed with appropriate industrial code committees. Although some resistance has been encountered in incorporating these requirements into the industrial

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L. Manning Muntzing

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codes, additional efforts by the Regulatory staff to this end are still underway and should be continued. For some reasonable period of time, the proposed guide should not be issued but established as a Branch position for those applications immediately affected, from which the individual applicants may appeal through the normal appeal process.


- b. The draft guide should incorporate the minor suggestions made by the Committee and if there is no substantial progress by the industrial code committees, it should be issued for immediate implementation.

Original Signed By
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Edson G. Case
Chairman, Regulatory Requirements
Review Committee

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Director of Regulation

SUMMARY OF REGULATORY REQUIREMENTS REVIEW COMMITTEE MEETING NO. 8,
JULY 23, 1974

1. The Committee reviewed the letter from John E. Ward, Chairman, AIF Committee on Reactor Licensing and Safety, concerning establishment of a period for public comment on new or revised regulatory guides and related matters. The Committee noted that:
 - a. The recommendations in the letter that a policy statement be issued delineating the procedures to be followed would be satisfied by the June 12 Federal Register Notice in combination with the AEC letter reply to Mr. Ward (to be placed in the Public Document Room).
 - b. The suggestion in the letter that more than 60 days be allowed for comments was not acceptable.
 - c. The judgement as to whether a "draft" regulatory guide should be immediately implemented must remain with the Regulatory staff and not be constrained by a requirement for industry review prior to implementation.

Those guides calling for immediate implementation are those reflecting a significant safety problem or those codifying current practice. The latter types of guides included consideration of industry input, as such practice evolved in the licensing of individual plants. In any event, the R³C reviews the implementation schedules for all guides, including those calling for immediate implementation, to determine need and justification.

2. The Committee reviewed the proposed Regulatory position on the qualification of NDT technicians and recommended approval with the following comments:
 - a. This position is not in fact a ratchet, but rather a clarification of intent regarding a previously-established requirement.

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- b. No backfitting, i.e., repeating of tests already performed by Level I technicians, is intended.
 - c. The proposed 30 day implementation period is acceptable.
3. The Committee reviewed the "Proposed Regulatory Guide on Tornado Missiles" and returned it to the staff for further development with the following comments:
- a. The proposed guide should be separated into two separate guides, one on applicable type of missiles and related velocities, and another on the systems to be protected from tornado missiles.
 - b. While needed aerodynamic studies concerning tornado missiles and their maximum velocities are underway, the proposed missiles and velocities should be clearly labeled as an interim guide pending the outcome of such studies (similar to the fence-post cow guide). The Committee urges the expeditious conclusion of these studies.
 - c. Both guides should be returned for further Committee review.

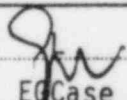
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Director of Regulation

SUMMARY OF REGULATORY REQUIREMENTS REVIEW COMMITTEE MEETING NO. 9,
AUGUST 12, 1974

1. The Committee reviewed the Proposed Amendments to 10 CFR Parts 50 and 73 to Specify Measures for Physical Protection of Nuclear Power Reactors from Industrial Sabotage and recommended approval subject to the following comments:
 - a. The additional measures required would not involve a great deal of effort and expense as compared to the increase in protection provided. However, the increasing emphasis in the safeguards area can have a far-reaching impact on the design of systems, structures, and components and, in some instances, be counter-productive to safety. The consequences of such actions must be carefully considered in terms of the net benefits to public health and safety derived.
 - b. Proposed General Design Criterion 6 should not be included until specific design requirements can be detailed.
 - c. Additional emphasis will eventually be required on the problems of internal sabotage.
2. The Committee reviewed the proposed position on Auxiliary Feedwater Pump Drives and recommended the following:
 - a. A Branch position should be established to the effect that complete reliance on any one source of energy for the auxiliary feedwater systems is not acceptable. This includes not only the pump drives but whatever other powered components are required for the operation of the systems. An example of acceptable auxiliary feedwater systems would be one relying on DC and steam plus one relying only on AC, either one of which can provide the required flow.

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- b. This position should be imposed on all applications for which the staff safety evaluation is not yet completed, and for all subsequent applications.
- c. Regulatory Standards should investigate the backfit problem, and initiate work on a Regulatory guide.

Original Signed By
E. G. Case

Edson G. Case
Chairman, Regulatory Requirements
Review Committee

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Director of Regulation

SUMMARY OF REGULATORY REQUIREMENTS REVIEW COMMITTEE MEETING NO. 10,
AUGUST 22, 1974

1. The Committee reviewed Working Paper: PROPOSED REVISION 2 TO REGULATORY GUIDE 1.16, REPORTING OF OPERATING INFORMATION, and recommended approval subject to the following condition:

- a. Section C.1.b.(3)(a) should be deleted and the information sought therein obtained by any one of several proposed alternative means that were discussed;

and with the following comments:

- a. The separate guide now in preparation that lists all the reports required by existing Regulations should be made available as soon as possible after revised Regulatory Guide 1.16 is issued.
- b. Since it is expected that the Technical Specification requirements for various reports will become stabilized in the near future, Regulatory Standards should codify all reporting requirements in a regulation as soon as practicable.
- c. Minor rewording of the implementation section should be made in accordance with the comments of the Committee.

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2. The Committee discussed the Working Paper: BACKFIT CONSIDERATIONS OF REGULATORY GUIDES and agreed with the procedure proposed except that the working group should report to the Deputy Director for Reactor Projects instead of the RRRC Chairman. The matter was referred back to the staff for implementation.

Original Signed By
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Edson G. Case
Chairman, Regulatory Requirements
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Director of Regulation

SUMMARY OF REGULATORY REQUIREMENTS REVIEW COMMITTEE MEETING NO. 11,
SEPTEMBER 12, 1974

The Committee reviewed the draft REVISED TECHNICAL SPECIFICATIONS FOR PRIMARY AND SECONDARY COOLANT ACTIVITY, and recommended approval with the following comments:

- a. The Standard Review Plan covering this area should contain appropriate language to indicate that for unusual sites or particular circumstances, the staff will consider alternative coolant activity specifications if proposed and justified by applicants and/or licensees. It is expected that such alternative specifications proposals will be relatively few.
- b. The bases for these specifications should indicate that since iodine spiking is a normal phenomena of reactor operations, its consideration in the accident analyses is not establishing a precedent for compounding accident analyses with plant transients.

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