

NOTATION VOTE

RESPONSE SHEET

TO: John C. Hoyle, Secretary

FROM: CHAIRMAN JACKSON

SUBJECT: SECY-96-218 - QUARTERLY STATUS UPDATE FOR
THE PROBABILISTIC RISK ASSESSMENT (PRA)
IMPLEMENTATION PLAN, INCLUDING A DISCUSSION
OF FOUR EMERGING POLICY ISSUES ASSOCIATED
WITH RISK-INFORMED PERFORMANCE-BASED
REGULATION

Approved XX w/comments Disapproved _____ Abstain _____

Not Participating _____ Request Discussion _____

COMMENTS:

John C. Hoyle
SIGNATURE

Release Vote / X /

November 5, 1996

DATE

Withhold Vote / /

Entered on "AS" Yes X No _____

CHAIRMAN JACKSON'S COMMENTS ON SECY-96-218

A. The Role of Performance-Based Regulation in The PRA Implementation Plan

I approve the staff's recommendation in alternative 1 but believe that applications of performance-based approaches should not be limited to risk-informed initiatives. Performance-based initiatives that do not explicitly reference criterion derived from PRA insights should not be excluded from consideration.

Performance monitoring may either require the development of appropriate statistics to determine if some criterion is met or explicit relationships between degraded equipment states and equipment failure. The staff should provide the Commission a summary discussion on how these issues are being addressed in planned performance-based approaches.

The staff should address the technical questions concerning the implementation and monitoring aspects of performance based regulations (Attachment 3, Item IV to SECY-96-218), and how they will be addressed within the context of the Maintenance Rule. In addition, the staff should specifically address how PRA results will be used in the inspection process and inspection program. These items should be discussed in the March 1997 quarterly update and in the next Commission briefing on the PRA implementation plan.

B. Plant-Specific Application of Safety Goals

I approve the staff's recommendation of alternative 1 and concur with Commissioner Rogers' recommendation regarding the use of numerical guidelines for plant-specific regulatory decisions.

C. Risk Neutral Vs. Increases in Risk

The adequacy of using mean values to compare with numerical criteria is not always clear. There can be large uncertainties associated with risk calculations. These uncertainties can be so large that they can render as almost meaningless the comparison of a single number with some criterion. Therefore, I approve alternative 1 provided the staff can provide a sound rationale for judging small increases. There is a need for explicit consideration of uncertainties. In addition, I agree with Commissioner Rogers' comments.

D. Implementation of Changes to Risk-Informed IST and ISI Requirements

I approve the staff's recommendation of alternative 2 and concur with Commissioner Rogers' comment.