

N O T A T I O N   V O T E

RESPONSE SHEET

TO: John C. Hoyle, Secretary

FROM: COMMISSIONER DIAZ

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

Approved WSD Disapproved \_\_\_\_\_ Abstain \_\_\_\_\_

Not Participating \_\_\_\_\_ Request Discussion \_\_\_\_\_

COMMENTS: see comments, ref t

his [signature]  
SIGNATURE

Release Vote /✓/

10-23-96  
DATE

Withhold Vote / /

Entered on "AS" Yes ✓ No \_\_\_\_\_

Comments on SECY-96-218

I approve the staff's recommendations on the four policy issues with the following comments:

On page 2 of Attachment 2 to SECY-96-218, the staff concluded that "...a risk-informed, performance-based regulatory approach should have at least four key elements:..." The fourth element is "...failure to meet a performance criterion will not have an intolerable outcome." Since the words "intolerable outcome" are subjective, I would like the staff to offer a modification/clarification to rephrase this key element. For example,

"failure to meet a performance criterion will not result in violation of a Safety Limit"

or

"failure to meet a performance criterion will not result in failure to meet the NRC's Safety Goal Quantitative Health Objectives."