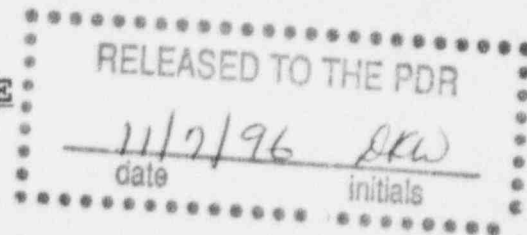


NOTATION VOTE

RESPONSE SHEET



TO: John C. Hoyle, Secretary

FROM: CHAIRMAN JACKSON

SUBJECT: SECY-96-134 - OPTIONS FOR PURSUING  
REGULATORY IMPROVEMENT IN FIRE PROTECTION  
REGULATIONS FOR NUCLEAR POWER PLANTS

Approved   X   Disapproved        Abstain       

Not Participating        Request Discussion       

COMMENTS:

Subject to comments attached.

*Shirley Ann Jackson*  
SIGNATURE

Release Vote /   X   /

September 9, 1996

DATE

Withhold Vote /        /

Entered on "AS" Yes   X   No       

*DFC 2 1/1*

080025

#### CHAIRMAN'S COMMENTS ON SECY 96-134

I approve Option 2, Revis<sup>ed</sup> 10 CFR 50.48 and modify, or remove, App. R. This option removes the inherent inconsistency, set up by the promulgation of App. R, whereby licensees have different regulatory approaches in maintaining their fire protection programs. This option creates consistency, eliminates future exemptions, enhances flexibility, and allows latitude for future efforts concentrating on risk significant activities.

In the area of fire protection regulation, the staff should develop a plan (including milestones and schedules) for transitioning to a more risk-informed and performance-based regulatory structure. The plan should identify the key elements of a transition strategy as well as the obstacles that must be overcome to make progress in this area. Weaknesses in PRA methods and operational data should be identified along with ongoing research activities to address the weaknesses identified (if any). Since "uncertainty" is likely to be a major issue in any risk-informed and performance-based approach, the staff should explicitly address plans for dealing with this issue. Additionally, I encourage continued staff interaction with industry regarding the transition toward risk-informed performance-based regulation.

Further, the staff should factor preliminary IPEEE insights-gained into rulemaking in this area. Finally, the staff should address the legal status of the existing exemptions granted to licensees should new rulemaking be adopted.