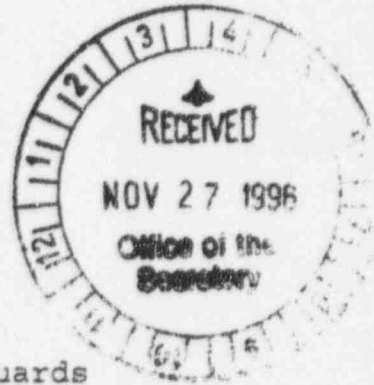




UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

DSI-13
(13)

November 27, 1996



MEMORANDUM TO: John C. Hoyle, Secretary
Office of the Secretary

FROM: John T. Larkins, Executive Director
Advisory Committee on Reactor Safeguards

SUBJECT: COMMENTS BY INDIVIDUAL ACRS MEMBERS REGARDING
DIRECTION SETTING ISSUES

Attached for your consideration are comments by Drs. Dana Powers and Donald Miller, and Mr. John Barton, ACRS Members, regarding Direction Setting Issues # 2 (Oversight of the Department of Energy), # 13 (Role of Industry), and # 11 (Operating Reactor Program Oversight), respectively. These comments represent the views of the individuals mentioned above and do not necessarily represent those of the ACRS full Committee.

Attachment: As stated

cc: ACRS Members
J. M. Taylor, EDO
J. Milhoan, EDO
J. Craig, RES

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COMMENTS BY
ACRS MEMBER DON MILLER

ON

STRATEGIC ASSESSMENT ISSUE PAPER DSI-13
ROLE OF INDUSTRY

Option 4: NRC regulatory guidance, primarily promulgated through Regulatory Guides, extensively uses consensus industrial standards as a basis. Typically this is accomplished through endorsement of these standards, with appropriate exceptions. In many cases, these standards have been developed with a primary objective of serving as a basis for Regulatory Guides and have also benefited from participation by NRC staff.

In the past several years, guidelines have been developed by industrial groups with leadership provided by industrial organizations (or its predecessors) such as the Electric Power Research Institute (EPRI) and the Nuclear Energy Institute (NEI). This approach has been used to address specific regulatory issues, the industry believed more definitive guidance was required. These guidelines often have been developed with input from NRC staff. They, unlike consensus standards, have not used the consensus process.

Guidelines also have not been developed with the objective of endorsement by the NRC as a Regulatory Guide, although on several occasions guidelines have been endorsed through a safety evaluation report (SER). The development of guidelines has been a valuable contribution to improving the regulatory process.

The NRC should continue to increase its encouragement of industrial participation in standards, codes and guidelines. With the "downsizing" of plant staff's and NRC, the NRC should establish a high priority on Option 4. This option has an established record of providing significant contribution to the regulatory process. Option 6 should be selected at a minimum to maintain the current level of contribution.

Although it is recommended that priority be placed on Option 4, there are many opportunities for expansion of the industry role in regulatory oversight. For example, industry has taken an expanded role in operator license examination. For example, publication of plant-specific performance indicator device would be an appropriate area for involvement by industry.