RES STAFF

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Reference
1192

DEC 3 1987

PDR: per R. EMRIT

MEMORANDUM FOR: R. Fraley, ACRS
T. Murley, NRR
E. Jordan, AEOD
H. Thompson, NMSS
S. Ebneter, OSP
W. Russell, Reg. I
J. N. Grace, Reg. II
A. Bert Davis, Reg. III
R. D. Martin, Reg. IV
J. B. Martin, Reg. V

FROM: Eric S. Beckjord, Director
Office of Nuclear Regulatory Research

SUBJECT: RES OFFICE LETTER NO. 1, "PROCEDURE FOR IDENTIFICATION, PRIORITIZATION, AND TRACKING OF THE RESOLUTION OF GENERIC ISSUES"

As a result of the NRC reorganization in April 1987, the functional responsibility for the early stages of generic issue management is now in the Office of Nuclear Regulatory Research (RES). Therefore, the enclosed procedure has been developed to replace the guidance previously provided by NRR Office Letter No. 40.

The generic issue process consists of six phases: Identification, Prioritization, Resolution, Imposition, Implementation, and Verification. The enclosure to this letter specifies the procedure to be followed for the management of generic issues through the first two stages (Identification and Prioritization) as well as the tracking of those issues through their resolution. The procedures for managing generic issues through the Resolution, Imposition, Implementation, and Verification stages will be provided separately. This procedure was developed to provide a mechanism to document new safety concerns with existing and future reactors and to have the RES staff formally evaluate these concerns for safety significance and appropriate action. Since potential generic issues may arise from different offices within Headquarters or from sources outside of the Headquarters staff such as the ACRS, Regional Offices, or the public and since the prioritization of these issues may involve review by other Offices, this procedure is being provided outside RES for information and use, as appropriate. RES intends to accept potential generic issues for evaluation from any source provided they generally follow the attached procedure and provide adequate information regarding the concern (as prescribed in Attachment 1 to the Procedure) to allow RES to make an assessment of their priority.

DF/3

Add: R. EMRIT, RES

CF Subj Res

DEC 3 1987

This procedure is not intended to be applied to screen all current or future work going on within NRC (which may be initiated through various mechanisms) but should be used for new potential generic issues associated with nuclear power plants.

Eric S. Beckjord, Director
Office of Nuclear Regulatory Research

Enclosure:
Procedure for Identification,
Prioritization and Tracking of
the Resolution of Generic Issues

cc: V. Stello, EDO
All RES Employees

ENCLOSURE

PROCEDURE FOR IDENTIFICATION, PRIORITIZATION AND TRACKING OF THE RESOLUTION OF GENERIC ISSUES

INTRODUCTION:

A generic issue is an issue that is applicable to all, several or a class of reactors or reactor related facilities. Generic issues can arise from various concerns and, accordingly, are classified into one of the following four categories. A Generic Safety Issue (GSI) is a generic issue that involves a safety concern that may affect the design, construction, operation or decommissioning of all, several or a class of reactors or facilities and may have a potential to require licensees to make safety improvements and/or require the promulgation of new or revised requirements or guidance. A Regulatory Impact Issue (RI) is a generic issue not related to improving safety, but to modifying current NRC requirements or guidance, with the primary purpose of reducing the regulatory impact, usually cost, of requirements on licensees or applicants. An Environmental Issue (EI) is a generic issue involving impacts on those items protected by the National Environmental Policy Act (NEPA). A Licensing Issue (LI) is a generic issue related to actions the NRC staff should take to increase knowledge, certainty, and/or understanding in order to increase confidence in assessing levels of safety; improve or maintain the NRC capability to make independent assessments of safety; establish, revise, and carry out programs to identify and resolve safety issues; document, clarify, or correct current requirements and guidance; or improve the effectiveness or efficiency of the review of applications.

The generic issue management program is divided into six distinct stages; identification, prioritization, resolution, imposition, implementation and verification. The procedure described herein is to be utilized only for the identification and prioritization stages of generic issue management, including their tracking through resolution. Procedures for the management of generic issues during resolution, imposition, implementation and verification are not covered by this procedure.

In the identification stage, potential generic issues may be suggested by organizations or individuals within the NRC, the Advisory Committee on Reactor Safeguards (ACRS), the nuclear power industry, or the public. Generic issues may also be suggested as an outcome of reactor research programs. Potential risk to the public is the principal consideration in suggesting a potential generic issue. Once suggested, potential generic issues are screened for duplication, overlap, or integration with existing generic issues. When a potential generic issue is accepted as a new generic issue, it is assigned a number and title, the scope of the issue is defined, classified by type (GSI, RI, EI or LI), and cataloged with all other generic issues in NUREG-0933, "A Prioritization of Generic Issues."

Each new GSI is then prioritized by developing a quantitative assessment of safety benefits (risk reduction) and NRC and utility impact (cost) as described in NUREG-0933. Based on the extent of potential risk reduction to the public and value/impact ratio developed from this assessment, and as further adjusted by qualitative judgments, a priority is assigned to each GSI. RIs, LIs, and EIs are evaluated and quantitative and qualitative estimates of their merits are described. The preliminary priority assessments for each issue are sent for peer review and comment. These peer review comments are then addressed, the original preliminary assessment revised, as necessary, and a final priority recommended, as appropriate.

Issues which are assigned a HIGH or MEDIUM priority move on to the resolution stage. All HIGH priority generic safety issues are screened for additional designation as an Unresolved Safety Issue (USI). An issue assigned a LOW or DROP priority by nature of the rating standard is of so low a public risk reduction potential that resolution of the issue is not pursued. All issues are documented in the catalog of generic issues maintained in NUREG-0933. Generic issues not initially assigned staff resources for resolution (LOW or DROP) may be reactivated in the future if new information becomes available which may change the original priority assignment or change their classification. NUREG-0933 serves as the repository for the priority assignment and resolution for all identified generic issues. NUREG-0933 is updated semiannually.

RIs, LIs, EIs and HIGH and MEDIUM priority GSIs are assigned by the Office Director, Office of Nuclear Regulatory Research (RES) to the appropriate NRC Office fc resolution. Most GSIs are usually resolved within RES; however, from time to time other offices are assigned GSIs for resolution. RI, LI and EI's are assigned to NRR for disposition. In the resolution stage, an in-depth technical evaluation of the issue is performed by the office assigned the task of resolution.

The status of issue prioritization and resolution is tracked in the Safety Issues Management System (SIMS). For each issue, the SIMS includes a synopsis of the issue, work scope, work status, and program milestones.

PROCEDURE:

1. IDENTIFICATION:

   a. Anyone inside or outside NRC can identify a proposed generic issue. A generi .ssue may be proposed by an individual or by an organizational unit. However, when proposed, an attempt should be made to include all the information specified in Attachment 1 so that there is a clear understanding of the issue and its safety significance. Submittals that do not contain sufficient information may be returned to the originator to provide additional information.

   b. Proposed generic issues should be submitted to NRC's Office of Nuclear Regulatory Research (RES) and addressed to the Director, RES.

   c. RES/ARGIB will screen all proposed generic issues for duplication or overlap with previously identified generic issues and to see if, in fact, they are generic, not plant specific issues. Proposed issues that may be plant specific will be sent to NRR for review and appropriate action.

   d. For each generic issue accepted, RES/ARGIB will assign it a number and will maintain a log of its status and disposition. RES/ARGIB

will promptly advise the originator of the receipt and initial disposition of the issue. This disposition may include a determination that the issue is covered by another existing issue or Multi-Plant Action (MPA), that it has been accepted for prioritization, or that additional information is needed.

e. After their acceptance, generic issues that originate from outside NRR or from an individual within NRR (i.e., not sent through NRR management) will be transmitted by RES to NRR/ILRB for an immediate action determination and screening for identification of overlap or duplication with already imposed or completed Multi-Plant Actions (MPAs). If NRR can not complete the immediate action determination and MPA screening within 15 working days, RES should be informed when the NRR review will be completed.

2. PRIORITIZATION:

a. RES/ARGIB will classify each accepted generic issue as a GSI, RI, LI or EI. Based upon its classification, one of the following actions will be taken:

1. Issues classified as RIs, LIs, and EIs will be evaluated and their merits quantitatively and qualitatively estimated and described in a preliminary assessment report.

2. Issues classified as GSIs will be evaluated by RES/ARGIB and assigned a preliminary priority estimate based on engineering judgment and/or very rough quantitative risk calculations. These preliminary priority estimates (i.e., safety significance) will be used by ARGIB to establish an order for entering GSIs into the prioritization process; i.e, those with preliminary priority estimates of HIGH will be entered into the process before GSIs with preliminary priority estimates of MEDIUM, LOW and DROP, MEDIUM before LOW and DROP, and LOW before DROP.

b. ARGIB will prepare a draft prioritization write-up for each generic issue using the methodology described in NUREG-0933. GSIs will be assigned a proposed priority ranking of HIGH, MEDIUM, LOW or DROP based on their estimated public risk reduction potential, their value/impact ratio, and other considerations.

c. RES/ARGIB will send the draft prioritization write-up of each generic issue to appropriate NRC personnel for peer review prior to finalizing their priority. Those involved in peer review will include the cognizant RES division director(s), NRR/ILRB (for distribution to cognizant NRR management and staff) and the originator. Those providing peer review are to provide comments on the draft prioritization and the priority ranking to RES/ARGIB within 15 work days of receipt. In some instances, for GSIs which receive a low or drop preliminary priority estimate, ARGIB may enter into discussions with the originator of these issues to finalize the issue prioritization through direct interaction with and by agreement of the originator. Issues so handled would be documented in NUREG-0933 to clearly note that the priority assignment was achieved without the benefit of peer review.

d. Based upon the results of the peer review, RES/ARGIB will revise the draft prioritization to address the comments or identify the differences, include a recommended final priority ranking, as appropriate, and submit it to the Director, RES, for approval.

e. For GSIs approved as HIGH or MEDIUM priority the Director, RES, will assign them to the appropriate RES Division or other NRC Office for resolution. For issues approved as RIs, LIs and EIs the Director, RES, will send the final assessments to NRR for disposition, as appropriate. In addition, the Director, RES, will send the prioritization assessments of all approved generic issues to other Offices, the ACRS and the Public Document Room for information and comment.

f. RES/ARGIB will annually request those assigned the resolution of GSIs prioritized as HIGH to provide a recommendation to the Director, RES, as to whether they should be designated as candidate Unresolved Safety Issues. Criteria to be used are documented in NUREG-0705.

g. RES/ARGIB will annually request NRR, AEOD, and RES divisions to assess all issues assigned a priority ranking of LOW or DROP to determine if their priority should be reevaluated based on new information.

3. TRACKING

a. Each NRC Office assigned the task of resolving one or more generic issues should prepare and implement a plan defining the responsibilities, process, and schedule for resolution. The Office Director for the cognizant NRC branch assigned the task of resolution of a newly approved issue will submit a copy of the work plan, including a detailed schedule and the plan for the regulatory analysis, to the Director, RES, within 6 weeks of being assigned the issue. This submittal shall contain the information listed in Attachment 2.

b. The Chief of the cognizant NRC branch will submit status reports for each approved work plan to the Chief, RES/ARGIB, quarterly or as requested. When a status report indicates slippage of the estimated resolution completion date, the revised work plan must be approved by the cognizant Office Director and by the Director, RES.

c. RES/ARGIB will provide the approved work plans for all generic issues as input to SIMS. RES/ARGIB will provide updates to SIMS quarterly to incorporate approved work plans for new generic issues and incorporate modifications to and/or changes in schedular information for existing work plans.

d. RES/ARGIB will issue a quarterly status summary of Generic Issue resolution progress through the Generic Issue Management Control

System (GIMCS). Quarterly reports will also be provided by the Director RES to the EDO highlighting progress, problem areas and schedule changes.

e. RES/ARGIB will update NUREG-0933 semiannually to catalog new generic issues, document the progress of staff efforts during the prioritization process, and document the priority assignments made for generic safety issues.

Attachment 1

GENERIC ISSUE INFORMATION

The following information should be provided in sufficient detail to permit the ARGIF to initiate technical analysis and prioritization of the proposed issue with a minimum of additional information gathering.

1. A title for the proposed generic issue should be suggested. While brief, the suggested title should attempt to define the specific nature and scope of the proposed issue.

2. Potential, suggested, or known deficiencies in the technical bases of existing staff guides or requirements should be identified (i.e., Regulatory Guides, Standard Review Plan Sections, Rule, etc.). For proposed issues suggested by examination of LERs, a complete listing of applicable LERs and/or a complete set of copies of the applicable LERs should be provided.

3. A description of the proposed issue should be provided which discusses the background (bases) and perceived safety significance of the issue (i.e., contribution to risk, core melt frequency or public dose). The issue should be scoped to identify those individual plants or classes of plants affected by the proposed issue.

4. Sufficient attention should be devoted to the proposed issue to suggest a potential solution and/or alternative solution (i.e., design and hardware changes and/or additions; procedural changes; changes in plant staffing and/or management; accident management changes, etc.).

5. The suggested solution and/or alternative solutions should be evaluated in sufficient detail to determine whether the solution(s) would be expected to result in:

a) the need for additional research, staff studies, testing, new procedures, rulemaking, etc.;

b) increase or decrease in operational exposure of the plant operating staff; and

c) a plant shutdown or extension of a refueling outage to implement the potential solution(s) for the proposed issue.

6. A preliminary value/impact assessment should be provided for the potential solution(s) for the proposed issue. The reference documents listed below provide methodologies for both risk and cost analysis, and illustrative examples. ARGIB will advise and/or assist in the development of value/impact assessment, as requested.

7. Name(s) and organization(s) of all persons currently working on this issue should be provided.

8. The name of the person supplying preliminary value/impact assessment information should be provided.

9. Appropriate references (Memoranda, NUREGs, SRPs etc.) should be provided.

10. The transmittal memorandum should reflect the concurrence of the Office of the orginator, if possible; however, this is not mandatory.

Reference Documents

NUREG/BR-0058, Revision 1, "Regulatory Analysis Guidelines for the U. S. Nuclear Regulatory Commission," May 1984.

NUREG/CR-3568, "A Handbook for Value-Impact Assessment," December 1983.

NUREG-0933, "A Prioritization of Generic Safety Issues," December 1983.

NUREG/CR-2800, "Guidelines for Nuclear Power Plant Safety Issue Prioritization Information Development," February 1983 and Supplements 1, 2, 3, and 4.

NUREG/CR-3971, "A Handbook for Cost Estimating," October 1984.

NUREG/CR-4568, "A Handbook for Quick Cost Estimates," April 1986.

AEOD Procedure 3, "Application of Risk Perspectives: A Procedures Guide," Peter Lam, U. S. NRC, October 15, 1984.

Attachment 2

Generic Issue Management Control Information

Item Number	(Generic Issue Number)
Title	(Generic Issue Title)
Lead Office/Div/Br Other Office/Div/Br	As appropriate " " "
Task Manager	(Name)
Tac Number	(as assigned)
Work Authorization	(if different from Parts A, B, and C of Appendix F from Operating Plan)
Contract Title	Provide Contract Title (if contract issued)
Contractor Name/ FIN No.	Identify Contractor Name and FIN Number (as appropriate
Work Scope	Describe briefly the work scope for completing the issues)
Affected Documents	Issue NUREG- Revise and issue Regulatory Guide 1.xx Revise and issue SRP Section x.x.x Revise and process STS change
Technical Resolution	Select milestones from the initial date Division Director was requested for information through issuance of revised SRP change. For the most part the selected milestone dates will vary from issue to issue. Typical milestones should include but are not limited to those on the following page.
Status	Describe current status of work.
Problem/Resolution	Include potential problems and actions being taken to resolve them.

Milestone Examples	Original	Current	Actual
. Date information requested from Division			
. Date received from Division			
. Proposal Solicited			
. Proposal Evaluated and Accepted			
. Contract Schedule, if applicable			
. Testing Schedule, if applicable			
. Draft NUREG/CR report from contractor/consultant			
. Staff review of draft NUREG/CR report			
. Value Impact Statement prepared			
. Final report prepared by Division			
. Final report forwarded to RES for processing			
. RES Director Review completed			
. Review Package to CRGR			
. CRGR review completed			
. EDO approval			
. Federal Register Notice of Issuance of SRP for Public Comment			
. OMB Clearance, if applicable			
. Division review of public comment completed			
. RES Director review completed			
. CRGR review completed			
. EDO approval			
. Federal Register Notice of Issuance of SRP			