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

Reference
1192-3

NOV 26 1991

PDR; per R. EMRIT

MEMORANDUM FOR: RES Employees

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

SUBJECT: RES OFFICE LETTER NO. 1, REVISION 3, "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 was transferred to the Office of Nuclear Regulatory Research (RES). RES Office Letter No. 1 (OL-1) was published on December 3, 1987, to replace the guidance previously provided by NRR Office Letter No. 40, and Revision 1 was published on March 22, 1989. The purpose of this revision to RES OL-1 is to reflect recent changes in the generic issues prioritization procedure brought about by the recent transfer of the function from the Division of Regulatory Analysis to the Division of Safety Issue Resolution. One major change is that NRR is asked to participate in the peer review process of those prioritizations for which RES recommends a Low or Drop priority and need not concur for GSIs prioritized High or Medium. NRR will continue, however, to participate in the peer review of the final resolution packages of all suc issues.

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 stage (RES Office Letter No. 3) and the Imposition, Implementation, and Verification stages (accomplished by NRR) are 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

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Add: R. EMRIT, RES

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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.

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.

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

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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 catalogued with all other generic issues in NUREG-0933, "A Prioritization of Generic Issues."

Each new GSI is normally prioritized by developing a quantitative assessment of safety benefits (risk reduction) and NRC and utility impacts (cost) as described in NUREG-0933. Based on the extent of potential risk reduction to the public and the value/impact ratio developed from this assessment, and as

further adjusted by qualitative judgments and other considerations, 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 state. 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 catalogue 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 for resolution. Most GSIs are usually resolved within RES; however, from time to time other offices are assigned GSIs for resolution. LIs are assigned to NRR for disposition. RIs and EIs are assigned within RES, and decisions to work on the resolution of these issues are made by qualitative judgment and the availability of staff resources. 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 generic issue may be proposed by an individual or by an organization 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.

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

   c. RES/DSIR 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/DSIR will assign it a number and will maintain a log of its status and disposition. RES/DSIR 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/PMAS for an immediate action determination and screening for identification of overlap or duplication with already imposed or completed Multi-Plant Actions (MPAs). If NRR cannot complete the immediate action determination and MPA screening within 15 days, RES should be informed when the NRR review will be completed.

2 PRIORITIZATION

a. RES/DSIR 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/DSIR and assigned a preliminary priority estimate based on engineering judgment and/or very rough quantitative risk calculations. The preliminary estimate (i.e., safety significance) will be used by DSIR 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. DSIR will prepare a draft prioritization write-up for each generic issue using the methodology described in NUREG-0933. GSIs will be assigned a 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/DSIR 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 DSIR Division Director, DSIR Branch Chiefs, NRR/PMAS (for distribution to cognizant NRR management and Staff), as appropriate, and the originator. NRR will be requested to participate in the peer review process only for GSIs with a priority recommendation of Low or Drop. NRR/PMAS will be provided

information copies of the priority write-up for GSIs with a High or Medium priority recommendation and issues classified as RI, EI or LI. The offices designated for peer review for an individual issue are to provide comments on the draft prioritization and the priority ranking to RES/DSIR within 15 work days of receipt. NRR will perform a screening review of the prioritization and will perform a full staff review only if the result appears questionable. In that case, a review schedule will be developed by NRR and RES will be informed of that schedule.

d. Based upon the results of the peer review, RES/DSIR 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 for resolution or request an other NRC Office to resolve them. For issues approved as LIs, the Director, RES will send the final assessments to RES or NRR for disposition, as appropriate, based on the nature of the issue. For issues approved as RIs or EIs, the Director, RES, will assign the issues within RES based upon a decision to work the issues made by qualitative judgment and the availability of staff resources. 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/DSIR will review those prioritized as HIGH and 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.

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 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 Director, DSIR, 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 Deputy Director for Generic Issues and Rulemaking, RES.

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

d. RES/DSIR will issue a quarterly status summary of Generic Issue resolutio n progress through the Generic Issue Management Control Systems (GIMCS), by the second week of each quarter. Quarterly reports will also be provided by the Director, RES, to the EDO highlighting progress, problem areas, and schedule changes.

e. RES/DSIR 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
Attachment 2

Attachment 1

GENERIC ISSUE INFORMATION

To the extent practical, the following information should be provided in sufficient detail to permit the proposed issue to be analyzed and prioritized 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.

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 (memorandum, NUREGs, SRPs, etc.) should be provided.

10. The transmittal memorandum should reflect the concurrence of the office of the originator, 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	As appropriate
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
o Date information requested from division			
o Date received from Division			
o Proposal Solicited			
o Proposal Evaluated and Accepted			
o Contract Schedule, if applicable			
o Testing Schedule, if applicable			
o Draft NUREG/CR report from contractor/consultant			
o Staff review of draft NUREG/CR report			
o Value Impact Statement prepared			
o Final report prepared by Division			
o Final report forwarded to RES for processing			
o RES Director Review completed			
o Review Package to CRGR			
o CRGR review completed			
o EDO approval			
o Federal Register Notice of Issuance of SRP for Public Comment			
o OMB Clearance if applicable			
o Division review of public comment completed			
o RES Director review completed			
o CRGR review completed			
o EDO approval			
o Federal Register Notice of Issuancel of SRP			