



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

JUN 02 1994

Reference  
11924

PDR: R. EMRIT

MEMORANDUM FOR: RES Employees

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

SUBJECT: RES OFFICE LETTER NO. 1, REVISION 4, "PROCEDURE FOR  
IDENTIFICATION, PRIORITIZATION, RESOLUTION, AND TRACKING 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 from NRR to RES. Thus, 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. Subsequently, OL-1, Revision 1 was issued on March 22, 1989, OL-1, Revision 2 was issued on July 12, 1991, and OL-1, Revision 3 was issued on November 26, 1991. The purpose of this revision is to reflect changes in the generic issue prioritization procedure to include consideration of the risk associated with a plant life extension of twenty years, and to incorporate the procedure for the resolution of generic issues previously delineated in OL-3, Revision 2. This action eliminates the need for OL-3 which is being simultaneously withdrawn.

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 three stages (Identification, Prioritization, and Resolution) including Tracking. The procedures for managing generic issues through 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 take appropriate action to resolve those identified for further pursuit. Since potential generic issues may arise from different offices within NRC headquarters or from outside sources such as the ACRS, Regional offices, or the public, and since the prioritization and resolution 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 to allow RES to make an assessment of their priority.

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Add: R. EMRIT, Res

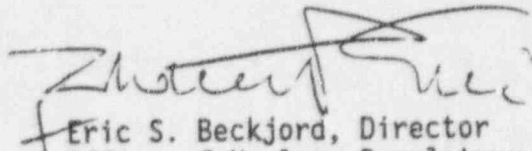
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RES Employees

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This procedure is not intended for use in screening all current or future work going on within NRC (which may be initiated through various mechanisms), but it 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, Resolution,  
and Tracking of Generic Issues

cc: J. Taylor, EDO

ENCLOSUREPROCEDURE FOR IDENTIFICATION, PRIORITIZATION, RESOLUTION, AND TRACKING  
OF GENERIC ISSUESI. INTRODUCTIONDefinitions

A generic issue is a concern that is applicable to all, several, or a class of nuclear reactors or reactor-related facilities. Generic issues can arise from various concerns and, accordingly, are classified into one of the following four categories: Safety, Regulatory Impact, Environmental, or Licensing.

A Generic Safety Issue (GSI) is 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 the potential to require licensees to make safety improvements and/or require the promulgation of new or revised requirements or guidance. A Regulatory Impact (RI) issue is 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) involves impacts on those items protected by the National Environmental Policy Act (NEPA). A Licensing Issue (LI) addresses actions the NRC staff should take to: (1) increase its knowledge, certainty, and/or understanding of safety issues in order to gain confidence in assessing levels of safety; (2) improve or maintain the NRC capability to make independent assessments of safety; (3) establish, revise, and carry out programs to identify and resolve safety issues; (4) document, clarify, or correct current requirements and guidance; or (5) improve the effectiveness or efficiency of the review of applications.

Generic Issue Program

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

Identification

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

### Prioritization

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 impact/value ratio developed from this assessment, and as further adjusted by qualitative judgments and other considerations, a priority is assigned to each GSI. Generally, RIs, LIs, and EIs are evaluated based on qualitative judgments of their technical merits; however, quantitative assessments can be made if data is readily available. The preliminary priority assessment for each issue is 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. NUREG-0933, which is updated semi-annually, serves as the repository for all prioritization evaluations.

Issues that are assigned a priority of HIGH, MEDIUM, or NEARLY-RESOLVED move on to the resolution stage. An issue assigned a LOW or DROP priority by nature of the rating standard has such a low public risk reduction potential that resolution is not pursued. All HIGH priority GSIs are periodically reviewed for designation as Unresolved Safety Issues (USIs). Generic issues not assigned staff resources for resolution (LOW or DROP) may be reassessed in the future if new information becomes available that could change the original priority or classification. In accordance with Staff Requirements Memorandum (SRM) 871021A, a periodic review of LOW priority GSIs is conducted to determine whether such information exists. The resolution of all issues is documented in NUREG-0933.

### Resolution

Resolution starts with receipt of the approved prioritization by the assigned Division and selection of a Task Manager. Strong effort by the Task Manager is needed to keep the resolution moving. Experience has shown that significant delays often occur during the review and concurrence procedures below that involve many interfaces among organizational sub-elements in the NRC. It takes the Task Manager's personal involvement with a willingness to explain and schedule meetings and make presentations in order to stimulate and obtain the necessary actions.

GSIs with priority designations of HIGH, MEDIUM, or NEARLY-RESOLVED, and RIs, LIs, and EIs are assigned by the RES Director to the appropriate NRC Office for resolution. Most GSIs are usually resolved within RES; however, other offices may be assigned GSIs for resolution. Similarly, LIs can be assigned to RES or NRR for disposition. RIs and EIs are assigned within RES and work on the resolution of these issues must be approved by RES management after consideration of the qualitative assessments 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.

It is important to pursue resolution for those issues that are likely to result in requirements and/or industry actions that cause licensee actions resulting in



substantial net plant safety improvement. It is also important to consolidate and integrate issues and their resolutions to achieve the best safety benefit.

Interfacing should be planned as frequently as possible; occasional informal coordination may be appropriate. Early and continuing face-to-face coordination between participating NRR and RES staff and management is recommended to facilitate resolution and imposition.

### Tracking

The status of the resolution of those generic issues identified for further pursuit is tracked in the Safety Issues Management System (SIMS) which contains a synopsis of each issue that includes its work scope, work status, and program milestones. Quarterly SIMS reports are sent to the EDO as part of the Generic Issue Management Control System (GIMCS) which provides the status of the prioritization and resolution of all generic issues. This quarterly update of the information in GIMCS provides an excellent management opportunity to review progress and suggest new initiatives as appropriate.

## II. PROCEDURES

### Identification

- (1) The originator of a generic issue should include all the information specified in Attachment 1 so that there is a clear understanding of the issue and its safety significance.
- (2) Proposed generic issues submitted to RES should be addressed to the RES Director. All new issues received by RES will be sent to DSIR/RES for action.
- (3) DSIR/RES will screen all proposed generic issues for duplication or overlap with previously identified generic issues and to ascertain whether they are generic or plant-specific. Proposed issues that may be plant-specific will be sent to NRR for review and appropriate action.
- (4) DSIR/RES will assign a number to each generic issue identified 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: (1) the issue is covered by another existing issue or Multi-Plant Action (MPA); (2) it has been accepted for prioritization; or (3) additional information is needed.
- (5) After 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 the Associate Director for Inspection and Assessment (ADT) in NRR for an immediate action determination and screening for identification of overlap or duplication with already imposed or completed MPAs. Generally, 15 days are allowed for the NRR response.
- (6) DSIR/RES shall include all new generic issues in Table 2 of NUREG-0933.

Prioritization

- (1) DSIR/RES will classify each accepted generic issue as a GSI, RI, LI, or EI. Based upon this classification, one of the following actions will be taken:
  - (i) RIs, LIs, and EIs will be evaluated and their merits quantitatively or qualitatively estimated and described in a preliminary assessment report.
  - (ii) GSIs will be evaluated and assigned a preliminary priority ranking based on engineering judgment and/or very rough quantitative risk calculations. This preliminary ranking, based primarily on safety significance, will be used to establish the following order of importance for prioritizing the remaining issues: HIGH, MEDIUM, NEARLY-RESOLVED, LOW, DROP.
- (2) DSIR/RES will prepare a draft prioritization evaluation for each generic issue using the methodology described in the Introduction of NUREG-0933 and the guidelines published in NUREG/CR-2800. GSIs will be assigned a priority ranking of HIGH, MEDIUM, NEARLY-RESOLVED, LOW, or DROP based on their estimated public risk reduction potential, impact/value ratio, and other considerations, including a license renewal period of 20 years for the affected plants.
- (3) DSIR/RES will send the draft prioritization of each generic issue to appropriate NRC personnel for peer review prior to finalizing its priority. Those involved in the peer review process will include the DSIR Division Director, DSIR Branch Chiefs, ADT/NRR (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 those GSIs with a priority recommendation of LOW or DROP. ADT/NRR will be provided information copies of the evaluation for GSIs with a HIGH, MEDIUM, or NEARLY-RESOLVED priority recommendation and issues classified as RI, EI, or LI. The Offices designated for peer review for an issue are to provide comments on the draft prioritization and the priority ranking to DSIR/RES 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 such a case, a review schedule will be developed by NRR and RES will be informed.
- (4) Based upon the results of the peer review, DSIR/RES 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 RES Director for approval.
- (5) GSIs approved with a priority of HIGH, MEDIUM, or NEARLY-RESOLVED will generally be assigned by the RES Director to the appropriate RES division for resolution. However, the RES Director can request the transfer of the resolution of a GSI to another NRC Office after consideration of such factors as technical expertise, resources, and ongoing work in the subject area. For issues approved as LIs, the RES Director will send the final assessments to RES or NRR for disposition, as appropriate, based on the nature of the issue. Issues approved as RIs or EIs will be assigned by the

RES Director to RES for resolution based upon qualitative judgment and the availability of staff resources. In addition, the RES Director will send all prioritization evaluations of generic issues to other Offices, the ACRS, and the Public Document Room for information and comment.

- (6) DSIR/RES will publish the approved prioritization evaluation in a Supplement to NUREG-0933.
- (7) DSIR/RES will periodically review unresolved HIGH priority GSIs and provide a recommendation to the RES Director as to whether they should be designated as candidate Unresolved Safety Issues; criteria to be used for this review are documented in NUREG-0705.
- (8) DSIR/RES will periodically review all LOW priority GSIs to determine whether there is any new information that would warrant reassessment of the original prioritization.

#### Resolution

- (1) Upon receipt of the assignment for resolving an issue, the responsible Division Director shall select a Task Manager.
- (2) The Task Manager shall perform a quick review of the issue to evaluate the risk, the possible resolutions, and the cost of such resolutions using very limited time and resources in order to identify a resolution that is obviously cost-beneficial. Such a quick review could limit the cost of resolutions that could be justified with the determined risk, based on the backfit rule, or might also indicate that the issue could be handled best by consolidation or integration with other issues. The purpose of this review is to arrive at a quick resolution, if possible, without the need for expending large resources of time, manpower, and contractor assistance. The cognizant Branch Chief should concur in any planning regarding a quick review.
- (3) If the quick review does not result in a resolution, the Task Manager shall prepare a plan and schedule for the work that needs to be done to resolve the issue. For a large and complex issue, this plan would be very elaborate with a large number of tasks described in detail; for a simpler issue, it would be much less elaborate. It is important that the plan be tailored for effective, efficient, and timely resolution of the issue. Within funding restraints, tasks should be done in parallel to minimize the overall schedule. This plan, often called a Task Action Plan (TAP), should be developed using the following guidelines.

Description: Include a background or history (including previous regulatory or industry actions), a definition, and the safety significance of the issue, including the affected plants, e.g., PWRs, BWRs, etc. The definition should be supplemented, as necessary, to clearly set forth the scope of the issue. The relationship to all other generic issues and programs (both those of the NRC and of outside groups such as DOE, EPA, NEI, INPO, Owners' Groups, and foreign activities) should be discussed. Consideration should also be given to current plans for legislation, Rules, Regulatory Guides, policies, licensing, inspection, industry/licensee actions, bulletins, and generic letters. These

relationships may also partly define the scope and depth of the issue resolution.

Action Plan: The plan for resolving the problem should include the following tasks:

- (a) A task that describes the development of the necessary technical information and understanding that may culminate in a formal staff NUREG or contractor NUREG/CR report to present the technical findings.
- (b) A task that, given the technical findings, develops a number of alternative licensing actions that could be used to resolve the issue. This should include the identification and development of any necessary regulations, regulatory guides, licensing and inspection guidance, standard review plans, generic letters, bulletins or information notices required to achieve the safety benefit of the resolution.
- (c) A task that estimates the incremental net risk reduction that could be achieved for each alternative proposed. Both decreases and increases (e.g., public and/or occupational exposure during plant implementation and thereafter) should be estimated.
- (d) A task that estimates the net costs to the public, the licensees, and the NRC associated with each alternative. Both increased costs due to design, installation, operation, and maintenance and decreased costs due to improved reliability and plant availability (including averted accidents and precursors) should be estimated using the guidelines of NUREG/CR-3971 and NUREG/CR-4568.
- (e) A task that documents a regulatory analysis that discusses the alternatives and the impact/value of each and recommends an alternative that takes into account the requirements of the backfit rule as seen for the issue. This analysis should be reviewed in accordance with RES Office Letter No. 2, "Procedure for Obtaining Regulatory Impact Analysis Review and Support." The analysis should follow the requirements of 10 CFR 50.109 and the guidelines of NUREG/BR-0058, Revision 2 (Draft), NUREG/BR-0184 (Draft), and NUREG/CR-3568. Other useful information is also included in the references to RES Office Letter No. 2.

Interface With NRC Technical Organizations: A discussion of the plans for coordination with other NRC technical organizations involved (especially NRR) should be included along with manpower requirements. All requests for NRR review of draft reports or assignment of an NRR contact for generic issue resolutions should be sent from the cognizant RES Branch Chief to ADT/NRR; ADT/NRR will determine the appropriate contact points in NRR. The Task Manager may suggest contacts but cannot assume or decide on an appropriate contact point unless designated by ADT/NRR. Failure of NRR to meet review or concurrence schedules will have to be addressed through ADT. ADT/NRR should be notified by telephone and a note approximately 2 to 3 weeks before any formal package is sent. Correspondence between NRR and



RES should be addressed to ADT/NRR with a copy to the NRR person with technical responsibility.

The three steps following resolution that lead to close-out of a generic issue are imposition, implementation, and verification; the NRC imposes a new requirement, licensees implement it, and the NRC verifies it, if necessary. Experience has shown that a plan for generic and plant-specific imposition is a very important part of resolution. It is important that the Task Manager's understanding and insight of the generic issue be considered in determining the detailed plan for generic and plant-specific imposition. Since NRR will be responsible for the imposition, coordination with NRR at this stage becomes particularly important. This should be arranged at the planning stage to the degree possible.

Manpower Requirements: Careful consideration should be given to the NRR resources that will be required to impose any resolution of a generic issue. NRR or the Regions may not have sufficient resources to review the imposition or verify the implementation of every issue. Proposed resolutions should be based on what technically makes the best sense and should not be compromised because of a lack of resources needed to implement a resolution. However, in reality, the need for a review before or after implementation by NRR or a verification inspection by the Regional Offices is very subjective. The RES Task Manager should work closely with the NRR contact(s) and attempt to structure the proposed resolution so as to minimize the agency resources needed. The Task Manager should carefully consider whether review by NRR is absolutely necessary to effectively implement an issue since justification in some detail of the needed resources will be required. Requiring licensees to maintain the information onsite and available for inspection can be adequate for many issues. The Task Manager should be prepared to assist NRR during the imposition and implementation phases.

Technical Assistance Contracting: A discussion of the technical assistance required to do the work should be included. Specific procedures for technical assistance contracting to be followed in RES are provided in "RES Policy and Procedures Manual, Section 4, Contracts."

Interaction With Outside Organizations: Consideration should also be given to involving appropriate industry groups such as the Nuclear Energy Institute (NEI) - formerly NUMARC, Owners' Groups, EPRI, or others. Discussions and agreements can help to ensure industry understanding of the resolution and effective implementation. Procedures that ensure the independence and openness of the NRC need to be followed in pursuing this path. A discussion should be included to address the planned coordination with outside organizations such as licensees, industry groups, NSSS vendors, ACRS, and others, as appropriate. There is no explicit procedural guidance available at the present time. The preferred approach is to conduct meetings open to the public and place minutes of the meetings with enclosures in the Public Document Room (PDR). Any draft documents that are provided to or received from an outside organization should also be placed in the PDR.

Resource Requirements: The total resource requirements of manpower in person-years and contract dollars by fiscal year for all participating Offices should be provided.

Proposed Schedule: The proposed schedule for resolution with major milestones should be provided for incorporation into the Generic Issue Management Control System (GIMCS).

Additional Material: Any additional explanatory material deemed necessary should be provided.

The TAP does not have to follow any explicit format or content. The only requirement is that the work plan, needed resources, coordination points, and schedule be made clear.

- (4) The TAP shall be approved by the Division Director of each participating division with responsibility for resolution. A copy of the TAP shall be sent to DSIR/RES so that the appropriate milestones can be incorporated into GIMCS.
- (5) Integration and coordination of the resolution of generic issues with other generic issues, NRC programs, and outside activities is essential. The prime responsibility for this integration and coordination lies with the Task Manager who must take the initiative to seek out all related issues and programs, ensure coordination and integration, resolve differences, and elevate inconsistencies to management when necessary. It is the Task Manager's responsibility to recommend closure of an issue at any time during the resolution phase, if the issue has been determined to be resolved or superseded by subsequent NRC programs independent of the generic issue program, e. g., Standard Technical Specifications, Standard Review Plan (SRP), Information Notices, and Bulletins.
- (6) After completing the draft TAP, the Task Manager shall provide NRR with a copy requesting comment to ensure that the proposed path to resolution identifies practical objectives, schedules, and NRR/Region resources. NRR assignment of a lead contact should be confirmed. This contact need not review the detailed technical information developed by RES but should be involved in the key decisions such as which alternative resolution approaches are to be considered. A copy of the draft TAP should also be sent to ACRS for information.
- (7) A final TAP should be sent to NRR, other involved Offices, and the ACRS for information. Any time-significant changes, especially in scope, that are made means that an update of the plan should be sent to NRR, other involved Offices, and ACRS for information.
- (8) Upon completion of draft NUREG reports (contractor or staff), the Task Manager shall provide NRR with a copy for information. NRR has stated that they will generally not serve as a part of the technical review of these documents. Generally, a detailed management review of the draft documents by the Section Leader, Branch Chief, and Division Deputy Director will suffice. However, on a case-by-case basis, a technical review may be needed or considered to be highly desirable. This type of participation in

- the technical review process should be explicitly requested for those issues. This should be arranged during the planning stage if possible.
- (9) At the completion of a draft resolution package, the Task Manager shall provide NRR with a copy for information.
- (10) The Task Manager shall obtain NRR concurrence at the completion of a final resolution package that recommends the imposition of a new requirement. Resolutions with no new requirements or guidance for licensees (and therefore no imposition by NRR) do not need concurrence by NRR or any other Office, but NRR should be given a copy of the close-out resolution informally prior to obtaining RES Office Director approval. This resolution package should contain the following information:
- (a) A clear and definitive presentation of the issue, including any background information necessary to understand the issue, its safety significance, and the sense of urgency for resolving the issue.
  - (b) Alternative ways to resolve the issue, including "do nothing," with an impact/value analysis of each alternative. Analyses should include consideration of a 20-year license renewal period for the affected plants.
  - (c) A recommended alternative and a discussion of the decision rationale for its selection.
  - (d) A plan for schedule and method of generic and plant-specific imposition (Rule, Order, Bulletin, Generic Letter, other) and any new or revised guidance (SRP, Regulatory Guide, inspection, other) that codifies the new requirement.
- (11) An initial draft should be coordinated with other divisions in RES and, after review by the Task Manager's Division Director, NRR and, at the same time, other offices such as OGC, AEOD, and NMSS, as deemed necessary. If new requirements or guidance are proposed, concurrence on the final package should be requested by using parallel copies for each office. The office that originated the issue should generally concur. ACRS and CRGR review and comment should be scheduled so that their reviews occur at about this time. If there is no new requirement or guidance, the resolution package is sent to the ACRS from the cognizant Division Director for their determination if they wish to review the staff's proposed resolution of the issue. The ACRS will normally be requested to inform the staff within 1 month if they decide to review the resolution. Following appropriate consideration by the ACRS, the resolution package is sent to the EDO from the RES Director with a copy to the CRGR but without CRGR or any other review outside RES.
- (12) After CRGR and ACRS review and consideration of comments, the resolution package shall be sent to the EDO from the RES Director and, if rulemaking is involved as a part of the resolution, to the Commission for consideration.
- (13) If a new Rule, Rule Change, addition or change to the SRP or Regulatory Guide is a part of the resolution, it must be issued for public comment

with an appropriate Federal Register notice. After the comments are received and addressed appropriately, the review and concurrence procedures described above are repeated for the final resolution.

### Tracking

- (1) DSIR/RES shall assign a number to any new generic issue identified for prioritization and amend all affected Tables in GIMCS.
- (2) The RES Division Director assigned the task of resolution of a newly-approved issue will submit a copy of the work plan, including a detailed schedule and plan for the regulatory analysis, to the RES Director within 6 weeks of being assigned the issue. This submittal shall contain the information listed in Attachment 2. For issues assigned to other Offices for resolution, the above information shall be supplied to the RES Director from the cognizant Office Directors.
- (3) The Chief of the cognizant NRC branch will submit status reports for each approved work plan to the DSIR/RES Director 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. For issues assigned to RES for resolution, approval of schedule slippage must be obtained from the RES Deputy Director for Generic Issues and Rulemaking.
- (4) DSIR/RES will provide updates to SIMS quarterly to incorporate approved work plans for new generic issues and incorporate modification to and/or changes in schedule information for existing work plans.
- (5) DSIR/RES will prepare a quarterly status report (GIMCS) on the progress of resolution of unresolved GSIs for issuance from the RES Director to the EDO. This report will contain an extract from SIMS and will highlight progress, problem areas, and schedule changes.
- (6) DSIR/RES will publish Supplements to NUREG-0933 semi-annually to document all issues prioritized and resolved during the previous six-month period.
- (7) DSIR/RES will prepare an annual report to the Commission on the progress of resolution of GSIs.

### III. REFERENCES

NUREG/BR-0058, Revision 2 (Draft), "Regulatory Analysis Guidelines for the U.S. Nuclear Regulatory Commission," August 1993.

NUREG/BR-0814 (Draft), "Regulatory Analysis Technical Evaluation Handbook," August 1993.

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 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 that discusses the background (bases) and perceived safety significance of the issue (i.e., contribution to risk, core melt frequency or public dose) should be provided. The issue should be scope 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.

Attachment 1 (Continued)  
GENERIC ISSUE INFORMATION

- (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.

Attachment 2  
GENERIC ISSUE MANAGEMENT CONTROL INFORMATION

<u>Item Number</u>	(Generic Issue Number)
<u>Title</u>	(Generic Issue Title)
<u>Lead Office/Div/Br</u>	As appropriate
<u>Other Office/Div/Br</u>	As appropriate
<u>Task Manager</u>	(Name)
<u>TAC Number</u>	(As assigned)
<u>Work Authorization</u>	(if different from Parts A, B, and C of Appendix F from Operating Plan)
<u>Contract Title</u>	Provide Contract Title (if contract issued)
<u>Contractor Name/ FIN No.</u>	Identify Contractor Name and FIN Number (as appropriate)
<u>Work Scope</u>	Describe briefly the work scope for completing the issues
<u>Affected Documents</u>	Issue NUREG- Revise and issue Regulatory Guide 1.xx; Revise and issue SRP Section x.x.x.; Revise and process STS change
<u>Technical Resolution</u>	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.
<u>Status</u>	Describe current status of work.
<u>Problem/Resolution</u>	Include potential problems and actions being taken to resolve them.



Attachment 2 (Continued)  
GENERIC ISSUE MANAGEMENT CONTROL INFORMATION

<u>Milestone Examples</u>	<u>Original</u>	<u>Current</u>	<u>Actual</u>
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 issuance of SRP			