DETAILED RESPONSES RECEIVED FROM I&E

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

NOV 16 1978

MEMORANDUM FOR: Harold R. Denton, Director, Office of Nuclear Reactor Regulation

FROM: Norman C. Moseley, Director, Division of Reactor Operations Inspection, Office of Inspection and Enforcement

SUBJECT: REVIEW OF REGULATORY ACTIONS AND STAFF POSITIONS WHICH RELY ON WASH-1400

An October 27, 1978 memorandum from L. V. Gossick requested designated NRC Offices to survey their staffs to identify uses of WASH-1400 and to provide copies of staff actions or positions. Your Office was designated to coordinate these responses.

A survey of IE Headquarters and regional office technical staffs has identified only the following IE uses:

1. In periodic updating of the IE reactor inspection procedures, a cross-check has been made to determine that WASH-1400 high risk event related procedures and equipment receive appropriate inspection attention. Although the specific values stated in WASH-1400 were used in this evaluation, they were used to make subjective comparisons and to confirm previous conclusions.

2. IE has, through several studies, attempted to determine how the insights gained through WASH-1400 could be applied to improving our inspection program. One specific study has been completed and a report issued, "Insights Into Improving The Efficacy Of Nuclear Power Plant Inspection Procedures Based Upon Risk Analysis" (NUREG CR-0153). This study, done by Battelle, considered use of risk analysis as a means of improving IE inspection. It utilized in a qualitative sense the "important accident sequences identified in WASH-1400." Presently underway is a study by Sandia on " dependent Verification Options Amenable For Conduct By IE" which employs the RSS methodology and the RSS findings similar to the way the findings were used in the Battelle study. As a follow-on to the Battelle study,

we are actively negotiating a contract with Sandia to provide methods for IE to use risk analysis as a tool for resource allocation and to categorize risk related procedures with emphasis on human factors.

None of the above efforts has or will use WASH-1400 as an absolute indicator of what should be inspected. Rather, the results will continue to be used qualitatively and the methodology will be used to the extent practicable.

3. Some accident sequences taken from WASH-1400 were made the basis for scenarios in developing procedures for the Incident Response Center. This use is marginal in relation to the significant question being raised, but it is included here to assure completeness.

All of the above uses are believed to be Category 3 (see attachment to Mr. Gossick's memorandum). These uses of WASH-1400 did not result in specific written assessments in the sense of a regulatory decision or action; therefore, copies of documents do not appear to be relevant.

We believe that these uses of WASH-1400 are entirely consistent with the Lewis Committee recommendations and that reconsideration is not necessary.

Norman C. Moseley
Director
Division of Reactor
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and Enforcement

cc: J. G. Davis, IE

NUREG/CR-0153
BMI-2004

INSIGHTS INTO IMPROVING THE EFFICACY OF NUCLEAR POWER PLANT INSPECTION PROCEDURES BASED UPON RISK ANALYSIS

Final Report

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Prepared for

U. S. Nuclear Regulatory Commission