



POLICY ISSUE

(Information)

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SECY-86-346

FOR: The Commissioners

FROM: Victor Stello, Jr.
Executive Director For Operations

SUBJECT: EVALUATION OF MANAGING PLANT-SPECIFIC BACKFIT REQUIREMENTS

PURPOSE: To provide the Commission with an evaluation of the results of managing plant-specific backfit requirements.

BACKGROUND: In its 1984 Planning and Program Guidance document, the Commission directed the staff to provide an evaluation of the management of plant-specific backfit requirements after one year of experience gained from the application of the recommendations in SECY 83-321. Since the staff was revising 10 CFR 50.109, the evaluation was delayed until the backfit rule was revised and the associated NRC Manual Chapter (0514) was approved by the Commission and in use for six months. The revised 10 CFR 50.109 was issued on September 20, 1985, and the associated Manual Chapter 0514 was approved February 21, 1986.

This paper provides an evaluation of the implementation of plant-specific backfit requirements derived from the Backfit Rule.

DISCUSSION: Since the issuance of the revised Backfit Rule (10 CFR 50.109) and approval of Manual Chapter 0514, the staff has taken a number of steps to ensure the proper implementation of the revised rule. Shortly after Manual Chapter 0514 was issued, members of the EDO's staff provided briefings to NRC headquarters staff members. These briefings identified changes in the backfit rule, and provided a discussion of changes in staff implementation of backfits.

To assure a consistent approach to backfitting, each EDO Office prepared an instruction or updated existing instructions that detailed how that Office is to implement the new backfit rule and Manual Chapter 0514. Each of these instructions was reviewed by the EDO staff to assure consistency between Offices and consistency with the Manual Chapter.

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To assure continued management attention to, and support of, the backfit process, managers in the EDO's Offices are held accountable for adherence to the backfit process.

In April, May and June, 1986, the NRC staff, with members from the EDO's staff and the EDO Offices participating, conducted four workshops for industry representatives. These workshops involved briefings by the NRC staff on the new backfit rule, presentations by industry representatives on how the industry viewed the backfit rule, how the backfit rule would impact the industry, and question and answer periods.

Training has also been provided for regional personnel during 1986. This training, similar to that provided headquarters offices earlier in this year, provides details of staff implementation of the backfit rule. Regional training was conducted at meetings that included resident and senior resident inspectors from plant sites.

The training and workshops have provided an increased awareness in both the staff and the industry on the correct process necessary for implementation of new requirements in a controlled, technically accurate manner that will help assure any plant changes improve safety.

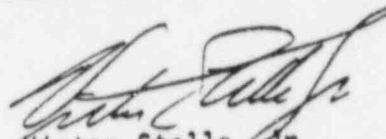
Monitoring of the management of plant-specific backfits is accomplished through use of the Plant-Specific Backfit System, a computer-based data system that uses the National Institute of Health (NIH) computer. As backfits are identified and work is accomplished, the data base is updated at a terminal within the appropriate Office to reflect the current status of the backfit. Data on each backfit is available at all times to all NRC locations involved in managing backfits.

Enclosure 1 provides a summary of the backfit issues that have been identified since the new backfit rule was issued in September, 1985. A potential backfit is identified for each issue and each unit to which the issue applies. A total of 29 potential backfits have been identified during this period. Of the total, 22 were identified by licensees. Twenty potential backfits have been resolved as shown in the Enclosure 1.

The effectiveness of the training provided on the backfit rule is evident in the increasing number of staff identified backfits, and in the quality and quantity of potential backfits identified from all sources. The issues that have been identified have generally been substantive. The combination of these considerations reflect the seriousness with which the industry and the staff are approaching backfit issues.

Of the issues that have reached the point of having regulatory analyses performed, one required immediate imposition so the regulatory analysis followed the imposition, two regulatory analyses have demonstrated the four associated backfits to be cost-effective, and one analysis has shown the three associated backfits not to be cost-effective. One of the cost-effective backfits is currently undergoing management review for issuance.

The staff through its training sessions and system for formal monitoring of plant-specific backfits, has taken a number of actions to implement the revised backfit rule. The effectiveness of these efforts is reflected in the six staff-identified backfits that have been identified since this training began, compared to three licensee-identified backfits during the same period. In contrast, one staff-identified and nineteen licensee-identified backfits were identified in the six months before the training began. This reflects a trend towards more effective and efficient identification, evaluation, and processing of potential backfits.



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Enclosure: As stated

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ENCLOSURE
SUMMARY OF BACKFIT ISSUES

1. Number of Potential Backfits Considered: 29

| <u>Office</u> | <u>Licensee Identified</u> | <u>Staff Identified</u> | <u>Total</u> |
|---------------|----------------------------|-------------------------|--------------|
| NRR | 21 | 6 | 27 |
| IE | 0 | 0 | 0 |
| NMSS | 1 | 0 | 1 |
| R-I | 0 | 0 | 0 |
| R-II | 0 | 0 | 0 |
| R-III | 0 | 1 | 1 |
| R-IV | 0 | 0 | 0 |
| R-V | 0 | 0 | 0 |
| Totals | 22 | 7 | |

2. Number of Potential Backfits Resolved: 20

a. Number of Potential Backfits That Were Resolved

By Imposition as Backfits:

1. Due to need for immediate imposition to assure no undue risk:

1

2. Backfits issued following completion of Regulatory Analysis:

2

b. Number of Potential Backfits That Were Resolved

But Not Imposed As Backfits:

17

1. Due to licensee agreement that issue was one of compliance with applicable regulatory position:

11

2. Due to staff withdrawal of issue after licensee provided additional information:

1

3. Due to staff withdrawal of issue after licensee proposed acceptable alternative:

2

4. Staff did not impose potential backfit after Regulatory Analysis showed imposition would not be cost-beneficial:

3

3. Potential Backfits Currently Under Review: 9
4. Potential Backfits for which Regulatory Analyses have been completed: 7
 - a. Backfits justified: 4
 - b. Backfits not justified: 3
5. Age of Potential Backfits from Identification as potential backfit to resolution as backfit:

| | | |
|---------------------|-------------------------|------------------------------|
| maximum: 22 months | 1985 average 7.7 months | (6.6 w/o the 22 month issue) |
| minimum: 2 weeks | 1986 average 2.3 months | |
| average: 5.5 months | | |