

OCT 2 1978

MEMORANDUM FOR: Harold D. Thornburg, Director, DRCI, IE
FROM: Guy A. Arlotto, Director, DES, SD
SUBJECT: STANDARDS REVIEW REQUESTS

I have reviewed your memorandum dated August 23, 1978 stating that IE has found a sizeable fraction of standards developed under the aegis of the American National Standards Institute (ANSI) tutorial rather than specific. You observe that most of the standards in this category are sponsored by the American Nuclear Society (ANS), and you cite two recent examples, ANSI N658/ANS-51.7 and ANSI N403/ANS-6.4, suggesting that the NRC not endorse these particular standards with regulatory guides.

I agree with your observation that a standard lacking specific requirements is difficult, if not impossible, to enforce and that, in general, such standards should not be endorsed by regulatory guides. In fact, we continue to emphasize this point in correspondence with ANS as well as with other societies who submit standards lacking sufficient specificity. Furthermore, I share your observations concerning the two example standards cited; neither standard contains a great number of specific requirements that are inspectable or verifiable, and design adequacy would be difficult to verify without access to more detailed specifications or design documents. At the same time, we in Standards recognize that we are a service organization and serve several customers. For the two standards you referenced, one of our customers, NRR, believes the standards have sufficient merit to be endorsed. On this basis, we intend to go forward.

Concerning your suggestion to better monitor standards work, I agree that we should not spend significant amounts of staff time on standards not meeting NRC needs. To this end, most working groups preparing ANS standards include an NRC member. In addition to providing technical input, the NRC member has the responsibility to assure that a standard under preparation will be of value to NRC; otherwise the member has a responsibility to withdraw from participation.

CONTACT: M. S. Medeiros, Jr.
443-5913

OFFICE ►

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DATE ►

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In summary, let me assure you that we are committed to encouraging the development of standards that are specific and enforceable. As evidence of this commitment, Mr. Minogue used your memorandum to emphasize this point in a presentation to the ANSI Nuclear Standards Management Board on September 14, 1978.

Original signed by G. A. Arlotto

Guy A. Arlotto, Director
Division of Engineering Standards
Office of Standards Development

cc: N. C. Moseley
R. Vollmer, NRR
W. Kreger, DGE

bcc: R. B. Minogue
R. G. Smith
G. A. Arlotto
W. M. Morrison
D. F. Sullivan
J. A. Norberg
M. R. Fleishman
M. S. Medeiros, Jr. (3)

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Record Note: Memo was revised to emphasize our commitment to development of standards that are specific and enforceable.

Task No: NA File: ANS-50

9-29-78 MC	SD:RSSB	SD:RSSB	SD:GES	SD:ES		
OFFICE ▶	*****SEE PREVIOUS CONCURRENCES*****			G. Arlotto		
SURNAME ▶	M. Medeiros	D. Sullivan	W. Morrison			
DATE ▶	9/ /78	9/ /78	9/ /78	9/9/78		

MEMORANDUM FOR: Harold D. Thornburg, Director, DRCT, IE
FROM: Guy A. Ariotto, Director, DES, SD
SUBJECT: STANDARDS REVIEW REQUESTS

I received your memo dated August 23, 1978 commenting on the substance of standards prepared by the American Nuclear Society. Your memo suggests a program to monitor the scope and content of standards under development.

I agree with your conclusion that standards under development should be monitored to preclude spending significant amounts of NRC staff time on standards not meeting NRC needs. To this end, most working groups preparing ANS standards include an NRC member, generally from NRR or SD, but sometimes from IE, RES, or DRCT as well. In addition to providing technical input, the NRC member always has the responsibility to assure that a standard under preparation is of value to NRC; otherwise the member has a responsibility to withdraw from participation. Similarly, NRC personnel serving as members of management committees and steering committees have the responsibility to assure that standards work to which NRC participation has a reasonable chance of meeting NRC regulatory needs. My observation is that we perform this function fairly well in both the working groups and management committees.

Concerning the specific design standards mentioned in your memo, N403, "Nuclear Analysis and Design of Concrete Radiation Shielding for Nuclear Power Plants" and N456, "Single Failure Criteria for LWR Fluid Systems," I have the following observations:

1. Standard N403 - This is a design standard which was approved by the NRC member during N17 committee balloting and which has formed the basis for a regulatory guide presently under review by the ACRS. I note that you have received a copy of a memorandum prepared by NRR which references your August 23 memorandum and which reaffirms NRR support for the ANS standard; the NRR memorandum explains, in detail, the basis for this support.

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2. Standard N658-This is a design standard which has been prepared by a working group with NRC membership and which has received staff review. On September 14, 1978, an "approve with comments" ballot was issued by the NRC representative on ANS Committee ANS-52. A copy of the ballot, the forwarding letter and the detailed comments are attached for your information and use.

In summary, both standards delineate design criteria rather than detailed specifications, and as such, do not easily lend themselves to "cookbook" type use during inspection. However, both standards are considered valuable as references for adequate design and therefore I expect both standards to be endorsed by Regulatory Guides. Your continued assistance in reviewing these standards is appreciated.

Guy A. Arlotto, Director
Division of Engineering Standards
Office of Standards Development

Enclosure: Letter from R. L. Baer (NRR) to
B. G. Schultz (S & W) forwarding
ballot and comments on ANSI N658

cc: N. C. Moseley
R. Vollmer, NRR
W. Kreger, DSE

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9-25-78 MC OFFICE	RSSB	RSSB	AD:GES	SD:ES
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DATE	9/25/78	9/25/78	9/25/78	9/29/78