

August 26, 2003

MEMORANDUM TO: Chairman Diaz  
Commissioner McGaffigan  
Commissioner Merrifield

FROM: William D. Travers */RA/*  
Executive Director for Operations

SUBJECT: FIFTH ANNUAL REVIEW OF APPLICATION-SPECIFIC,  
RISK-INFORMED REGULATORY GUIDES AND THE  
ASSOCIATED STANDARD REVIEW PLANS

In a staff requirements memorandum (SRM) dated June 29, 1998, the Commission directed the staff to (i) perform annual reviews and updates of application-specific, risk-informed regulatory guides (RGs) and the associated standard review plans (SRPs) and (ii) consider experience gained from risk-informed programs when updating the guidance documents. The related RGs and SRPs are as follows:

- RG 1.175 and SRP Chapter 3.9.7, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing"
- RG 1.176, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Graded Quality Assurance" (no SRP issued)
- RG 1.177 and SRP Chapter 16.1, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications"
- RG 1.178 and SRP Chapter 3.9.8, "An Approach for Plant-Specific Risk-Informed Decisionmaking Inservice Inspection of Piping"

The previous annual reviews were provided to the Commission on August 30, 1999, August 21, 2000, August 28, 2001 and October 4, 2002. In the 2003 review, we discuss these four RGs, and propose to discontinue the current periodic reporting requirement for them and replace it with progress updates via the Risk-Informed Regulatory Implementation Plan (RIRIP), which is revised semiannually.

RG 1.175 and RG 1.176

There are no plans at this time to revise RG 1.175 and RG 1.176 and the associated SRP chapters.

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RG 1.177 and SRP Chapter 16.1

Based upon staff and industry experience with using RG 1.177 for risk-informed technical specification changes, the staff has begun revising this RG and the associated SRP to clarify the use of engineering evaluations, particularly with regard to required actions and completion times associated with proposed technical specification changes. The staff plans to complete drafts of these documents next year.

RG 1.178 and SRP Chapter 3.9.8

This month, the staff expects to issue a revision to RG 1.178 and the associated SRP Chapter 3.9.8. These documents address risk-informed changes to inservice inspection (ISI) programs. These documents have been revised, with minor changes, to reflect the staff and industry experience gained during the course of staff reviews of, and the implementation of, licensee applications for changes in ISI programs since the issuance of RG 1.178 and the SRP in 1998. A public meeting was held in March 2003 to solicit comments on the proposed changes before finalizing the revisions.

Proposed Changes to the Current Reporting Requirements

In a memorandum from William Travers to the Commissioners, July 14, 2003, "Annual Review of RG 1.174 and SRP Chapter 19," it was proposed that the staff discontinue the practice of submitting annual status reports for RG 1.174, "An Approach for Using Probabilistic Risk Assessments in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis." We make the same request for the four risk-informed regulatory guides and the associated SRP chapters which are the subject of this memorandum.

These four RGs and SRPs were first issued in 1998. The staff now sees these documents as mature. As discussed above, RG 1.178 and the associated SRP have been revised once and RG 1.177 is currently undergoing revision. Beyond that, there are no plans to revise the other two RGs unless a specific, heretofore unforeseen, need arises. If a future revision is deemed necessary, adequate communication to all parties will precede its publication, including public workshops and ACRS presentations.

The staff will continue to inform the Commission of the status of all risk-informed activities, such as revisions to 10CFR50.46. Ultimately, these initiatives may point to the need for additional revisions to these risk-informed RGs. If so, we believe it is more appropriate to discuss proposed changes in the context of the overall risk-informed activity rather than on a stand-alone basis as is currently required annually.

Unless otherwise directed by the Commission, the staff plans to pursue the course of action recommended herein, namely to discontinue annual reporting on RGs 1.175, 1.176, 1.177, and 1.178 and the associated SRP chapters. Future communications regarding these regulatory guides will be integrated into ongoing risk-informed initiatives, as described in the RIRIP.

SECY, please track.

cc:    SECY  
      OGC  
      OCA  
      OPA  
      OCFO