

May 1, 2000

MEMORANDUM William D. Travers

TO: Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary /RA/

SUBJECT: STAFF REQUIREMENTS - SECY-00-0074 - REGULATORY GUIDE FOR ASSESSING AND MANAGING RISK BEFORE MAINTENANCE ACTIVITIES AT NUCLEAR POWER PLANTS

The Commission has approved the staff's recommendation to publish [Regulatory Guide \(RG\) 1.182](#), "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants," as described in [SECY-00-0074](#). The Commission also approved extending the implementation period for the revised 10 CFR 50.65 to 180 days after issuance of the final regulatory guide.

The staff should clarify in the subsequent Federal Register notice that it has decided to issue RG 1.182 as a companion guide to **RG 1.160** rather than a revision to RG 1.160, and that this action triggers the clock for the effectiveness of the rule.

Until the revised 50.59 rule becomes effective, performing a 50.65(a)(4) assessment in lieu of a 50.59 review may result in literal noncompliance with the existing 50.59 rule. Should this occur, the staff should continue its policy of exercising enforcement discretion for violations of the existing rule that would not be violations of the revised 50.59 rule. The existing 50.59 Enforcement Panel, consisting of representatives from NRR, OE, and OGC, should continue to review all 50.59 violations during this transition phase to ensure consistent disposition of findings.

The staff should promptly inform the Commission of significant problems associated with licensee implementation of [10 CFR 50.65 \(a\)\(4\)](#).

cc: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield
OGC
CIO
CFO
OCA
OIG
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Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)
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