



SECRETARY

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 7, 2019

COMMISSION VOTING RECORD

DECISION ITEM:                   SECY-18-0093

TITLE:                               RECOMMENDED CHANGE TO VERIFICATION OF THE  
DESIGN RELIABILITY ASSURANCE PROGRAM

The Commission acted on the subject paper as recorded in the Staff Requirements Memorandum (SRM) of August 7, 2019.

This Record contains a summary of voting on this matter together with the individual vote sheets, views and comments of the Commission.

A handwritten signature in blue ink, appearing to read "Annette Vietti-Cook".

Annette L. Vietti-Cook  
Secretary of the Commission

Enclosures:

1. Voting Summary
2. Commissioner Vote Sheets

cc: Chairman Svinicki  
Commissioner Baran  
Commissioner Caputo  
Commissioner Wright  
OGC  
EDO  
PDR

VOTING SUMMARY – SECY-18-0093

RECORDED VOTES

	<u>APPROVED</u>	<u>DISAPPROVED</u>	<u>ABSTAIN</u>	<u>NOT PARTICIPATING</u>	<u>COMMENTS</u>	<u>DATE</u>
Chrm. Svinicki	X				X	07/31/19
Cmr. Baran	X				X	10/16/18
Cmr. Caputo	X				X	08/02/19
Cmr. Wright	X				X	08/01/19

**NOTATION VOTE**

**RESPONSE SHEET**

**TO:** Annette Vietti-Cook, Secretary  
**FROM:** CHAIRMAN SVINICKI  
**SUBJECT:** SECY-18-0093: Recommended Change to Verification of the Design Reliability Assurance Program

Approved XX Disapproved \_\_\_\_ Abstain \_\_\_\_ Not Participating \_\_\_\_

COMMENTS: Below XX Attached \_\_\_\_ None \_\_\_\_

I approve the staff's recommendation to discontinue the use of inspections, tests, analyses, and acceptance criteria – referred to as ITAAC – to verify the effectiveness of the design reliability assurance program (D-RAP). While our predecessors who established the current implementation approaches to the certification of advanced light water reactors and the verification of compliance with the terms of combined licenses captured much wisdom in their thinking, they could not have foreseen every aspect of how the pieces of these processes would ultimately fit together in practice. Based on its current experiences, the staff has concluded that, when the D-RAP is fully described, the ITAAC related to D-RAP play no useful role and provide no substantive safety benefit. I approve the recommendation to discontinue their use.

  
\_\_\_\_\_  
SIGNATURE

07/31/19  
\_\_\_\_\_  
DATE

Entered on "STARS" Yes  No \_\_\_\_

**NOTATION VOTE**

**RESPONSE SHEET**

**TO:** Annette Vietti-Cook, Secretary  
**FROM:** Commissioner Baran  
**SUBJECT:** SECY-18-0093: Recommended Change to Verification of the Design Reliability Assurance Program


Approved  Disapproved  Abstain  Not Participating

**COMMENTS:** Below  Attached  None

In this paper, the NRC staff recommends discontinuing the use of inspections, tests, analyses, and acceptance criteria (ITAAC) to verify the effectiveness of an applicant's design reliability assurance program (D-RAP). According to the staff, the scope of the D-RAP is fully described in both a design certification application and a combined license application. As a result, the staff has concluded that ITAAC for D-RAP "are unnecessary and provide little value." Based on my review of the single D-RAP ITAAC for the AP1000 design and other designs, I agree that the ITAAC is not necessary to verify the effectiveness of the D-RAP when the design certification application or combined license application already fully describes the program. For example, the substance of the AP1000 design D-RAP ITAAC is separately covered by NRC's quality assurance program requirements. I therefore approve the staff's recommendation.

**Entered in "STARS"**

Yes   
No

  
\_\_\_\_\_  
**SIGNATURE**  
10/16/18  
\_\_\_\_\_  
**DATE**

**NOTATION VOTE**

**RESPONSE SHEET**

**TO:** Annette Vietti-Cook, Secretary  
**FROM:** Commissioner Caputo  
**SUBJECT:** SECY-18-0093: Recommended Change to Verification of the Design Reliability Assurance Program

Approved  X  Disapproved       Abstain       Not Participating      

COMMENTS: Below  X  Attached       None      

In this paper, the staff seeks the Commission’s approval to discontinue the use of inspections, tests, analyses, and acceptance criteria (ITAAC) to verify the effectiveness of the design reliability assurance program (D-RAP). I agree with Commissioner Baran’s assessment. The scope of the D-RAP and its implementation are fully described in the application for a design certification (DC) and again, modified as necessary, in each combined license (COL) application. Staff experience acquired from the reviews of several DC applications and the issuance of multiple COLs has demonstrated that the D-RAP ITAAC are unnecessary, provide little value, and if maintained, would impose an unnecessary burden on COL holders and the staff, without commensurate safety benefit.


Based on the staff’s information, I agree that ITAAC are not necessary to verify the implementation of the D-RAP provided the program is fully described in design certification or combined license applications. Therefore, I approve the staff’s recommendation.

In addition, as part of the ongoing Part 52 lessons learned project, the staff should assess whether there are efficiencies to be gained in the design reliability assurance program.

**Entered in STARS**

Yes  X

No      

  
\_\_\_\_\_  
**Signature**  
8/2/19  
\_\_\_\_\_  
**Date**

**NOTATION VOTE**

**RESPONSE SHEET**

**TO:** Annette Vietti-Cook, Secretary  
**FROM:** Commissioner Wright  
**SUBJECT:** SECY-18-0093: Recommended Change to Verification of the Design Reliability Assurance Program

Approved  X  Disapproved   Abstain   Not Participating

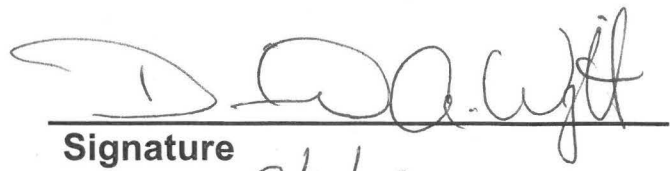
**COMMENTS:** Below  X  Attached   None

I approve the staff's recommendation to discontinue the use of inspections, tests, analyses, and acceptance criteria (ITAAC) to verify the effectiveness of the design reliability assurance program (D-RAP).

The staff determined that the D-RAP was fully described in design certification (DC) and combined license (COL) applications. The staff has also inspected the D-RAP at new reactor sites under construction and concluded that the program has been implemented in a manner consistent with the program description in the applications. Based on the results of its reviews and inspections, the staff concluded that the objectives of the D-RAP are already being accomplished and that the D-RAP ITAAC would therefore "impose an unnecessary burden on COL holders and the staff without commensurate safety benefit." Discontinuing the use of the D-RAP ITAAC is also consistent with prior Commission direction. Specifically, the Commission previously directed that ITAAC for a program should not be necessary if the program and its implementation are fully described in the application and found to be acceptable by the NRC at the COL stage. Therefore, I approve the staff's recommendation to discontinue the use of the D-RAP ITAAC provided that the program is fully described in the application.

**Entered in STARS**

Yes  ✓   
No

  
\_\_\_\_\_  
**Signature**  
8/1/19  
\_\_\_\_\_  
**Date**