

COMPLETED REGULATORY REVIEW GROUP (RRG) IMPLEMENTATION PLAN ITEMS
(As of 1/96)

Topic Area	Issue	Completed Action(s) (* completed since last report)
2*	10 CFR Part 21 rule change to revise definition of commercial grade and dedication	Issued final rule via 60 FR 48369, 9/19/95.
5*	Guidance allowing changes to emergency preparedness plans without NRC approval	Determined that implementation of 10 CFR 50.54(q) is adequate and additional guidance is not warranted.
6	Policy statement on planning basis for emergency responses to nuclear power reactor accidents	Policy statement withdrawn via 60 FR 4071, 1/20/95.
8*	Definition of "current licensing basis" (CLB)	Determined that the definition of CLB in 10 CFR Part 54 is adequate and should not be changed nor added to 10 CFR Part 50.
9*	Scope and depth of the term "design basis"	Determined that the term "design basis" is adequate as used in the regulations and should not be changed.
10*	Add definition of "material alteration" to 10 CFR Part 50	Terminated rulemaking in a memorandum from the EDO to the Commission dated 5/10/95 based on lack of need and prioritization effort.
11*	Responsiveness to cost-beneficial licensing actions (CBLAs)	Provided four semiannual status reports to the EDO, the last two on 7/5/95 and 12/28/95, and determined that the program to respond to CBLA requests is sufficiently institutionalized in NRR. Issuance of a final semiannual report (in 6/96) will be tracked through the Work Item Tracking System (WITS).
12*	Identify regulatory vehicles that are burdensome and use flexibility already available	Held public workshop on 4/13/95 and determined that the NRR program to respond to CBLA requests is sufficiently institutionalized.
13*	10 CFR 50.54(p) security plan changes	Determined that rule changes are not necessary and issued Generic Letter (GL) 95-08 on 10/31/95.
15	Eliminate submittal of quarterly security logs (10 CFR 73.71(c)(2))	Final rule changes published via 60 FR 13615, 3/14/95.
16*	Revise 10 CFR Part 73	Determined that resources required to make 10 CFR Part 73 more performance based are prohibitive. Key sections have already been revised and a complete revision is not warranted.
17	Policy statement on nuclear power plant access authorization program	Policy statement withdrawn via 60 FR 4071, 1/20/95.
21	Policy statement on fitness for duty	Policy statement withdrawn via 60 FR 4071, 1/20/95.
24	Fire protection guidance	Issued Supplement 1 to GL 86-10 on 3/25/94.

COMPLETED RRG IMPLEMENTATION PLAN ITEMS (As of 1/96), cont'd.

Topic Area	Issue	Completed Action(s) (* completed since last report)
26	Agency plan for probabilistic risk assessment (PRA)	Implementation plan sent to the Commission on 8/19/94 (SECY-94-219).
34	Inservice testing (IST) guidelines	Issued NUREG-1482 and Supplement 1 to GL 89-04 on 4/4/95.
35*	Inspection Procedure 73756	Issued revised Inspection Procedure 73756 on 7/27/95 to reflect issuance of the latest IST guidelines.
36	Revise Regulatory Guides (RGs) 1.84, 1.85, and 1.147	RGs are updated on an annual basis. No additional action is needed.
39	Prioritization in the Regulatory Agenda	The Regulatory Agenda has been revised to present rulemakings by priority.
40	Schedules in the Regulatory Agenda	The Regulatory Agenda now includes complete schedules for all rulemaking activities.
41	Abstract information in the Regulatory Agenda	The Regulatory Agenda has been revised to present abstract information.
43	Reassess need for old or delayed rulemakings	RES is periodically reassessing rulemakings that have not had resources applied for long periods of time.
44	Marginal-to-Safety Program	Submitted SECY-94-090, dated 3/31/94, to refocus the Marginal-to-Safety Program.
45	Modify past practice of using policy statements, RGs, or other documents as legal requirements	Reviewed office procedures and reminded office personnel about inappropriate use of policy statements, regulatory guides, etc.
46	Policy statement on maintenance	Policy statement withdrawn via 60 FR 4071, 1/20/95.
47	Policy statement on below regulatory concern	Policy statement withdrawn via 58 FR 44610, 8/24/93.
48	Policy statement on information flow	Policy statement withdrawn via 60 FR 4071, 1/20/95.
49	Policy statement on training and qualification of nuclear power plant personnel	Policy statement withdrawn via 60 FR 4071, 1/20/95.
50	Policy statement on engineering expertise	Evaluated the policy statement and concluded that it should be retained.
52	Policy statement on conduct of nuclear power plant operations	Found no indication that this policy statement has been used as a requirement.
53	Policy statement on education for senior reactor operators and shift supervisors at nuclear power plants	Staff decided on 11/25/94 that this policy statement should not be withdrawn and advised the Commission of this decision in 12/94.

COMPLETED RRG IMPLEMENTATION PLAN ITEMS (As of 1/96), cont'd.

Topic Area	Issue	Completed Action(s) (* completed since last report)
56	Allow line-item improvements for improved Standard Technical Specifications	Policy Statement on Technical Specifications dated 7/22/93 stated that line-item improvements would be accepted by NRC. No additional action is required.
57	Delete unnecessary reporting requirements in technical specifications	Policy Statement on Technical Specifications dated 7/22/93 stated that line-item improvements would be accepted by NRC. No additional action is required.
61	Update rule addressing office space for resident inspectors (10 CFR 50.70(b)(2))	No problems exist with implementation, so rule changes are not necessary.
62	Have different generic communication types for requesting information from and for providing information to licensees	Administrative letter format was established and used in 1993 and 1994 to issue 22 documents. Staff reviewed use and found the format an effective means of sending information to licensees.
63	Revise 10 CFR 50.54(f)	Staff decided that this rule should not be revised.
64	Eliminate inconsistency in wording between 10 CFR 50.54(a)(3) and newly revised 50.71 regarding frequency of reporting QA program changes	Final rule changes published via 58 FR 45243, 8/27/93.
65	Revise 10 CFR 50.7 on whistleblower protection to reflect Energy Policy Act of 1992	Final rule changes published via 58 FR 52406, 10/8/93.
66	Allow application of graded approach to review functions of licensee onsite or offsite review committees	Addressed by ongoing initiative within the Improved Standard Technical Specification Program. No additional action is required.
A	Rulemaking process takes too long	New management directive, MD 6.3, to implement improvements to accelerate the rulemaking process was approved on 1/26/95 for publication.
C	Supervisory oversight of draft generic communications	Periodically conducted supervisory reviews and incorporated them into office procedures.
D	Revise 10 CFR 20.1703(a)(3)(v) regarding frequency of medical examinations for use of respiratory protection equipment	Final rule changes published via 60 FR 7900, 2/10/95.

ONGOING RRG IMPLEMENTATION PLAN ITEMS (As of 1/96)

Work to complete 29 RRG implementation plan items is ongoing. A few of these items (Topic Areas 14, 58, and B) are expected to be completed within the next few months and the majority of the others are estimated to be approximately 50 percent complete. Completion of the remaining items can be assured through broader agency programs and tracking systems. Therefore, continuing to provide status on the RRG implementation plan in a separate, periodic report to the Commission is no longer considered to be necessary. The RRG/CBLA Programs Staff will ensure that appropriate NRC line organizations are informed of their responsibility to consider and resolve remaining RRG items and these transfers will be clearly documented. The responsibility to periodically inform the Commission of policy issues that may arise and to provide updates on significant efforts as notable progress occurs will also be transferred to the line organizations.

Several of the remaining RRG items involve rulemakings or rulemaking petitions. At the NRC, rulemaking activities have several levels of oversight through various reporting vehicles that provide high-level visibility and broad, management oversight of rulemaking planning and accomplishment. The RRG-related rulemakings and rulemaking petitions are included in all or several of these vehicles. In addition, rulemakings for which NRR has the lead or provides significant support, or for which NRR does not provide support but is the user, are included in the "Director's Monthly Status Report." The other reporting vehicles for rulemakings are:

- ! NRC's semiannual status input to Congress on all NRC's active rulemakings for the government-wide "Unified Agenda of Federal Regulations." NRC provides input as of April and October of each year. The unified agenda is published in the Federal Register.
- ! NUREG-0936, "NRC Regulatory Agenda." This NUREG provides status information on all rulemaking activities under way at

ONGOING RRG IMPLEMENTATION PLAN ITEMS (As of 1/96), cont'd.

the NRC, including final rules, proposed rules, advance notices of proposed rulemaking, unpublished rules, and rulemaking petitions. It is issued semiannually with information current as of June and December of each year.

- ! "Rulemaking Activity Plan Control Document." This document is updated at 6-month intervals for all rulemakings under the control of the EDO. The update process causes review and prioritization of the included rulemaking efforts on a continuing basis. Prioritization is based on a safety benefit and cost recommendation by the responsible program office staff.

NRR's tool for maintaining management oversight of a variety of generic activities (i.e., not related to specific nuclear power plant licenses) and their resource implications is the "Director's Monthly Status Report." This report currently covers many of the remaining RRG items. While the report's details vary depending on the type of generic activity, its overall purpose is to provide management with concise information on the status of progress on all ongoing generic activities related to power reactors for which NRR has lead responsibility or provides support, or is a user. The staff has recently begun making portions of this report available to the public. NRR staff will be adding some new action plans to this report as indicated elsewhere in this status report.

Some items that do not warrant inclusion in any of the above reports, can be tracked to completion through the Work Item Tracking System (WITS). A few non-rulemaking items are nearly resolved but are not tracked separately outside of RRG status reporting. Rather than adding them to one of the other tracking systems, management will closely monitor their completion.

The following table lists each of the ongoing RRG items and summarizes the method by which the staff will continue to monitor and resolve them:

ONGOING RRG IMPLEMENTATION PLAN ITEMS (As of 1/96), cont'd.

Topic Area	Issue	Remarks
1	Graded quality assurance (QA)	NRR's ongoing efforts are detailed in an action plan which has been added to NRR's "Director's Monthly Status Report," under the PRA Implementation Plan (SECY-94-219 and SECY-95-079) activities.
3	QA program changes (10 CFR 50.54(a))	An NEI petition addressing this item is under staff evaluation. Disposition of the petition is currently tracked in the "NRC Regulatory Agenda" (NUREG-0936). The NRR staff will assess the need for guidance on 10 CFR 50.54(a) after disposition of the NEI petition and as part of the action plan on graded QA (Topic Area 1). An action plan will be developed if additional work is necessary and it will be included in NRR's "Director's Monthly Status Report."
4	Revise RGs addressing QA	The NRR staff will determine the need to consolidate/revise the RGs as part of the action plan on graded QA (Topic Area 1). An action plan will be developed if additional work is necessary and it will be included in NRR's "Director's Monthly Status Report."
7	Establish change process for commitments	SECY paper addressing the process was forwarded to the Commission on 12/20/95 (SECY-95-300). A letter to NEI advising it that its "Guideline for Managing NRC Commitments" is acceptable for use by licensees was transmitted on 1/24/96. The NRR staff will evaluate the effectiveness of the NEI guidance and reassess the need for rulemaking in this area after experience has been gained with implementation.
14	Allowable outage times (AOTs) for security systems	The GL addressing this item is expected to be issued in 1/96. Completion of the GL and the staff effort to evaluate other areas in which AOTs are appropriate for security systems are currently tracked in NRR's "Director's Monthly Status Report."
18	Extend audit frequency of fitness-for-duty (FFD) programs	This item is being handled in conjunction with the 10 CFR Part 26 rulemaking, which is tracked in the "NRC Regulatory Agenda" (NUREG-0936). The rulemaking and completion of this RRG item are also tracked in NRR's "Director's Monthly Status Report." The final rule expected to be issued by the end of 12/96.
19	Allow annual submittal of FFD performance data	This item is being handled in conjunction with the 10 CFR Part 26 rulemaking, which is tracked in the "NRC Regulatory Agenda" (NUREG-0936). The rulemaking and completion of this RRG item are also tracked in NRR's "Director's Monthly Status Report." The final rule is expected to be issued by the end of 12/96.

ONGOING RRG IMPLEMENTATION PLAN ITEMS (As of 1/96), cont'd.

Topic Area	Issue	Remarks
20	Guidance on behavioral observation under FFD programs	This item is dependent on the content of the proposed 10 CFR Part 26 rulemaking package that is published. The development of the information notice (or other appropriate guidance) will be considered by NRR staff after the draft 10 CFR Part 26 rulemaking package is complete. If development of additional guidance is warranted, the staff will develop an action plan and include it in NRR's "Director's Monthly Status Report."
22	Use of graded QA for fire prevention and protection systems	The NRR staff will determine the need to revise its guidance on the application of graded QA for fire prevention and protection systems as part of the action plan on graded QA (Topic Area 1). An action plan will be developed if additional work is necessary and it will be included in NRR's "Director's Monthly Status Report."
23	Establish a change process for fire protection plans in 10 CFR 50.54	NRR will consider this item in conjunction with the effort to make the fire protection regulations risk based and performance oriented (Topic Area 25). If a new rule or new guidance on a change process is determined to be necessary, the staff will develop an action plan which will be included in NRR's "Director's Monthly Status Report."
25	Revise fire protection regulations to make them more performance based	An NEI petition addressing this item is under staff evaluation. The staff is also considering other options for revising the fire protection requirements. Disposition of the petition is currently tracked in the "NRC Regulatory Agenda" (NUREG-0936). The rulemaking and completion of this RRG item are tracked in NRR's "Director's Monthly Status Report." A schedule for this work is expected to be developed by RES in the near future.
27	Develop ground rules for PRA use	SECY-95-280 outlines the overall process by which PRA will be factored into reactor regulatory activities and is, in turn, defined by the PRA Implementation Plan (SECY-94-219 and SECY-95-079), which is currently tracked in NRR's "Director's Monthly Status Report."
28	Develop PRA handbook	A handbook for use in review of proposed changes to Technical Specifications (NUREG/CR-6141) was issued in 12/94. The need for application handbooks for other uses will be considered in the action plans for specific PRA application studies, such as those for graded QA, inservice inspection (ISI), and IST, although other regulatory instruments (e.g., RGs and SRPs) may be more appropriate. As they are finalized, these action plans will be included in NRR's "Director's Monthly Status Report."

ONGOING RRG IMPLEMENTATION PLAN ITEMS (As of 1/96), cont'd.

Topic Area	Issue	Remarks
29	Use pilot studies when expanding regulatory uses of PRA	The action plans under development for specific PRA applications (see Topic Area 28) that are being explored all include pilots. Once finalized, these action plans will be included in NRR's "Director's Monthly Status Report."
30	Develop guidelines for use of PRA in 10 CFR 50.59 reviews	This item will be considered as part of Topic Area 54, Task 2.
31	Advise staff and public of availability of integrated approach to licensing actions so that a number of issues may be proposed in license amendment requests if the issues are safety neutral	SECY-95-280 outlines the overall process by which PRA will be factored into reactor regulatory activities and is, in turn, defined by the PRA Implementation Plan (SECY-94-219 and SECY-95-079), which is currently tracked in NRR's "Director's Monthly Status Report." NRR is responsible for assuring that this item is considered in the process of developing guidance on PRA uses.
32	Develop criteria for credit for redundancy	This item is being addressed under the PRA Implementation Plan (SECY-94-219 and SECY-95-079), Activity 1.2(8) on technical specifications, for which an action plan is under development and will be tracked in NRR's "Director's Monthly Status Report."
33	Develop risk-based approaches to ISI and IST	The NRR staff is developing detailed action plans for completing this item under the PRA Implementation Plan (SECY-94-219 and SECY-95-079), which, once finalized, will be included in NRR's "Director's Monthly Status Report."
37	Revise 10 CFR 50.82 on decommissioning	This RRG item is being addressed via the rulemaking on applicability of 10 CFR Part 50 to decommissioning plants and is currently tracked in the "NRC Regulatory Agenda" (NUREG-0936). The rulemaking is also tracked in NRR's "Director's Monthly Status Report." The final rule is expected to be issued by 5/96.
38	Revise RG 1.86 on decommissioning plans	The NRR staff is developing an action plan for developing and issuing new guidance addressing the type of information to be included in the post-shutdown activities report (PSDAR), which will be included in NRR's "Director's Monthly Status Report."
42	Guidance on scope and detail of rulemaking petitions under 10 CFR 2.802	Information on the status of this rulemaking is included in the "NRC Regulatory Agenda" (NUREG-0936). On 12/5/95, the staff informed the Commission of an alternative to changing the rule, i.e., withdrawal of the rulemaking and development of guidance. The schedule for completing this revised course of action is being prepared. RES is responsible for any follow-on work under the revised course of action.
51	Policy statement on nuclear power plant staff working hours	NRR is responsible for completing the GL addressing this item, which is currently tracked in NRR's "Director's Monthly Status Report." The final GL is scheduled to be issued in 12/96.

ONGOING RRG IMPLEMENTATION PLAN ITEMS (As of 1/96), cont'd.

Topic Area	Issue	Remarks
54	Control of material removed from technical specifications	The staff is preparing interim, internal guidance on 10 CFR 50.59. In the next few months, the staff expects to complete its evaluation and develop an action plan for follow-on work addressing the implementation of 10 CFR 50.59 and related issues, such as the need to develop regulatory guidance. The schedule for completing this item will be changed based on the outcome and course of action to be taken. The action plan will be added to NRR's "Director's Monthly Status Report" and would also be addressed in the "NRC Regulatory Agenda" (NUREG-0936) if rulemaking is indicated.
55	Improve review of core reload analyses	The GL addressing this item is expected to be issued in 9/96. This effort is currently tracked in NRR's "Director's Monthly Status Report."
58	Reduce scope of monthly operating report	The GL addressing this item is expected to be issued in 3/96. This effort is currently tracked in NRR's "Director's Monthly Status Report."
59	Evaluate need and frequency for all reporting requirements applicable to power reactor licensees	Recommendations are expected to be made by the review panel by 3/96. Completion of this phase of the effort is being closely monitored by NRR management. Rule changes proposed as a result of the staff's evaluation of reporting requirements will be approved and prioritized by the EDO/Commission before work begins and included in the "NRC Regulatory Agenda" (NUREG-0936).
60	Decrease NRC's direct inspection effort at nuclear power plants	The process of enhancing the use of PRA insights in the inspection process is being developed in more detail and will be reflected in updates to the PRA Implementation Plan. These activities will be considered in the staff's efforts to improve the distribution of inspection resources. NRR management will continue to monitor the progress being made to reduce NRC's direct inspection effort.
B	Guidance on use of onsite security force to meet staffing requirements of 10 CFR Part 73	This item is being handled in conjunction with Topic Area 14. The GL addressing this item is expected to be issued in 1/96 and is currently tracked in NRR's "Director's Monthly Status Report."
E	Revise RGs to be consistent with revised 10 CFR Part 20	The final versions of the revised RGs that will complete this item are expected to be completed by early to mid-1996. RES is responsible for completion of this item.

REGULATORY REVIEW GROUP IMPLEMENTATION PLAN

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
<p>QUALITY ASSURANCE</p> <p>1</p>	<p>Graded Quality Assurance</p> <p>2.3.13*</p> <p>4.4.6*</p> <p>4.10.1a*</p> <p>(* Refer to RRG report sections)</p>	<p>Guidance needed to address use of graded QA.</p>	<p>Original Action Plan</p> <p>1. Public meeting with NUMARC working group on 12/16/93 concerning specific action plan.</p> <p>2. Develop staff guidance in parallel with industry efforts.</p> <p>3. Initiate pilot program.</p> <p>4. Issue/revise (draft) regulatory guides (see Topic Area 4).</p> <p>Revised Action Plan (4/95)</p> <p>1. Public meeting with NEI (formerly NUMARC) working group on 12/16/93 on specific action plan.</p> <p>2. Interact with NEI as necessary.</p> <p>3. Develop inspection/evaluation guidance to review graded QA programs.</p> <p>4. Cooperative effort with volunteer licensees to develop implementation methodology.</p> <p>(continued on next page)</p>	<p>1</p>	<p>NRR</p>	<p>1/94C</p> <p>7/94 10/94</p> <p>11/94</p> <p>7/95</p> <p>Revised (4/95) (1/96) 1/94C</p> <p>Ongoing</p> <p>5/95 1/96C</p> <p>9/95 Ongoing</p>	<p>ONGOING</p> <p>Background</p> <p>Guidance on graded QA acceptable to NRC and NEI was not developed by 7/94 due to differences in approach. As a result, the pilot program effort was not initiated by 11/94. In a 12/21/94 letter, NEI described a new approach for implementing performance-based QA, and has encouraged licensees to use deterministic and probabilistic insights to grade their QA programs as permitted by Part 50, Appendix B. Additional information on these matters is in SECY-95-059 (3/10/95).</p> <p>Status</p> <p>Guidance for staff evaluation of graded QA programs was issued on 7/24/95 for internal NRC comment. The staff has addressed the internal comments and issued the guidance for staff use in final form in 1/96. The guidance is being used to evaluate three volunteer plants (Palo Verde, Grand Gulf, and South Texas) that are developing graded QA implementation methodologies.</p> <p>(continued on next page)</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
QUALITY ASSURANCE 1, cont'd.	Graded Quality Assurance		<p><u>Revised Action Plan (4/95), cont'd.</u></p> <p>5. Issue draft staff implementation guidance for public comment.</p> <p>6. Issue final staff guidance.</p> <p>7. Issue other draft revised RGs to reflect graded QA (see Topic Area 4).</p>			<p><u>Revised (4/95) (1/96)</u></p> <p>12/95 12/96</p> <p>12/96 9/97</p> <p>See Topic Area 4.</p>	<p>(continued) Since NEI has encouraged licensees to implement graded QA, the staff needs to continue development of implementation guidance.</p> <p>Information on continuation NRR is responsible for resolving this item. The staff has prepared a detailed action plan which has been included in NRR's "Director's Monthly Status Report." The staff will update the Commission after this item is completed.</p>
QUALITY ASSURANCE 2	Revise Part 21 2.3.1	Revise definition of commercial grade and dedication.	<p>Original Action Plan</p> <p>1. Evaluate need for rulemaking to assure congruence between Part 21 and graded QA efforts.</p> <p>2. If rulemaking is necessary, schedule should be consistent with schedule for graded QA (Topic Area 1).</p> <p>Note: <u>Federal Register</u> notice requesting comments on NUMARC petition for rulemaking expired on 12/28/93.</p> <p><u>Revised Action Plan (4/95)</u></p> <p>1. Issue proposed rule.</p> <p>2. Issue final rule.</p>	1	RES	<p>5/94C</p> <p>10/94</p> <p><u>Revised (4/95) 10/94C</u></p> <p>7/95 9/95C</p>	<p><u>COMPLETED</u></p> <p>On 8/15/95 the staff received the Commission's SRM stating the Commission has no objection to publishing the final rule revising Part 21. The final rule was published on 9/19/95.</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
QUALITY ASSURANCE 3	10 CFR 50.54(a), Quality Assurance 2.3.9 3.3	Establish regulations as minimum standard -- allow changes to program without NRC approval as long as QA program meets regulations.	<p>Alternative Recommendation: Integrate any rulemaking with graded QA initiative (Topic Area 1).</p> <ol style="list-style-type: none"> 1. Meet with industry on issues specific to QA plans and changes to QA plans. 2. Develop draft industry guidelines or staff guidance that defines acceptance criteria that would permit plan changes without NRC review. 3. Assess need for rulemaking. 	1	NRR	<p><u>Revised (4/95)</u></p> <p>9/94 4/95 6/95 8/95C</p> <p>9/95 TBD</p> <p>TBD</p>	<p>ONGOING Background The initiation of work in Topic Area 3 is closely linked with the graded QA initiative. The rate of progress for graded QA has not achieved the target schedules (See Topic Area 1).</p> <p>NEI submitted a petition for rulemaking to change 10 CFR 50.54(a) on 6/8/95. NEI proposes that QA program changes that involve an unreviewed safety question or that result in a change to the Technical Specifications be reviewed by the NRC before implementation.</p> <p>Status NRC noticed receipt of the petition in the <u>Federal Register</u> on 9/14/95. The notice includes several questions for public response relating to the perceived need for the revision. The public comment period expired on 11/28/95. NRC staff met with NEI on 8/29/95 and 11/2/95 to discuss how 10 CFR 50.59 and the associated industry guideline (NSAC-125) would be applied to QA program changes. NEI provided recommended guidance in its 11/28/95 reply to the FR notice.</p> <p>(continued on next page)</p>

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QUALITY ASSURANCE 3, cont'd.	10 CFR 50.54(a), Quality Assurance						(continued) Information on continuation RES is responsible for the disposition of the NEI petition. The NRR staff will consider the need for guidance on 50.54(a) as part of the detailed action plan for graded QA following disposition of the NEI petition. A plan and schedule for developing and issuing 50.54(a) guidance will be prepared separately, as necessary, and included in NRR's "Director's Monthly Status Report."

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<p>QUALITY ASSURANCE</p> <p>4</p>	<p>Revise Regulatory Guides 1.26, 1.28, 1.29, 1.30, 1.33, 1.37, 1.38, and 1.39</p> <p>2.3.15b</p>	<p>Reduce the number of RGs that discuss NRC expectations for QA -- include NRC position on commercial grade dedication.</p>	<p>1. Revise Standard Review Plan (SRP) and reduce/revise draft RGs as appropriate. Issue draft.</p> <p>2. Publish final RGs.</p> <p>Note: Directly affected by plan to move to graded QA.</p>	<p>3</p>	<p>RES</p>	<p>Revised (4/95) 7/95 12/96</p> <p>7/96 9/97</p>	<p>ONGOING</p> <p>Background</p> <p>A large number of RGs address QA. Many licensees have committed to these RGs which, for the most part, endorse consensus standards that have now been superseded. The RRG suggested that concentrating the QA guidance in fewer RGs would improve the regulatory process.</p> <p>Status</p> <p>Based in part on resource constraints, revision of the SRP and RGs are awaiting the development of implementation guidance for graded QA (Topic Area 1).</p> <p>Information on continuation</p> <p>The NRR staff will consider the need for revising the SRP and reducing/revising the RGs addressing QA as part of the detailed action plan on graded QA. A detailed plan and schedule for revising the SRP/RGs will be developed separately, as necessary, and will be included in NRR's "Director's Monthly Status Report."</p>

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EMERGENCY PLANNING 5	10 CFR 50.54(q), Emergency Preparedness 2.3.9 3.3.4c	Establish regulations as minimum standard -- allow changes to plan without NRC approval as long as emergency plan meets regulations.	Alternative Recommendation: Defer action until experience has been gained with security and possibly QA.	NA	RES	6/96 11/95C	COMPLETED Background The staff deferred action until experience could be gained with 10 CFR 50.54(a) QA program changes (Topic Area 3) and 10 CFR 50.54(p) security plan changes (Topic Area 13). Status Based on the experience gained in developing the generic letter (GL) addressing 10 CFR 50.54(p), the staff has considered developing guidance to help licensees identify the types of changes they may make to emergency preparedness plans without prior NRC approval. NRC inspections in this area have noted no generic weaknesses in implementation and no problems have been identified by industry or the public. Based on the lack of need, the staff determined that preparation of the guidance is not a wise expenditure of resources, and has discontinued work in this area.
EMERGENCY PLANNING 6	Policy Statement on Planning Basis for Emergency Responses to Nuclear Power Reactor Accidents 2.3.11 3.3.4a	Withdraw -- 10 CFR 50.47 and Part 100 supersede the policy statement.	Publish <u>Federal Register</u> notice withdrawing policy statement on the grounds that the rule has superseded the necessity for it.	3	RES	6/94 9/94 1/95C	COMPLETED A <u>Federal Register</u> notice withdrawing this policy statement (and 5 others) was published on 1/20/95.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
<p>CURRENT LICENSING BASIS</p> <p>7</p>	<p>Define "Commitment" and Implement a Change Process for Commitments</p> <p>2.3.2 2.3.9</p>	<p>Propose rulemaking to define commitment and describe a change process for commitments in 10 CFR 50.54.</p>	<p>Alternative Recommendation:</p> <p>1. Either (a) endorse industry guidelines or (b) develop and promulgate staff guidance on what constitutes a commitment and the types of controls to be placed on changing commitments.</p> <p>2. Reassess the need to develop rulemaking after guidance is implemented.</p>	<p>1</p>	<p>NRR</p>	<p>Revised (4/95) (1/96)</p> <p>7/94 10/94 8/95 1/96C</p> <p>7/95 8/96 2/97</p>	<p>ONGOING Background</p> <p>A pilot program utilizing a draft NEI guideline defining the term "commitment" and implementing a change process for commitments was begun in 9/94. As a result of site visits to review implementation, the staff concluded that satisfactory results are achieved from implementing the NEI guidance.</p> <p>Status</p> <p>SECY-95-300, issued on 12/20/95, describes the staff position on management of commitments to NRC and the NEI guideline. A letter to NEI stating that the guideline is an acceptable method for licensees to follow for managing commitments was issued on 1/24/96, completing Task 1. The delay was due to a longer-than-anticipated coordination process.</p> <p>Information on continuation</p> <p>The NRR staff will evaluate the effectiveness of the NEI guidance and reassess the need for rulemaking after experience has been gained with implementation.</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
CURRENT LICENSING BASIS 8	Define "Current Licensing Basis" (CLB) 2.3.10e	In recognition of the rulemaking on Part 54, the definitions for current licensing basis should be consistently applied in Part 50 also.	<p>Original Action Plan Reexamine definition to modify as necessary and incorporate definition of CLB into both Part 50 and Part 54.</p> <p>Revised Action Plan (4/95) 1. Reexamine definition. 2. Publish draft rule changes. 3. Publish final rule changes.</p>	3	NRR	12/94 Revised (4/95) 9/95 7/95C 3/96 3/97	<p>COMPLETED</p> <p>Background Due to the interrelated nature of RRG Topic Areas 7 (commitment management) and 54 (conduct of 50.59 safety assessments and the reevaluation of 50.71(e) adequacy), the staff worked to ensure that any changes to the CLB definition would reflect any potential changes made in these other topic areas.</p> <p>Status In 7/95, the staff determined that the current definition of CLB (in Part 54) is adequate and should not be changed. Also, the staff determined that minimal, if any, benefit would be gained by including the current Part 54 definition of CLB in Part 50. Therefore, rulemaking activity on the issue will not be pursued.</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
CURRENT LICENSING BASIS 9	Clarify Scope and Depth of "Design Basis" 2.3.10f	Clarify the scope and depth of the term "design basis" as it is used in the regulations.	Alternative Recommendation: Consider need for changes to definition of design basis, as appropriate, that may arise from efforts on current licensing basis and change process for commitments.	3	NRR	12/94 <u>Revised (4/95)</u> 12/95 7/95C	COMPLETED Background Since the staff was working this item in conjunction with Topic Area 8, its completion was delayed along with that topic area. Status As part of its efforts in reviewing the definition of CLB (Topic Area 8) and commitment management (Topic Area 7), the staff reviewed the current definition of design basis contained in 10 CFR Part 50 and determined that modifying the definition is not necessary.
CURRENT LICENSING BASIS 10	Define "Material Alteration" 2.3.10a	Amend 10 CFR 50 to add a definition of "material alteration."	Propose rulemaking to add a definition of "material alteration" or revise sections of regulations which require a construction permit for alterations. Alternatively, document position in memorandum to EDO why rulemaking is not appropriate.	3	RES (was NRR)	12/95 5/95C	COMPLETED In a 5/10/95 memorandum, the staff informed the Commission that 19 rulemaking activities have been dropped due to lack of cost-benefit. This proposed rulemaking was one of those dropped.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
COST BENEFICIAL LICENSING ACTIONS 11	Be Responsive to CBLAs 1.3.a 3.3.4e 3.3.5	The need for the staff to be responsive to licensee submittals that are safety neutral but have a primary aim of economic relief.	1. Continue to process CBLA requests. 2. Provide semiannual status reports to EDO.	1	NRR	Ongoing (Semi-annually) 6/94C 12/94C 7/95C 12/95C 6/96	COMPLETED Background NRR has been processing licensees' CBLA requests since early 1994 and has provided semiannual reports to the EDO. Status The third and fourth semiannual reports to the EDO were issued on 7/5/95 and 12/28/95, respectively. The staff has determined that the CBLA program is sufficiently institutionalized within NRC. NRR staff will continue to process CBLA requests and plans to provide a final semiannual report to the EDO in 6/96. The issuance of this report will be tracked by WITS.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
<p>COST BENEFICIAL LICENSING ACTIONS</p> <p>12</p>	<p>Identify Regulatory Vehicle and Use Flexibility</p> <p>1.3.2 3.3.4e 3.3.4k 3.3.4l 4.10.1e 4.10.1h</p>	<p>Each licensee should review and identify the regulatory vehicle that is the cause of unnecessary expenditures and aggressively pursue corrective action fully utilizing the flexibility already available.</p>	<p>1. CBLA and related efforts address this issue.</p> <p>2. Continue arranging and attending public meetings and industry workshops at which industry representatives and licensees can provide information and express individual views.</p>	1	NRR	<p>Ongoing</p> <p>Ongoing</p>	<p>COMPLETED</p> <p>Background</p> <p>The staff issued Administrative Letter 95-02, "Cost Beneficial Licensing Actions," on 2/23/95 to all licensees to provide additional information on the CBLA program. The letter included a section of questions and answers based on past meetings with licensees and the staff.</p> <p>Status</p> <p>A public workshop was held on 4/13/95 to further communicate the advantages of the CBLA program. The staff has continued to address licensees at industry workshops and in individual meetings as requested to clarify the information provided in Administrative Letter 95-02. In the future, the staff will continue to process CBLA submittals and meet with licensees at their request to discuss CBLA issues. The staff has determined that the CBLA program is sufficiently institutionalized within NRC.</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
SECURITY 13	10 CFR 50.54(p), Security 2.3.9 2.3.18d 3.3.4c	Establish regulations as minimum standard -- allow changes to plans without NRC approval as long as security plans meet regulations. Eliminate license conditions.	Alternative Recommendations (Revised 4/95): 1. Meet with industry on issues specific to security plans. 2. Develop draft industry guidelines or staff guidance that defines when a "decrease in effectiveness" occurs. Consider developing acceptance criteria that would permit plan changes without NRC review. Publish draft GL for public comments. 3. Publish final guidelines or staff guidance that defines when a "decrease in effectiveness" occurs. 4. Assess need for rulemaking.	1	NRR	<u>Revised (4/95)</u> 2/94C 6/94 9/94 4/95 6/95C 12/94 1/95 10/95C 6/95 5/96 9/95C	COMPLETED Background Extensive staff discussions were necessary in developing examples that could be used to define "decrease in security plan effectiveness." The staff decided to implement the RRG recommendation by issuing guidance in a GL. Status The draft GL was issued for public comment on 6/14/95. The final, GL 95-08, "10 CFR 50.54(p) Process for Changes to Security Plans Without Prior NRC Approval," was issued on 10/31/95. As a consequence of the extensive discussion on the content and format of the guidance leading to the development of the GL, the staff has already assessed the need for rulemaking (Task 4) and has determined rulemaking is not needed.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
SECURITY 16	Revise 10 CFR Part 73 2.3.18a	Make Part 73 more performance based.	Provide Commission paper with recommendation of feasibility of more performance-based Part 73. Note: Need to gain experience with current proposals for revisions to Part 73.	3	NRR	4/96	COMPLETED Background This item was previously listed as inactive and was to be worked on as experience was gained with the implementation of recent changes based on other RRG items, resolution of a differing professional view, and other staff initiatives. Status NRR senior management reevaluated the status of this item and determined that the resources required to revise Part 73 to recast the prescriptive sections of the rules into a more performance-based approach are prohibitive. In addition, since work has already been undertaken to revise those sections that have resulted in inconsistencies in implementation, the staff has concluded that further revision is not warranted at this time.
SECURITY 17	Policy Statement on Nuclear Power Plant Access Authorization Program 2.3.11	Withdraw policy statement -- 10 CFR 73.56 supersedes it.	See Topic Area 6.	3	RES	6/94 1/95C	COMPLETED A <u>Federal Register</u> notice withdrawing this policy statement (and 5 others) was published on 1/20/95.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
FITNESS FOR DUTY 18	Fitness-For-Duty (FFD) Audit Frequency 2.3.5b	Extend audit frequency based on performance from one year up to 3 years.	Develop performance-based 10 CFR 26.80(a) to allow an extended audit frequency up to 3 years based on past performance.	2	NRR	Concurrent with ongoing fitness-for-duty rulemaking package (See Topic Area 19)	<u>ONGOING</u> Topic Areas 18 and 19 were combined with the general fitness-for-duty rulemaking package to increase staff efficiency. See status and information on continuation for Topic Area 19.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
FITNESS FOR DUTY 19	Fitness-For-Duty Performance Data Submittal 2.3.5a 2.3.16b	Allow annual submittal of fitness-for-duty performance data instead of semiannual submittals.	<ol style="list-style-type: none"> 1. Publish proposed rule to allow annual submittal of performance data (included in fitness-for-duty lessons-learned package). 2. Publish final rule. 	2	NRR	Revised (4/95) (1/96) 6/94 5/95 12/95 TBD 1/95 4/96 12/96	<p>ONGOING</p> <p>Background For staff efficiency, Topic Areas 18 and 19 have been subsumed as a small part of the Part 26 rulemaking. The schedule for publishing the proposed FFD rule has been delayed several times because of its size and complexity.</p> <p>Status The schedule for completing Topic Areas 18 and 19 has been extended 8 months to 12/96 to reflect the additional time needed to process the rulemaking. The new draft proposed rule was forwarded to the Commission on 10/31/95 (SECY-95-262) and was expected to be issued for public comment in 12/95. This is on hold, however, pending the completion of Commission review of SECY-95-262.</p> <p>Information on continuation Topic Areas 18 and 19 are being addressed under the general FFD rulemaking, for which NRR is responsible to complete. The status of this rulemaking is provided in the "NRC Regulatory Agenda" and is item is being tracked in NRR's "Director's Monthly Status Report."</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
FITNESS FOR DUTY 20	Information Notice on Fitness For Duty 2.3.5c	Issue guidance discussing the behavioral observation aspect of fitness for duty.	Evaluate need for information notice associated with fitness-for-duty lessons-learned package.	3	NRR	<u>Revised (1/96)</u> 6/95 TBD	ONGOING Background The need for an information notice (IN) is dependent on the eventual outcome of the draft Part 26 rulemaking package (see Topic Areas 18 and 19, which has been delayed several times because of its size and complexity. Status The schedule for completing Topic Area 20 has been extended to reflect delays in the Part 26 rulemaking. Information on continuation NRR is responsible for completing this item. The staff will consider the need for an IN in this area once the draft Part 26 rulemaking package is nearly complete. The staff expected to publish the draft, revised rule in 12/95, but this is on hold pending Commission review of SECY-95-262. If additional guidance is needed, the staff will develop an action plan and a schedule, as necessary, that will be included in NRR's "Director's Monthly Status Report."
FITNESS FOR DUTY 21	Policy Statement on Fitness For Duty 2.3.11	Withdraw policy statement -- 10 CFR Part 26 supersedes it.	See Topic Area 6.	3	RES	6/94 9/94 1/95C	COMPLETED A <u>Federal Register</u> notice withdrawing this policy statement (and 5 others) was published on 1/20/95.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
FIRE PROTECTION 22	Fire Protection Quality Assurance Program 2.3.14	Endorse continued licensee use of QA in a graded manner for fire prevention and protection systems.	Consider as follow-on to reflect revised implementation of graded QA (Topic Area 1).	2	NRR	Action deferred until graded QA issue is resolved.	<p>ONGOING</p> <p>Background This item was previously listed as inactive and was to be worked on once the issues related to the graded QA initiative (Topic Area 1) were resolved.</p> <p>Status NRR management will continue to monitor the development of implementation guidance for graded QA and reevaluate the status of this item.</p> <p>Information on continuation NRR is responsible for resolving this item, which will be considered as part of the detailed action plan for graded QA (Topic Area 1).</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
<p>FIRE PROTECTION</p> <p>23</p>	<p>Add Section to 10 CFR 50.54, Fire Protection</p> <p>2.3.9 3.3.4c 3.3.4h 3.3.4i</p>	<p>Establish regulations as minimum standard -- allow changes to plan without NRC approval as long as fire protection plan meets regulations.</p> <p>Eliminate license condition.</p>	<p>Alternative Recommendation: Defer action until experience has been gained with security and, possibly, with quality assurance.</p>	<p>NA</p>	<p>NRR (see Status)</p>	<p>See Topic Area 22.</p>	<p><u>ONGOING</u> Background This item was previously listed as inactive. The original implementation plan did not specify the lead office or target schedule. NRR assumed the lead for this topic area and was to determine a target schedule based on the experience gained with security and QA (Topic Areas 13 and 3, respectively).</p> <p>Status The staff is currently considering options for revising NRC fire protection requirements. However, it will consider the need for a new rule or new guidance related to changes to fire protection plans as part of the rulemaking process.</p> <p>Information on continuation NRR is responsible for resolving this item. If a new rule or guidance is needed, the staff will develop an action plan and schedule, as necessary, which will be included in NRR's "Director's Monthly Status Report."</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
FIRE PROTECTION 24	Fire Protection Guidance 2.3.4a, b	Revise the regulatory guidance, including inspection procedures, to clarify that other alternative methods of compliance (other than that specified in various national fire codes and standards) can be developed and be acceptable.	<ol style="list-style-type: none"> 1. Publish draft supplement to GL 86-10 on fire protection matters. 2. Publish final supplement to GL. <p>Note: Existing staff guidance documents (SRP) indicate that alternative approaches can be acceptable.</p>	NA	NRR	7/93C 3/94C	COMPLETED Supplement 1 to GL 86-10 was issued on 3/25/94. In addition, existing staff guidance documents (SRP) indicate that alternative approaches can be acceptable. No further action is necessary.
FIRE PROTECTION 25	Fire Protection Rules 2.3.4c	Revise the existing regulations for fire protection to make them performance based.	<ol style="list-style-type: none"> 1. Publish proposed rule to revise the existing requirements for fire protection to make them performance-based requirements. 2. Publish final rule. <p>Note: Industry is considering a proposal to revise Appendix R to be performance based.</p>	NA	RES	4/95 Revised (4/95) TBD 8/96 TBD	<p>ONGOING Background</p> <p>On 2/2/95, NEI submitted a petition for rulemaking that would provide an alternative to 10 CFR Part 50, Appendix R. The staff has also been considering other options for revising NRC fire protection requirements.</p> <p>Status</p> <p>The NEI petition was published for public comment on 6/6/95. The notice included staff questions related to the merits of the proposal. The public comment period ended on 9/29/95. A schedule for rulemaking is expected to be developed in the near future.</p> <p>Information on continuation</p> <p>RES is responsible for resolving this item, which is being tracked in the "NRC Regulatory Agenda."</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
PRA 26	Agency Plan for PRA 4.9 4.10.g 4.10.1i	Plan needed to address research, development, implementation, and use of PRA for a consistent approach and use of resources.	1. Offices to develop an implementation plan that integrates PRA Working Group and RRG recommendations. 2. Implementation plan to be reviewed at next Senior Management Meeting and balance of the schedule to be developed. 3. Send implementation plan to Commission.	1	NRR RES AEOD NMSS	Complete 1/94C 2/94 8/94C	COMPLETED SECY-94-219 was issued on 8/19/94.
PRA 27	Ground Rules for PRA Use 1.3.4 4.3 4.4.5 4.5.2 4.6	Develop guidance on content of submittals, acceptable PRA methods, and decision criteria.	Endorse industry guidance or develop staff guidance separately and determine whether staff guidance should be part of the handbook for PRA.	1	NRR	5/96* *Schedule date is from SECY-95-079.	ONGOING Information on continuation SECY-95-280 (11/27/95) outlines the overall process by which PRA will be factored into reactor regulatory activities. The PRA Implementation Plan (SECY-94-219 and SECY-95-079) defines the staff's efforts to convert the conceptual structure into practical guidance for target applications. The PRA Implementation Plan is updated annually, with the next update expected to be issued to the Commission by 4/96. PRA Implementation Plan activities are tracked in NRR's "Director's Monthly Status Report."

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
PRA 28	Handbook for PRA 4.9.3 4.10.1i	Identify methods for optimizing Technical Specifications using PRA techniques or for using PRA in other plant-specific applications.	1. Complete handbook for use on technical specification optimization and AOTs. 2. Develop other handbooks for other uses (see Topic Areas 30, 31, and 32 for potential candidates and schedules).	1	RES	7/94 11/94 12/94C 6/96 9/96 As per action plans for other uses	ONGOING Background A handbook (NUREG/CR-6141) on risk-informed TS was published in 3/95. Information on continuation SECY-95-280 (11/27/95) outlines the overall process by which PRA will be factored into reactor regulatory activities. The PRA Implementation Plan (SECY-94-219 and SECY-95-079), which is updated annually, defines the staff's efforts to convert the conceptual structure into practical guidance, such as the development of handbooks for target applications. Handbooks on other PRA implementation areas may be considered as part of the action plans for specific PRA applications. However, other regulatory instruments, such as RGs and SRPs, may be more appropriate for providing guidance on use and review of PRA methods for specific applications.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
PRA 29	Pilot Program for PRA 4.2 4.8 4.9 4.10.1d	Use pilot studies when expanding uses of PRA into regulatory areas where PRA has not been used to date.	Select and implement pilot programs.	1	Office dependent	9/97* *Schedule date is from SECY-95-079.	ONGOING Information on continuation Several specific applications of PRA are being explored as part of the PRA Implementation Plan (SECY-94-219 and SECY-95-079), which the staff updates annually. Most of these include a pilot study. Action plans for pilot activities are under development and will be tracked in NRR's "Director's Monthly Status Report."
PRA 30	Develop Guidelines for Use of PRA in 10 CFR 50.59 2.3.19 4.5 4.10.1b	PRA should be considered in improving licensees' reviews for 10 CFR 50.59 -- guidance needed.	Consider PRA as part of the Implementation Plan.	1	NRR	12/96* *Schedule date is from SECY-95-079.	ONGOING Information on continuation This RRG topic will be considered as part of Topic Area 54, Task 2.
PRA 31	Multiple Actions if Safety Neutral 2.3.17b	Recognize and advise the staff and public of the availability of an integral approach to licensing actions so that a number of issues may be proposed in a license amendment request if the level of safety remains the same.	Consider as part of the Implementation Plan. Note: Staff has used an integrated approach in certain applications.	1	NRR	9/96* *Schedule date is from SECY-95-079.	ONGOING Information on continuation Recognition that licensing actions can be assessed and justified based on integrated risk-informed assessment is the foundation of the Commission policy statement on PRA (SECY-95-126). NRC's commitment to a risk-informed regulatory approach is further outlined in the PRA Implementation Plan (SECY-94-219 and SECY-95-079). NRR will assure that this item is considered in its studies of specific PRA applications.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
PRA 32	Criteria for Credit for Redundancy 3.3.4b	Evaluate the adequacy of existing guidance for reviewing design features that exceed regulatory requirements or provide alternative means of compliance. Such guidance should encourage flexibility in the Technical Specifications for those design features for which the review concludes that increased safety margin is provided.	Consider as part of the Implementation Plan.	1	NRR	3/96* *Schedule date is from SECY-95-079.	ONGOING Information on continuation This RRG topic is being addressed as part of Regulatory Activity 1.2(8) of the PRA Implementation Plan (SECY-94-219 and SECY-95-079), for which an action plan is under development and which will be tracked in NRR's "Director's Monthly Status Report."

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
INSERVICE TESTING 33	Revise ASME Code Requirements Based on Risk 2.3.7a	Continue to build consensus in code committees to revise the ASME codes governing inservice inspection and inservice testing based on risk-based techniques.	<p>Original Action Plan</p> <ol style="list-style-type: none"> 1. Continue staff participation in code activities. 2. Risk-based ISI program and code revisions nearing completion. 3. Risk-based IST program and code revisions under way. 4. Revise 10 CFR 50.55a after completion of code initiatives. <p>Revised Action Plan (4/95)</p> <ol style="list-style-type: none"> 1. Continue staff participation in code activities. 2. Complete pilot PRAs to identify risk importance: <ul style="list-style-type: none"> - PWRs - BWRs 3. Evaluate candidate risk-informed ISI programs: <ul style="list-style-type: none"> - PWRs - BWRs 4. Propose changes to rules for ISI of LWR components. 5. ASME to revise Section XI to incorporate risk-informed ISI programs. 6. Complete ASME grant project to develop guidelines for risk-informed IST. <p>(continued on next page)</p> <p>Note: Completion schedule of ASME activities not under NRC control.</p>	1	NRR, RES	<p>Ongoing</p> <p>12/94</p> <p>12/96</p> <p>TBD</p> <p>Revised (4/95)</p> <p>Ongoing</p> <p>6/94C 12/96</p> <p>12/96 6/97</p> <p>12/97</p> <p>12/98</p> <p>6/96</p>	<p>ONGOING Background</p> <p><u>ISI</u> - NRC has sponsored ASME Research work for several years. This work has produced a risk-ranking methodology that has been published (NUREG-6151). The PWR ISI pilot (Surry) was completed in 6/94 (NUREG/CR-6181). This pilot has indicated the need for improvement on the risk-informed ISI methodology. An industry pilot program on risk-informed ISI, sponsored by NEI, has been initiated which includes development of an ISI methodology and a pilot effort using that methodology. Risk-informed ISI code cases have been developed and are being reviewed by the ASME Code Section XI committee.</p> <p><u>IST</u> - Development and application of risk-informed techniques to IST programs by ASME Research has also been partially funded by the NRC. In advance of completion of the ASME guidance, the industry initiated a pilot program on risk-informed IST, sponsored by NEI, and two licensees have submitted IST program exemptions for staff review. The staff expects to begin a pilot effort with two licensees in late 1995. In addition, the</p> <p>(continued on next page)</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
INSERVICE TESTING 33, cont'd.	Revise ASME Code Requirements Based on Risk		<p>Revised Action Plan (4/95), cont'd.</p> <p>7. Industry to complete pilot risk-informed IST programs.</p> <p>8. ASME to revised OM Standards to incorporate risk-informed IST program.</p> <p>9. Initiate amendment to 50.55a.</p> <p>10. Publish draft 50.55a revisions for public comment.</p> <p>11. Publish final 50.55a revisions.</p>			<p>Revised (4/95)</p> <p>TBD</p> <p>12/97</p> <p>1/99</p> <p>12/99</p> <p>6/00</p>	<p>(continued) staff expects to review and approve the pilot risk-informed application in 1996. This pilot will provide information that will be useful to the staff in developing a risk-ranking methodology that is also anticipated to be completed in 1996.</p> <p>Status The goal of this item is NRC endorsement (10 CFR 50.55a) of ASME Code revisions incorporating risk-informed ISI and IST methods. Since it has little control of the ASME activities and schedules, however, the NRC staff is emphasizing an interim goal, development of application guides on ISI and IST through its involvement in the industry pilots under the PRA Implementation Plan (SECY-94-219 and SECY-95-079). These efforts are expected to lead to guidance for the industry that will result in the reduction of burden. The application guides and the results of the pilots will be an input to the development of regulatory guidance and/or revisions to the Code and possibly rule changes. The staff is working with NEI to establish separate, detailed action plans for ISI and IST pilot applications</p> <p>(continued on next page)</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
INSERVICE TESTING 33, cont'd.	Revise ASME Code Requirements Based on Risk						(continued) which will also include development of methodologies for risk-informed ISI and IST. Information on continuation This item will be completed as part of the regulatory activities of the PRA Implementation Plan. The staff is developing detailed action plans for completing this item, which will be tracked in NRR's "Director's Monthly Status Report."
INSERVICE TESTING 34	IST Guidelines 2.3.7b	Continue staff work on IST Program Guidelines to take advantage of generic approval for using the most recent addenda and editions of the ASME codes rather than outdated, older codes listed in staff safety evaluation reports.	1. Publish draft GL 89-04 (Supplement 1) and draft NUREG-1482. 2. Issue final GL and final NUREG-1482.	1	NRR	1/94C 9/94 10/94 4/95C	COMPLETED SECY-95-066 (3/16/95) forwarded the final GL supplement and NUREG-1482 for Commission review. Both documents were issued on 4/4/95.
INSERVICE TESTING 35	Revise Inspection Procedure 73756	Review and revise Inspection Procedure (IP) 73756 for applicability given issuance of Supplement to GL 89-04 and NUREG-1482.	Revise IP to include efforts and "lessons learned" from current temporary instruction on GL 89-04.	2	NRR	Revised (4/95) 9/94 5/95 7/95C	COMPLETED The revised IP was sent to the regions for comments on 5/5/95. Regional comments were incorporated and the final, revised IP was issued on 7/27/95.
INSERVICE TESTING 36	Revise Regulatory Guides 1.84, 1.85, and 1.147 2.3.15a	These guides delineate ASME Code acceptability and should be maintained current.	RGs currently updated on an annual basis -- last revisions to all guides was in summer 1993. Continue to follow current practices.	NA	RES	No action required.	COMPLETED

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
DECOMMISSIONING 37	OGC Opinion on Need to Revise 10 CFR 50.82 2.3.3a	Determine whether rule revision is needed to address what type of license is needed for decommissioning. Explore use of new possession-only license or renewal of original license for possession-only purposes.	<p><u>Original Action Plan (Revised 1/965)</u></p> <p>1. Publish proposed rule to define possession-only license clarify applicability of Part 50 to permanently shut down reactor facilities, define other terms important to decommissioning, modify 50.59 for decommissioning, and resolve remaining issues.</p> <p>2. Publish final rule.</p>	2	RES/NRR (was OGC)	<p><u>Revised (4/95 (1/96)</u></p> <p>6/94 4/95 7/95C</p> <p>3/95 10/95 5/96</p>	<p><u>ONGOING Background</u></p> <p>A proposed rule was submitted to the Commission (SECY-94-179) for review in 7/94. The Commission provided guidance to the staff on the proposed rulemaking in a 10/5/94 SRM. The staff revised the proposed rule to clarify applicability of Part 50 regulations to plants that have been permanently shut down, including 50.82. The revised, proposed rule was forwarded to the Commission on 3/6/95 (SECY-95-051).</p> <p><u>Status</u></p> <p>The Commission approved the revised, proposed rule in an 5/23/95 SRM. The proposed rule was issued for public comment on 7/20/95, 3 months later than previously scheduled. The public comment period ended on 10/18/95 and on 10/25/95 for the states. Due to the delay in publishing the draft rule, the 90-day comment period on the draft, and a longer-than-anticipated concurrence process, it is expected that the final rule will not be issued until 5/96.</p> <p><u>Information on continuation</u></p> <p>NRR provides significant support to RES, which is responsible for completing this rulemaking. The status of the rulemaking is reported in the "NRC Regulatory Agenda."</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
REGULATORY AGENDA 39	Prioritization in Regulatory Agenda 2.3.17e	Add a discussion to the Regulatory Agenda that describes how rulemakings are prioritized.	Reformat Regulatory Agenda to implement RRG recommendation.	3	ADM	6/94C	COMPLETED The "NRC Regulatory Agenda" (NUREG-0936) has been restructured to discuss how rulemakings are prioritized. The agenda present the major, active rulemakings in the first section, followed by a section that includes major rulemakings on indefinite hold, and a third section that includes minor administrative rulemakings.
REGULATORY AGENDA 40	Schedules in Regulatory Agenda 2.3.17f	Schedules should be included for all rulemaking in the regulatory agenda.	See Topic Area 39.	3	ADM	6/94C	COMPLETED Complete schedules will be included for all rulemaking activities.
REGULATORY AGENDA 41	Abstract Information in Regulatory Agenda 2.3.17g	Abstract information in Regulatory Agenda should be current.	See Topic Area 39.	3	ADM	6/94C	COMPLETED Abstract information in the "NRC Regulatory Agenda" (NUREG-0936) is being kept current. The changes described above for Topic Areas 39, 40, and 41 were reflected as of the 9/94 version of the regulatory agenda.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
RULEMAKING 42	Guidance on Petitions for Rulemaking 1.3.3 2.3.17c, d	Consider issuing guidance on scope and level of detail needed on petitions for rulemaking that reduce regulatory burden.	<ol style="list-style-type: none"> 1. Develop Commission paper that defines conceptual approach. Paper to distinguish between (a) requirements for petitions for rulemaking potentially affecting safety and (b) requirements for petitions for rulemaking that focus on reducing regulatory burden. The latter petitions are to be consistent with the requirements on the staff for proposed rulemaking. 2. Publish proposed rulemaking to revise requirements on scope and depth of petitions for rulemaking. 3. Publish final rule. 	2	RES	<p>Revised (4/95) (1/96) 6/94 3/94C</p> <p>11/94 3/95C</p> <p>7/95 TBD</p>	<p>ONGOING Background Proposed changes to 10 CFR 2.802 were published for public comment on 3/28/95. The comment period ended on 6/12/95. Extensive comments supporting the concept behind the proposed rulemaking were received, but they indicated that rulemaking was not the most appropriate regulatory vehicle for expediting the agency's handling of rulemaking petitions.</p> <p>Status The staff has reevaluated the need for the rule change. The staff has considered what alternative regulatory vehicles could be used to give guidance on the scope and level of detail of supporting information that should be submitted with petitions for rulemaking so that they can receive expeditious processing. The staff has developed a revised course of action whereby rulemaking would be terminated and guidance would be included in an appropriate guidance document. This information was communicated to the Commission in a 12/5/95 memorandum from the EDO. The schedule for completing this item is being revised (from 7/95).</p> <p style="text-align: right;">(continued on next page)</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
RULEMAKING 42, cont'd.	Guidance on Petitions for Rulemaking						(continued) Information on continuation The status of this rulemaking is reported in the "NRC Regulatory Agenda." RES is responsible for resolving all follow-on activities related to this item.
RULEMAKING 43	Reassess Need for Old or Delayed Rulemakings 2.3.17h	Provide a mechanism to reassess rulemakings that are low priority and are old.	1. Update guidance to document current practices for semiannual review of rulemakings and issuance of semiannual report to EDO. 2. Specify reassessment of rulemakings that have not had resources applied for a long period of time (2-3 years) to determine whether they are still needed.	3	RES	6/94 3/94C	COMPLETED RES began to periodically reassess rulemakings that have not had resources applied for long periods of time. The last two semiannual reports to the EDO indicated that several rulemakings had been terminated as a result of the reassessment. Rulemaking reassessment will be done for all future semiannual reports.
MARGINAL TO SAFETY 44	Marginal-to-Safety Program 2.3.17a	Marginal-to-Safety Program should focus on and be responsive to specific and detailed petitions that are performance based, eliminate burden, and are safety neutral. Consider renaming the program.	In Commission paper for Topic Area 42, also discuss redirecting marginal-to-safety program to focus on petitions for rulemaking and consider renaming program.	2	RES	6/94 3/94C	COMPLETED SECY-94-090 (3/31/94) refocused the Marginal-to-Safety Program as described in the RRG recommendations. A Commission SRM (5/18/94) approved the recommendations in SECY-94-090. The Marginal-to-Safety Program has also been made part of the "Regulatory Improvement Program" of SECY-94-090.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
POLICY STATEMENTS 45	Modify Past Practice of Using Policy Statements, Regulatory Guides, or Other Documents as Legal Requirements 3.3.4a 2.3.11	Eliminate past practice of using regulatory guidance documents such as policy statements, RGs, generic letters, and bulletins as legal requirements without going through "appropriate" disciplined process for establishing regulatory requirements.	1. Issue EDO memorandum to Office Directors that discusses proper use of communication vehicles and put it in the PDR. 2. Each office should revise its their procedures as necessary. Note: Some change to process has occurred through CRGR review and public comments on generic communications and policy statements.	3	DEDR Office dependent	1/94C 3/94 7/94C	COMPLETED EDO memorandum issued 1/28/94 requires each office to review and modify, as applicable, its internal operating procedures and practices to confirm that they do not either explicitly or implicitly sanction the use of inappropriate documents or methods to establish regulatory requirements. Affected offices have completed their reviews and re-sensitized their personnel, through staff meetings (NRR) or office director memorandum (NMSS), to the potential for inappropriately imposing new requirements.
POLICY STATEMENTS 46	Policy Statement on Maintenance 2.3.11	Withdraw policy statement -- 10 CFR 50.65 supersedes it.	See Topic Area 6.	3	RES	6/94 9/94 1/95C	COMPLETED A <u>Federal Register</u> notice withdrawing this policy statement (and 5 others) was published on 1/20/95.
POLICY STATEMENTS 47	Policy Statement on Below Regulatory Concern 2.3.11	Withdraw policy statement -- Congress has revoked it.	<u>Federal Register</u> notice published on 8/24/93 withdrawing policy statement.	NA		No further action required.	COMPLETED
POLICY STATEMENTS 48	Policy Statement on Information Flow 2.3.11	Withdraw policy statement -- it restates the requirements of 10 CFR 50.72 and 50.73.	See Topic Area 6.	3	RES	6/94 9/94 1/95C	COMPLETED A <u>Federal Register</u> notice withdrawing this policy statement (and 5 others) was published on 1/20/95.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
TRAINING and STAFFING 49	Policy Statement on Training and Qualification of Nuclear Power Plant Personnel 2.3.11	Withdraw policy statement -- training rule (10 CFR 50.120) and Part 55 supersede it.	See Topic Area 6.	3	RES	6/94 9/94 1/95C	COMPLETED A Federal Register notice withdrawing this policy statement (and 5 others) was published on 1/20/95.
TRAINING and STAFFING 50	Policy Statement on Engineering Expertise 2.3.11	Evaluate policy statement to determine if it has been treated as a requirement.	1. Determine whether training rule (Part 55) and STA-based training supersede policy statement. If so, withdraw policy statement. 2. If not and if considered necessary, publish proposed rule. Note: Commission reaffirmed policy statement position after SECY-93-193. IN 93-81 issued which restates Commission's preferred position of dual role STA/SRO.	3	NRR	12/94 6/94C As needed	COMPLETED Based on the Commission's 1993 reaffirmation of the policy statement, the findings from recent NRC evaluations of policy implementation, and the recent promulgation of an information notice concerning STA implementation, the staff has decided to retain the policy statement. The staff does not consider rulemaking to be necessary and plans no further action on this RRG issue.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
<p>TRAINING and STAFFING</p> <p>51</p>	<p>Policy Statement on Nuclear Power Plant Staff Working Hours</p> <p>2.3.11</p>	<p>Evaluate policy statement to determine if it has been treated as a requirement.</p>	<p>Original Action Plan</p> <ol style="list-style-type: none"> 1. Publish proposed rule. 2. Publish final rule. <p>Notes: Policy statement put into Technical Specifications through GL 82-12. Policy statement forms the basis for Technical Specification 5.2.2 in the new Standard Technical Specifications.</p> <p>Revised Action Plan (9/94) (4/95)</p> <ol style="list-style-type: none"> 1. Publish draft GL, allowing a line-item improvement to remove working hours requirements from Technical Specifications, for public comment. 2. Issue Commission information paper. 3. Issue generic letter. 	<p>3</p>	<p>NRR</p>	<p>12/94 12/95</p> <p>Revised (4/95) (1/96)</p> <p>5/95 5/96</p> <p>11/95 7/96</p> <p>12/95 12/96</p>	<p>ONGOING</p> <p>Background</p> <p>The staff found that this policy statement had been treated as a requirement. It will resolve this topic area by allowing a line-item improvement to Technical Specifications which would permit licensees to remove working hours requirements from Technical Specifications. For efficiency of staff resources, this improvement is being included in a GL which consolidates a number of line-item improvements that are administrative in nature.</p> <p>Status</p> <p>The schedule for completing this work has been revised to be consistent with the schedule for the broader-scope GL. Because of other higher priority work and the need for CRGR review, the draft GL is not expected to be issued for public comment before 5/96. The final GL is scheduled for issuance in 12/96.</p> <p>Information on continuation</p> <p>NRR is responsible for completing this item, which is being tracked in NRR's "Director's Monthly Status Report."</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
TRAINING and STAFFING 52	Policy Statement on Conduct of Nuclear Power Plant Operations 2.3.11	Evaluate policy statement to determine if it has been treated as a requirement.	Determine whether policy statement has been treated as a requirement. If it has not, take no further action. If it has and if considered necessary, publish proposed rule.	3	NRR	12/94 6/94C	COMPLETED The staff has no indication that this policy statement has been used as a requirement. Licensees have generally established administrative controls for the conduct of control room operations on a voluntary basis and in response to the Institute of Nuclear Power Operations (INPO) recommendations for good practices. No further action is planned for this RRG item.
TRAINING and STAFFING 53	Policy Statement on Education for Senior Reactor Operators and Shift Supervisors at Nuclear Power Plants 2.3.11	Evaluate policy statement to determine if it has been treated as a requirement.	1. Determine whether the training rule (Part 55) and STA-based training programs supersede this policy statement. 2. If they do, see Topic Area 6. 3. If they do not, determine if they are imposed as a requirement. If they are, publish proposed rule. If they are not, take no further action.	3	NRR	12/94 9/94 12/94C	COMPLETED The staff determined that this policy statement needed to be withdrawn and sent a <u>Federal Register</u> notice withdrawing this and 7 other policy statements, to the Commission on 9/30/94 for approval. The Commission did not approve withdrawal of this one, questioning what it would be replaced with if withdrawn. The staff reexamined its recommendation and determined that since the policy statement endorses good practices and had not been wholly superseded by 50.120 and Part 55, it should not be withdrawn. The staff communicated this to the Commission in 12/94.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
TECHNICAL SPECIFICATIONS 54	Control Over Material Removed From Technical Specifications 2.3.10g	10 CFR 50.71(e), 50.59, 50.36, and parts of 50.54 should be reviewed and revised to ensure that the system of improved Technical Specifications will maintain appropriate control of changes to materials that are removed from Technical Specifications and placed in licensee-controlled documents. Concerns with quality of FSARs and 10 CFR 50.59 process.	An SRM (5/25/93) asked staff to pursue possible ways to improve Technical Specifications mechanisms to achieve greater legal and administrative efficiencies. Original Action Plan 1. Develop Commission paper to address SRM. 2. Review NSAC-125 and endorse or develop and promulgate staff guidance separately, if appropriate. 3. Evaluate implementation and adequacy of 50.71(e) and integrate with results of Temporary Instruction (TI) 2515-112 on Chapter 2 of FSAR and recommend appropriate action. Note: SECY-92-314 also speaks to SRM issue of updating FSARs.	2	NRR	Revised (4/95) (1/96) 5/94 7/94C 6/94 6/95 9/95 TBD 12/94 6/95 9/95C	ONGOING Background Previously, the staff reported that by 9/95, it would review and endorse NSAC-125 or develop and promulgate staff guidance separately. In 4/95, the staff determined that endorsement of NSAC-125 is inappropriate due to inconsistencies between the document and the requirements of 50.59. Status Taking into consideration the results of activities in commitment management (Topic Area 7) and the CLB definition (Topic Area 8), the staff has renewed its efforts to evaluate alternative approaches for resolving this RRG item. The short-term approach is to issue interim staff guidance. For a longer-term solution, the staff is working on a detailed action plan addressing 50.59 implementation and related issues, such as the development of regulatory guidance regarding the implementation of 50.59. This action plan will also include consideration of using PRA in the 50.59 review process (Topic Area 30).

(continued on next page)

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
TECHNICAL SPECIFICATIONS 54, cont'd.	Control Over Material Removed From Technical Specifications						<p>(continued) As a part of its evaluations for Topic Areas 8 and 9, the staff concluded that 50.71(e) is adequate. In a 9/5/95 memorandum to F. Miraglia, the staff concluded that additional regulatory requirements are not necessary to ensure that FSARs are updated to reflect changes in site environs. A summary of the inspection findings, the staff's evaluation, and recommendations are contained in this memorandum. These actions complete Task 3.</p> <p>Information on continuation NRR is responsible for resolving Task 2. Once developed, the detailed action plan for this item will be included in NRR's "Director's Monthly Status Report."</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
<p>TECHNICAL SPECIFICATIONS</p> <p>55</p>	<p>Revise Generic Letter 88-16 -- Cycle-Specific Parameter Limits in Technical Specifications</p> <p>2.3.8</p>	<p>Provide quicker review of core reload codes.</p> <p>Revise current Technical Specifications to permit changes in accordance with approved core topical reports to take advantage of improved analyses without license amendment.</p>	<p>Original Action Plan</p> <p>1. Issue guidance to licensees on necessary content of core reload packages.</p> <p>2. Consider whether issuing guidance to licensees that contains revised Technical Specification language is appropriate.</p> <p>Revised Action Plan (4/95) (1/96)</p> <p>1. Issue draft supplement to GL 83-11, "Licensee Qualification for Performing Safety Analyses in Support of Licensing Actions," for public comment.</p> <p>2. Issue final GL 83-11 supplement.</p>	<p>2</p>	<p>NRR</p>	<p>12/94 9/95</p> <p>12/94 3/95</p> <p>Revised (4/95) (1/96) 8/95 10/95C</p> <p>5/96 9/96</p>	<p>ONGOING</p> <p>Background</p> <p><u>Tasks 1 and 4</u></p> <p>OGC objected to the staff's proposal to supplement GL 88-16 so that licensees would be allowed to use approved, later revisions of core reload methodologies without a license amendment. OCG's position is that this approach would circumvent public participation. Therefore, the staff decided to terminate these tasks.</p> <p><u>Tasks 2 and 5</u></p> <p>The staff has determined that a RG, which was to provide guidance for qualification of a new core reload analysis methodology and for qualification of new users of approved methodologies (by stating the required contents of topical reports) would not provide sufficient benefit to licensees/ vendors to justify the staff effort. Work on these tasks has been terminated because reactor/fuel vendors understand from prior staff interactions what is required by the staff for qualification of a new methodology. Also, licensees generally do not develop new analysis methodologies but utilize existing, approved methodologies. Therefore, a proposed RG would not have</p> <p>(continued on next page)</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
TECHNICAL SPECIFICATIONS 55, cont'd.	Revise Generic Letter 88-16 -- Cycle-Specific Parameter Limits in Technical Specifications						<p>(continued) reduced unnecessary burden and the staff terminated these tasks.</p> <p>Status The staff has redirected its efforts to revising GL 83-11 to eliminate the need for licensees to submit topical reports that would demonstrate to the staff that they have sufficient understanding of an existing, approved reload methodology to "qualify" them to perform their own analyses. The draft GL supplement was issued for public comment on 10/25/95. In the FR notice, the staff solicits comment on the concept of expanding the approach to include a more efficient process by which licensees/ vendors could improve their analysis methods and obtain NRC approval. The public comment period expired on 12/11/95. The delay in issuing the draft was due to the need to address staff comments during the concurrence process. Because of the delay in issuing the draft and the need to add time for CRGR review, the schedule for issuing the final GL supplement has been extended 4 months, from 5/96 to 9/96.</p> <p>(continued on next page)</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
TECHNICAL SPECIFICATIONS 55, cont'd.	Revise Generic Letter 88-16 -- Cycle-Specific Parameter Limits in Technical Specifications						(continued) Information on continuation NRR is responsible for resolving this item and has developed a detailed action plan which is being included in NRR's "Director's Monthly Status Report."
TECHNICAL SPECIFICATIONS 56	Allow Line-Item Improvements for Improved Standard Technical Specifications 3.3.4j	Permit line-item improvements in accordance with the Technical Specifications Improvement Policy for all individual licensees, in addition to lead plant licensees.	Policy Statement on Technical Specifications dated 7/22/93 stated line-item improvements would be accepted by NRC.	NA		No further action is required.	<u>COMPLETED</u>
REPORTING REQUIREMENTS 57	Delete Unnecessary Reporting Requirements 2.3.16c	License amendments to delete reporting requirements for reports that are "not required" in the new Standard Technical Specifications licenses should be acted upon by the staff.	Policy Statement on Technical Specifications allows line-item improvements (see Topic Area 56).	NA		No further action is required.	<u>COMPLETED</u>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
REPORTING REQUIREMENTS 58	Revise Regulatory Guide 1.16 2.3.15c 2.3.16 2.3.18	Revise RG 1.16, monthly operating report, to eliminate unnecessary reporting requirements.	<p>Original Action Plan</p> <p>1. Revise and publish draft RG 1.16 to reduce scope of monthly operating report accordingly (see Topic Area 59).</p> <p>2. Publish final RG.</p> <p>Revised Action Plan (9/94) (4/95)</p> <p>1. Issue draft generic letter informing licensees of reduced scope of monthly operating report for public comment.</p> <p>2. Issue final generic letter.</p>	2	RES NRR	<p>6/94</p> <p>1/95</p> <p>Revised (4/95) (1/96)</p> <p>7/95 6/95 8/95C</p> <p>10/95 3/96</p>	<p>ONGOING</p> <p>Background The staff determined to issue a GL instead of revising RG 1.16. The draft GL was issued on 8/18/95 for public comment and the comment period ended on 9/18/95.</p> <p>Status Due to the delay in issuing the draft GL and the extent of public comments received, the schedule for issuing the final has been revised to 3/96.</p> <p>Information on continuation With the assistance of AEOD, NRR is responsible for completing this item, which is being tracked in NRR's "Director's Monthly Status Report."</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
REPORTING REQUIREMENTS 59	Evaluate Need or Frequency for All Reporting Requirements Contained in Regulations, Technical Specifications, or Industry Codes and Standards 2.3.16d 2.3.16e 2.3.16f	The RRG report recommends a major staff effort to review all technical specification reporting requirements for special reports, situational reports, routine or periodic reports, and reports required by regulations.	<ol style="list-style-type: none"> 1. Provide draft rule changes to the Commission on items decided by RRG and Reporting Requirements Task Force that can be eliminated. 2. Publish final rule changes to eliminate requirements identified in action plan item 1 above. 3. Assess additional reporting requirements identified in public comments to determine whether they can be eliminated. 4. Publish draft rule changes to eliminate requirements from action plan item 3 above. 5. Publish final rule changes. 	2	RES NRR NRR RES RES	<u>Revised (1/96)</u> 9/94 11/94C 2/95 3/95C 12/95 3/96 6/96 TBD 12/96 TBD	ONGOING Background On 2/29/95, an interoffice panel was formed to coordinate and monitor staff efforts to evaluate the need for and frequency of all reporting requirements applicable to power reactor licensees. The panel consists of 8 standing members from AEOD, NMSS, NRR, OGC, and RES and is chaired by NRR. Status The panel has met 12 times since 3/95 (3/30, 4/20, 4/28, 5/12, 6/2, 6/8, 6/15, 6/24, 7/14, 7/26, 8/9, and 8/24) to organize and review user need statements (UNSS). The schedule for completing the assessment of other reporting requirements (Task 3) has been extended 3 months to reflect a delay in obtaining the remainder of the UNSS. Information on continuation Under NRR's cognizance, the panel will complete its review of the remaining UNSSs and develop recommendations on eliminating/changing additional reporting requirements. Completion of this task will be closely monitored by NRR management. RES will likely be responsible for any rule changes proposed as a result of

(continued on next page)

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
REPORTING REQUIREMENTS 59, cont'd.	Evaluate Need or Frequency for All Reporting Requirements Contained in Regulations, Technical Specifications, or Industry Codes and Standards						(continued) the panel's recommendations. These will be approved and prioritized by the EDO/Commission and reported on in the "NRC Regulatory Agenda."

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
MISCELLANEOUS 60	Decrease Direct Inspection Effort by 10% 1.5.1	Decrease direct inspection effort by 10% in FY 1994 instead of FY 1995.	<p>Original Action Plan</p> <ol style="list-style-type: none"> 1. Inspection program activities will be revised, as appropriate, to reduce inspection resources in program areas where current levels of oversight are not considered necessary. 2. Improve distribution of inspection resources based on PRA insights and licensee performance. 3. Evaluate impact of reduction of direct inspection effort. <p>Revised Action Plan for Task 2 (1/96)</p> <ol style="list-style-type: none"> 2a. Improve distribution of inspection resources based on licensee performance. 2b. Improve distribution of inspection resources based on PRA insights. 	2	NRR	<p>Revised (4/95) 3/94C</p> <p>9/94 7/95</p> <p>9/95 3/96</p> <p>Revised Task 2 Schedule (1/96) 7/95C</p> <p>12/96</p>	<p>ONGOING Background</p> <p>In SECY-94-210 (8/12/94), the staff described a new process, the Customized Inspection Planning Process (CIPP), to address weaknesses in the inspection program. The results of the trials for the CIPP, which had been renamed the Integrated Performance Assessment Process (IPAP), were reported in SECY-95-070 (3/21/95). In this paper, the staff stated that it would continue to develop and implement trials for the risk profile process on a path separate path from IPAP.</p> <p>Status</p> <p>A public information meeting, in lieu of a workshop, on staff initiatives related to the reactor inspection program was held on 4/11/95. In SECY-95-163 (6/21/95), the staff reported on various other initiatives it was pursuing to further improve the inspection program and on its final implementation plans for the IPAP, which increases emphasis on assessing facility safety performance. This was followed by a Commission briefing on the overall reactor inspection program on 7/26/95. The use of PRA insights in the inspection process is being considered as part</p> <p style="text-align: right;">(continued on next page)</p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
<p>MISCELLANEOUS</p> <p>60, cont'd.</p>	<p>Decrease Direct Inspection Effort by 10%</p>						<p>(continued) of the PRA Implementation Plan and will include consideration of improving the distribution of inspection resources. Risk-informed briefings of resident inspectors are being conducted by RES to transfer plant-specific risk insights derived from the individual plant examinations. This will enable inspection resources to be better focused on risk importance in the near term.</p> <p>Information on continuation NRR is responsible for resolving the remaining tasks under this item. Amplified information is being developed for the PRA Implementation Plan activity on evaluating the use of PRA insights in the inspection process. This information will be reflected in updates to the plan. NRR management will continue to monitor progress being made to decrease NRC's direct inspection effort and update the Commission as notable progress occurs.</p>
<p>MISCELLANEOUS</p> <p>61</p>	<p>Update 10 CFR 50.70(b)(2)</p> <p>2.3.10c</p>	<p>Revise the rule to address the office space necessary for resident inspectors.</p>	<p>Alternative Recommendation: No rulemaking for 50.70(b)(2) is necessary. No problems exist with current implementation.</p>	<p>NA</p>		<p>No additional action is required.</p>	<p><u>COMPLETED</u></p>

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
MISCELLANEOUS 62	Generic Communication System 2.3.6b	Have one generic communication that requests information from licensees and one that informs licensees.	1. Administrative letter format has been initiated. 2. Evaluate effectiveness after 2 years.	3	NRR	No additional action is required. 1/95C	COMPLETED The administrative letter format was proposed in SECY-93-174 (3/22/93) and approved by the Commission. The NRC issued 5 administrative letters in 1993 and 17 in 1994. The staff's review found that the format is an effective means of providing information to licensees.
MISCELLANEOUS 63	10 CFR 50.54(f) 2.3.6a	No revision to 10 CFR 50.54(f) needed.	No action necessary. Line organizations review issues for backfits, public and Commission comment period for generic communications, and current 50.54(f) letters reference applicable regulatory requirements.	NA		No additional action is required.	COMPLETED
MISCELLANEOUS 64	Eliminate Conflict Between 10 CFR 50.54(a)(3) and 50.71(e) 2.3.10d	Eliminate inconsistency between words in 50.54 and newly revised 50.71 regarding frequency of reporting changes to QA plan.	Final rule published on 8/16/93.	NA		No additional action is required.	COMPLETED The final rule was published on 8/16/93.
MISCELLANEOUS 65	Revise 10 CFR 50.7 2.3.10b	Revise 50.7 to reflect Energy Policy Act of 1992 for whistleblower protection to extend statute of limitations for whistleblower to file a claim from 30 days to 6 months; expand definition of whistleblower and employer; and change the burden of proof.	Final rule published on 10/8/93.	NA		No additional action is required.	COMPLETED The final rule was published on 10/8/93.

TOPIC AREA	ISSUE	RRG RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
MISCELLANEOUS 66	Graded Approach to Committees 3.3.4g	Allow graded approach to review functions of licensee onsite or offsite review committees to permit review of safety-significant items only.	Ongoing initiative within the Improved Standard Technical Specifications Program to permit licensees to define role of review committees (see Topic Area 56).	NA		No additional action is required.	<u>COMPLETED</u>

REGULATORY REVIEW GROUP IMPLEMENTATION PLAN -- ADDITIONAL ITEMS

TOPIC AREA	ISSUE	RRGITF NEW RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
<p>RULEMAKING PRACTICES</p> <p>A</p>	<p>Rulemaking Process Takes Too Long</p>	<p>Review rulemaking process to identify any improvements that can be made to accelerate rulemaking.</p>	<p>Original Action Plan Perform staff review for potential improvements to rulemaking process.</p> <p>Document the review in negative consent Commission paper describing potential improvements.</p> <p><u>Additional Action (9/94)</u></p> <p>Issue management directive implementing approved rulemaking improvements.</p>	<p align="center">2</p>	<p>RES</p>	<p>3/94C</p> <p>4/94 5/94C</p> <p><u>Schedule for Addition (9/94)</u> 1/95 11/94C</p>	<p><u>COMPLETED</u> SECY-94-141, recommending improvements to the rulemaking process, was submitted to the Commission on 5/23/94. A Commission SRM dated 6/23/94 approved the staff recommendations.</p> <p>A new management directive, MD 6.3, to implement the improvements to the rulemaking process was approved on 1/27/95 for publication and has been issued.</p>

TOPIC AREA	ISSUE	RRGITF NEW RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
SECURITY B	Staffing Requirements for Implementing Part 73 Are Too Burdensome	Review existing staff positions concerning use of onsite security force to meet provisions of Part 73. (Note: See J. Perry letter to J. Sniezek dated 1/12/93)	Review staff guidance on number and use of guard force as compensatory measures to ensure that effectiveness of security system is not reduced by failure of security equipment or structures. Original Action Plan Issue revised guidance and publish administrative letter. Revised Action Plan (9/94) 1. Issue draft generic letter informing licensees of SECY-93-326 Option 3. 2. Issue final generic letter.	2	NRR	1/94C 3/94 Revised (9/94) (4/95) 10/94 11/94C 9/95 1/96 Note: Schedule to be commensurate with Topic Area 14.	ONGOING Background The staff issued a GL informing licensees of the opportunity to implement Option 3 of SECY-93-326 (approved by the Commission on 2/18/94). Since then, actions under this item have been combined with the actions under Topic Area 14 for consistency and increased staff efficiency. A draft GL addressing the actions of Topic Areas 14 and B was issued for public comment in 11/94. Extensive, diverse comments were received. Status The final GL was forwarded to the CRGR for review and endorsement on 9/28/95. The staff estimates that the final GL will be issued in 1/96. This delay is due to the time needed to resolve the comments on the draft GL and staff-CRGR interactions on the wording of the final GL. Information on continuation NRR is responsible for completing this item, which is being tracked in NRR's "Director's Monthly Status Report."

TOPIC AREA	ISSUE	RRGITF NEW RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS
GENERIC COMMUNICATIONS C	Supervisory Oversight of Draft Generic Communications	<p>1. Eliminate those generic communications that are old and not under active development.</p> <p>2. Perform periodic supervisory review of list of generic communications (initially on a 6-month interval) to monitor progress of all generic communications.</p>	<p>Incorporate recommendation into office procedures.</p> <p>Periodic supervisory review of list of generic communications.</p>	3	NRR	<p>Complete</p> <p>6/94 3/94C</p>	<p><u>COMPLETED</u></p> <p>The action to periodically review the list of generic communications under development has been incorporated into office procedures. A supervisory review was conducted in 3/94 to monitor the progress of all generic communications.</p>
PART 20 D	10 CFR 20.1703 (Medical Respirator Uses) Should Be Revised for Potential Improvements in Testing Requirements	<p>Revise 10 CFR 20.1703 (a)(3)(v) to change the period of fitness determinations from annually to periodically depending on age.</p> <p>Consider using ANSI Z88.2-1992 in this area.</p>	<p>1. Publish proposed rule.</p> <p>2. Publish final rule.</p>	2	RES	<p>8/94 9/94C</p> <p>2/95C</p>	<p><u>COMPLETED</u></p> <p>The NRC issued the proposed rule for public comment on 9/16/94. The final rule was published on 2/10/95.</p>

TOPIC AREA	ISSUE	RRGITF NEW RECOMMENDATION	ACTION PLAN	PRI	LEAD OFFICE	SCHEDULE Orig. Rev.	CURRENT STATUS																		
PART 20 E	Regulatory Guides for the Revised Part 20	Remaining regulatory guides should be revised to be consistent with the revised Part 20 requirements.	<ol style="list-style-type: none"> 1. Publish draft RG 8.13. 2. Publish draft RG 8.29. 3. Publish final RG 8.13. 4. Publish final RG 8.29. 5. Publish remaining draft RGs or information notice, as necessary. 6. Publish final RGs. <p>NOTE: The RGs considered necessary by the staff to assist with the implementation of revised Part 20 have already been issued (IN 93-80).</p>	2	RES	<p>Revised (4/95) (1/96)</p> <table border="0"> <tr> <td>6/94</td> <td>9/94</td> </tr> <tr> <td></td> <td>10/94C</td> </tr> <tr> <td>9/94</td> <td>1/95C</td> </tr> <tr> <td>12/94</td> <td>9/95</td> </tr> <tr> <td></td> <td>6/96</td> </tr> <tr> <td>3/95</td> <td>10/95</td> </tr> <tr> <td></td> <td>2/96</td> </tr> <tr> <td>12/94</td> <td>As needed</td> </tr> <tr> <td>12/95</td> <td>1 yr. after draft</td> </tr> </table>	6/94	9/94		10/94C	9/94	1/95C	12/94	9/95		6/96	3/95	10/95		2/96	12/94	As needed	12/95	1 yr. after draft	<p>ONGOING Background</p> <p>The availability of draft revised RG 8.13 for public comment was noticed on 10/31/94 and the public comment period expired on 3/17/95. The availability of draft revised RG 8.29 for public comment was noticed on 1/13/95 and the public comment period expired on 3/15/95.</p> <p>Status</p> <p>Due to extensive public comments requiring a major rewrite and to diversion of staff resources to rulemaking activities, issuance of the final draft of revised RG 8.13 is expected to be delayed until 6/96, 9 months later than previously projected. The final draft of revised RG 8.29 is in concurrence. It has also been delayed due to competing workload but is expected to be issued in 2/96.</p> <p>The staff has not identified other RGs that need to be revised at this time. Therefore, with the issuance of RGs 8.13 and 8.29, this RRG topic will be considered to be completed.</p> <p>Information on continuation</p> <p>RES is responsible for tracking and completing this item.</p>
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