Template NRR-111

March 14, 2000

LICENSEES: Northern States Power Company
Wisconsin Electric Power Company
Wisconsin Public Services Corporation
IES Utilities, Inc.

FACILITIES: Monticello Nuclear Generating Plant
Prairie Island Nuclear Generating Plant, Units 1 and 2
Point Beach Nuclear Plant, Units 1 and 2
Kewaunee Nuclear Power Plant
Duane Arnold Energy Center

SUBJECT: MEETING SUMMARY FOR THE NRC/NMC LICENSING WORKSHOP, MARCH 7-8, 2000 (TAC NO. MA6843)

The Nuclear Regulatory Commission (NRC) and utilities comprising the Nuclear Management Company, LLC (NMC) jointly sponsored a licensing workshop March 7-8, 2000, in Hudson, Wisconsin. Attendees included staff of the NMC member utilities and the NRC, a representative of the State of Minnesota, and members of the public. The objectives of the workshop were to improve the quality of licensing submittals, promote understanding of NRC processes, enhance the regulatory interface, and establish better working relationships.

Representatives from the NRC Division of Licensing Project Management presented information on the role of the project manager and the licensing assistant, regulatory processes, and the status of initiatives such as electronic information exchange and risk-informed licensing actions. Utility representatives presented the status of NMC formation activities and feedback on the revised NRC inspection and oversight process. The agenda, a list of attendees, copies of the slides used at the workshop, and a summary of the feedback received from workshop attendees are enclosed.

No regulatory decisions or commitments were requested or made during the meeting.

/RA/

Carl F. Lyon, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-263, 50-282, 50-306, 50-266, 50-301, 50-305, 50-331

Enclosures: 1. Agenda
2. List of Attendees
3. Presentation Slides
4. Summary of Feedback

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

March 14, 2000

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Carl F. Lyon, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
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cc w/encls: See next page

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NRC/NMC LICENSING WORKSHOP AGENDA
HUDSON, WI
MARCH 7-8, 2000

Tuesday, March 7

TIME	SUBJECT	LEADER
8:00 - 8:15	Opening and Introductions	Singh Bajwa
8:15 - 8:30	Welcome	Doug Johnson
8:30 - 8:45	Workshop Scope and Objectives	Claudia Craig
8:45 - 9:45	DLPM Re-Invention and PM Responsibilities	Claudia Craig
9:45 - 10:15	LA Responsibilities	Ramona Bouling
10:15 - 10:30	Break	All
10:30 - 12:00	License Amendment Review Process (OL 803)	Brenda Mozafari
12:00 - 1:00	Lunch	All
1:00 - 1:30	NMC Status Update	Doug Johnson
1:30 - 2:30	TIA Process	TJ Kim
2:30 - 2:45	Break	All
2:45 - 4:15	Discuss Attributes of a Good Licensing Submittal and Critique Sample Submittals	Singh Bajwa and Ken Putnam
4:15 - 4:30	Day 1 Closing Remarks	Singh Bajwa

ENCLOSURE 1

Wednesday, March 8

TIME	SUBJECT	LEADER
8:00 - 8:15	Review Previous Activities	Singh Bajwa
8:15 - 9:00	Changing NRC Processes #1	NRC*
9:00 - 9:45	Experience with the New Oversight Process	Jeff Kivi
9:45 - 10:00	Break	All
10:00 - 11:30	Discuss Attributes of a Good NRC Safety Evaluation and Critique Sample Evaluations	Fred Lyon and Marc Voth
11:30 - 12:30	Lunch	All
12:30 - 1:30	Changing NRC Processes #2 (remaining topics from morning session)	NRC
1:30 - 2:00	Closing Comments and Feedback	Singh Bajwa, Claudia Craig, and Doug Johnson

*Multiple Topics:

Risk-Informed TSs - TJ Kim
NRR Work Control Center - Claudia Craig
ADAMS and Electronic Information Exchange - Fred Lyon
Relief Requests - Fred Lyon
NOEDs - Fred Lyon
Generic Changes/TSTFs - Fred Lyon

Attendee List
NRC/NMC LICENSING WORKSHOP
MARCH 7-8, 2000
HUDSON, WI

NAME	POSITION	ORGANIZATION	TELEPHONE
Doug Johnson	Director, Regulatory Services	NMC*	715-377-3317
Ken Putnam	Licensing Manager	DAEC**	319-851-7238
Tony Browning	Senior Licensing Engineer	DAEC	319-851-7750
Michael Wiesneth	Senior Licensing Engineer	DAEC	920-755-6073
Clara Rushworth	Licensing Engineer	DAEC	319-851-7157
John Kerr	Licensing Engineer	DAEC	319-851-7492
Marcus Voth	Licensing Project Manager	Monticello	763-271-5116
Sam Shirey	Senior Licensing Engineer	Monticello	763-295-1449
Doug Neve	Senior Licensing Engineer	Monticello	763-295-1353
Jim Knorr	Regulatory Compliance Manager	Point Beach	920-755-6863
Lisa Schofield	Licensing Engineer	Point Beach	920-755-6043
Jack Gadzala	Licensing Manager	Point Beach	920-755-6093
Gene Eckholt	Licensing Project Manager	Prairie Island	651-388-1121
Jeff Kivi	Senior Licensing Engineer	Prairie Island	651-388-1121
Jack Leveille	Licensing Engineer	Prairie Island	651-388-1121

*NMC (Nuclear Management Company)
**DAEC (Duane Arnold Energy Center)

ENCLOSURE 2

Attendee List (Continued)
NRC/NMC LICENSING WORKSHOP
MARCH 7-8, 2000

NAME	POSITION	ORGANIZATION	TELEPHONE
Tom Webb	Nuclear Licensing Director	Kewaunee	920-388-8537
Jerry Riste	Licensing Engineer	Kewaunee	920-388-8424
Brad Kelly	Rates Analyst	Minnesota Department of Commerce	651-296-7606
George Crocker	Executive Director	North American Water Office	651-770-3861
Charles Horowitz	Attorney	Member of the Public	612-343-5791
Carol Overland	Attorney	Member of the Public	507-664-0252
Singh Bajwa	Director, Project Directorate III	NRC*	301-415-2040
Claudia Craig	Section Chief, Project Directorate III	NRC	301-415-2429
Ramona Bouling	Licensing Assistant, Project Directorate III	NRC	301-415-3039
Brenda Mozafari	Project Manager, DAEC	NRC	301-415-2020
T.J. Kim	Project Manager, Kewaunee and Prairie Island	NRC	301-415-1392
Fred Lyon	Project Manager, Monticello	NRC	301-415-2296

* NRC (NRC/NRR/DLPM)

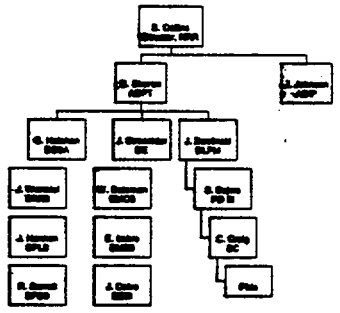
LICENSING WORKSHOP OBJECTIVES

Claudia Craig, Section Chief,
PD III, NRR

OBJECTIVES

- Improve licensee submittal quality
- Promote understanding of NRC process
- Enhance regulatory interface
- Establish better working relationships

NRR ORGANIZATION



WHY DO WE NEED IMPROVED LICENSING PERFORMANCE?

- NRC
  - → Budget
  - → Operating plan goals
  - → Emphasis on strategic objectives
- Licensee
  - → Faster response
  - → Stable regulatory environment

BENEFITS FROM IMPROVED SUBMITTALS

- Reduce extent and duration of interactions
- Maximize number of submittals DLPM staff reviews vs technical staff
- Reduce number of false starts
- Timeliness and efficiency

LICENSING GOALS

- Last FY NRR met all licensing goals
- FY 00 goals:
  - → Less than 700 actions in inventory
  - → Complete 1500 licensing actions
  - → 95% of all actions less than 1 year old
  - → 100% of actions less than 2 years old
  - → Complete 800 licensing activities

PREVIEW OF CLOSING SESSION

- Did workshop meet objectives?
- How can we assess licensing quality?
- Lessons learned to integrate into licensing practices
- Suggestions for improving communications
- Need for more in the future?

DLPM REINVENTION

Claudia Craig

BACKGROUND

- Undertook effort due to reorganization and previous audits and reviews
- Reevaluate, clearly define and communicate functions and responsibilities of PMs
- Correlate PM functions with strategic objectives
- Improve the planning, budget, and performance management processes

PROCESS

- Solicited internal and external stakeholder feedback
- Implementing plan completed 10/99
- Implementing plan included budget information and identified major program areas:
  - → Licensing authority
  - → Interfaces
  - → Regulatory improvements

RESULTS

- Each program area was described and tied to performance measures and outcomes
- Under each program area, identified categories with activities and tasks
- Tasks were prioritized and ranked
- Each task had performance measures and outcomes, output, references and stakeholders
- Over 70 tasks were identified and budgeted

LICENSING AUTHORITY

- Licensing actions
- Mandated controls
- Other licensing tasks

INTERFACES

- Regional
- Licensee
- Public
- Owners groups
- Other HQ entities

REGULATORY IMPROVEMENTS

- LATF
- Process improvements
- Workshops
- OL 803
- PM handbook

GOING FORWARD

- Used in DLPM operating plan, budget justification, resource allocation
- Tasks will be added and shed
- DLPM was pilot for other reinvention efforts in NRR

PROJECT MANAGER RESPONSIBILITIES

Claudia Craig

PM ROLES

- Headquarters focal point
- Licensee performance evaluation
- Project management

FOCAL POINT

- Knowledgeable of plant design and status
- Coodinate plant visits, licensee drop-ins, meetings, and briefings
- Administrative functions

PM INTERFACES

- Licensee
- Region
- State government, Congress, other government agencies
- Public

PERFORMANCE EVALUATON

- Region has lead
- Role of NRR reduced

PROJECT MANAGEMENT

- PMs manage all correspondence between the licensee and NRC headquarters

LICENSING ASSISTANT RESPONSIBILITIES

Ramona Bouling

LICENSING ASSISTANT RESPONSIBILITIES

Overall Role of the Licensing Assistant

- To serve as the Project Directorate contact on the agency's rules, regulations, and procedures as they relate to the licensing process.
- To assist the Project Managers in carrying out the necessary procedural and administrative tasks associated with the processing of licensing actions.

LICENSING ASSISTANT RESPONSIBILITIES

Review and Recordkeeping Responsibility - Document Types

- License/TS Amendments (including exigent/emergency)
- Orders, Exemptions, Environmental Assessments, Reliefs
- Federal Register Notices
- Proprietary Letters
- Service Lists
- Notices of enforcement discretion
- Generic letters/Safety Evaluations
- Controlled Correspondence
- Environmental Reports

LICENSING ASSISTANT RESPONSIBILITIES

License Amendment Application Review

- Completeness - Verify that all components of the application are present (O&A or acceptable alternative, NSHC, Environmental Consideration, TS pages)
- Implementation
  - Is there a specific implementation requested?
  - Is the amendment needed for startup/shutdown?
- Supplemental Letters
  - Is the supplement changing any portion of a previously noticed NSHC?
  - Was the supplement submitted under oath and affirmation or acceptable alternative?
  - Does the supplement change the TS pages?
  - Is the supplement withdrawing all or part of the original application?

LICENSING ASSISTANT RESPONSIBILITIES

License Amendment Application Review (continued)

- TS pages
  - Are all TS pages affected by the proposed amendment included with the application?
  - Are there any outstanding amendments affected by the same TS pages?
  - Are there any changes made to the TS page that are not reflected in the application?
  - Do the TS pages reflect the most current amendment as in our authority file?

LICENSING ASSISTANT RESPONSIBILITIES

Other Licensing Actions

- Orders, Exemptions, Environmental Assessments
  - Review these documents for non-technical accuracy and agreement with internal guidelines and procedures
  - Ensure these documents are published in the FEDERAL REGISTER
  - Ensure that appropriate EPA officials receive copies of EAs
- Environmental Reports
  - Ensure that effluent and radiological reports are forwarded to appropriate contacts at EPA, U.S. Fish & Wildlife Service, and NIST

LICENSING ASSISTANT RESPONSIBILITIES

Other Licensing Actions (continued)

- Federal Register Notices
  - Ensure that all documents to be published in the FEDERAL REGISTER are processed accurately
  - Verify all citations, comment periods, hearing dates, etc.
  - Communicate with appropriate offices to have corrections made to notices
  - Ensure that a copy of the notice is forwarded to the licensee

LICENSING ASSISTANT RESPONSIBILITIES

- Newspaper notices
  - Coordinate effort on emergency/exigent notices for publishing in local newspapers
- Proprietary Letters
  - Verify submittal of valid affidavit
  - Prepare and review appropriate letters related to withholding of proprietary information from public disclosure

LICENSING ASSISTANT RESPONSIBILITIES

Other Licensing Actions (continued)

- Service lists
  - Maintain all current addresses/titles for service list distribution
  - Ensure updated service lists are forwarded to NRC Regional offices

OFFICE LETTER 803, REV.3

BRENDA L. MOZAFARI

NRC/NMC Workshop
March 7-8, 2000

REVISION 3 to OL 803

- 1999 reorganization to DLPM
- Applicability to other licensing actions (e.g., exemptions, reliefs, EP plan)
- Cover decommissioned units
- Clarification and consistency

OL 803 - GENERAL

- Establish procedures for processing license amendments
- Expand procedures to include other licensing work (e.g., reliefs, exemptions, QA plan, EP changes)
- Maintain OL 803 as a living document with annual updates expected

Introduction

- Processing of Licensing Actions
  - Initial Processing
  - Work planning/Reviewer
  - Noticing/No Significant Hazards Determination and Environmental Assessment
  - Review process and document preparation

Initial Processing

- Amendments, relief requests, exemptions
  - Acceptance review
  - Work planning
  - Prioritization

Acceptance Review

- Oath & affirmation, State copy
- Clear description of change
- Safety analysis and justification
- NSHC and EA (or exclusion)
- Approval and implementation schedules
- Is it risk-informed?

Work Planning

- PM (and Technical Staff)
  - Search for precedents
  - Review method (PM, tech staff, etc.)
  - Scope & depth of review
  - Resource planning and schedule
  - Priority

Priorities

- Priority 1
  - Highly risk-significant safety concern
  - Issue involving plant shutdown, derate, or restart
  - Compliance with statutory requirements

Priorities (continued)

- Priority 2
  - Significant safety issue
  - Support continued safe plant operations
  - Determine significance of operating event
  - Risk-informed licensing action
  - Topical report with near-term or significant safety benefit

Priorities(continued)

- Priority 3
  - Moderate to low safety significance
  - Cost beneficial licensing actions
  - Generic issue or multi-plant action
  - Topical report with limited benefit

NSHC Determination

- NSHCD Based on 50.92 (51 FR 7751)
  - Significant increase in probability or consequences of an accident
  - Possibility of new or different accident
  - Significant reduction in margin of safety
- If proposed as NSHCD, a hearing can occur after amendment issuance
- If SHC or no determination, any hearing would precede amendment issuance

Environmental Assessments

- Environmental Impact Statements (EIS) and Environmental Assessments (EA) based on 10 CFR 51.20 to 51.22
  - EIS very rarely revised
  - Categorical exclusions for EA are found under 10 CFR 51.22
  - Most amendments meet the exclusions
  - EA, if needed, must be noticed in the Federal Register prior to amendment issuance

Noticing

- Routine amendments, 50.91(a)(2)
  - Bi-weekly or individual Federal Register notices -30 day comment period
  - Notice of proposed amendment, proposed NSHC, hearing opportunity
  - Notice of issuance
- If a proposed NSHC determination is not made, individual notice is required
  - Can't be handled as an exigent or emergency

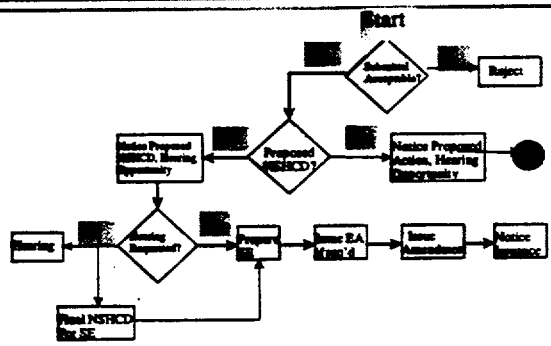
Noticing - Exigent amendment

- Notice in Federal Register (FR) if amendment is needed after 15 days but before 30 days
  - Individual FR notice
  - Repeat notice in biweekly FR
- Notice in local media if amendment needed after 6 but before 15 days
  - Repeat in biweekly FR notice
- The NRC must make a final NSHC determination for each amendment

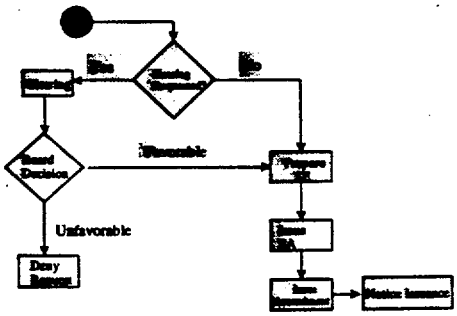
Noticing - Emergency Amendment

- Emergency amendments are noticed after issuance to allow for comment and an opportunity for hearing

Amendment Process



Amendment Process



Reviewer Assignments

- Reviews can be performed by PM or technical staff. Considerations include:
  - Technical complexity & risk significance
  - PM technical expertise
  - Conformance to improved Standard Technical Specifications (ISTS) guidance
  - Conformance to precedents
  - Resource availability & schedule needs

Review Process And Document Preparation

- Review process
  - Identify Precedents
  - Ensure Request meets current expectations
  - Requests for additional information (RAIs)
  - Regulatory commitments
- Document preparation
  - Safety evaluation
  - Concurrence review
  - Amendment issuance

Review Process And Document Preparation

- Requests for additional information (RAIs)
  - Staff goal = 1 RAI per reviewing technical branch
  - Early communication with licensee
    - Resolve minor issues
    - Clarify questions
    - Establish a reasonable response date

Development of RAI

- Use Telecons and meetings
  - Clarify questions
  - Establish where docketed information may already be available
  - Schedule licensee response - note in cover letter

Commitments

- Hierarchy of licensing-basis information
  - Obligations - license, TS, rules, orders
  - Mandated Licensing-Basis Information - UFSAR, QA/security/emergency plans
  - Regulatory Commitments - docketed statements agreeing or volunteering to take specific action
  - Non-Licensing-Basis Information

Commitments

- Commitments stated in the SE are considered part of the licensing basis but are not legal requirements.
- The SE should clearly identify actions that are considered regulatory commitments.
- Control of commitments is accomplished via licensees' programs.

Safety Evaluation

- Safety Evaluations typically include:
  - Staff evaluation - how amendment satisfies regulatory requirements
  - State consultation
  - Environmental considerations
- An EA may be needed for:
  - Emergency/exigent provisions
  - Final NSHC determination when no categorical exclusion applies

Concurrence

- Licensing Assistant
  - Format and revised TS pages
- Technical Branch
  - Technical adequacy
- Technical Specifications Branch
  - Significant deviations from iSTS guidance or changes consistent with iSTS
  - Use of 10 CFR 50.36 criteria
- Office of the General Counsel
  - Legal defensibility and completeness

Amendment Issuance

- Issued after we've addressed all comments from public and state
- Transmitted to licensee via letter
  - Issued after associated EA appears in the Federal Register
- Standard distribution (cc) list
  - Notify NRC staff via a docketed letter if organization changes affect the list
- Federal Register notice of issuance

REFERENCES

- NRR Office Letter 803, Rev. 3
- 10 CFR 50.30 (Applications)
- 10 CFR 50.90 (Amendment Applications)
- 10 CFR 50.91 (Noticing, State Consultation)
- 10 CFR 2.105 (Noticing)
- 10 CFR 50.92 (NSHCD, Issuance)
- 10 CFR 51.20-22 (EIS and EA)
- 10 CFR 50.36 (TS Criteria)
- SECY 98-244 (Commitments)

The NMC

- NMC Operations Include
  - Duane Arnold
  - Kewaunee
  - Monticello
  - Point Beach
  - Prairie Island

TODAY

2600 Employees

3581 MW

5 Sites

7 Units

BACKGROUND & STATUS OF NMC

- In August 1998, Alliant, NSP, WEPCo, and WPS agreed to form an alliance to enhance cooperation among our nuclear operations.
- In February 1999, NSP, WEPCo, WPS announced the formation of Nuclear Management Company, LLC.
- Alliant has fully participated in NMC startup and became a NMC member in November 1999 following SEC approval.
- NMC formed to sustain safety, optimize reliability and improve operational performance of member plants.

BACKGROUND & STATUS OF NMC

(Continued)

- Four utilities agreed to a phased approach to the NMC.
- NMC will initially provide selected support services.
- Services Agreements executed in April 1999.
- Service Development Teams are defining initial set and scope of services to be provided by NMC.
- WI and MN utility commissions have approved Services Agreements.
- NMC will begin providing services by January 2000.

BACKGROUND & STATUS OF NMC
(Continued)

- The four participating utilities agreed in principle in July 1999 to proceed in unison to a consolidated operating company.
- Nuclear Power Plant Operating Services Agreements have been executed between the four utilities and NMC.
- NRC license transfer applications were submitted in November 1999.
- State regulatory filings also made in November 1999.
- NMC is in progress of staffing key management positions and building business infrastructure.
- Goal is to have NMC become the licensed operator no later than June 2000.

NMC As A Proposed Operating Company

- Operating authority for each plant will be transferred to the NMC. As such NMC will have exclusive responsibility for the operation and maintenance of the plants.
- Plant ownership will not be affected. Owner utility will be a co-licensee (possession only) as the plant asset owner.
- Entitlement to capacity and energy from the plants will not be affected - stays with the owner utility.
- Owner utility retains financial obligations.
- Site organizations substantially preserved.
- Operating Agreement establishes responsibilities and authority.

Nuclear Regulatory Commission License

NRC License

Owner
Utility

- Financial Assurance
- Insurance and Liability
- Fuel and SNM
- Decommissioning Fund

Operator
NMC

- Technical Qualification/Training
- Technical Specification
- Operation/Maintenance/Design
- Reporting
- Quality Assurance and Oversight

NMC Vision

Balanced Approach - safety, production, cost

Performance Culture – through people

Capture up-side improvements

Limit down-side risks

Strategically positioning assets for the future

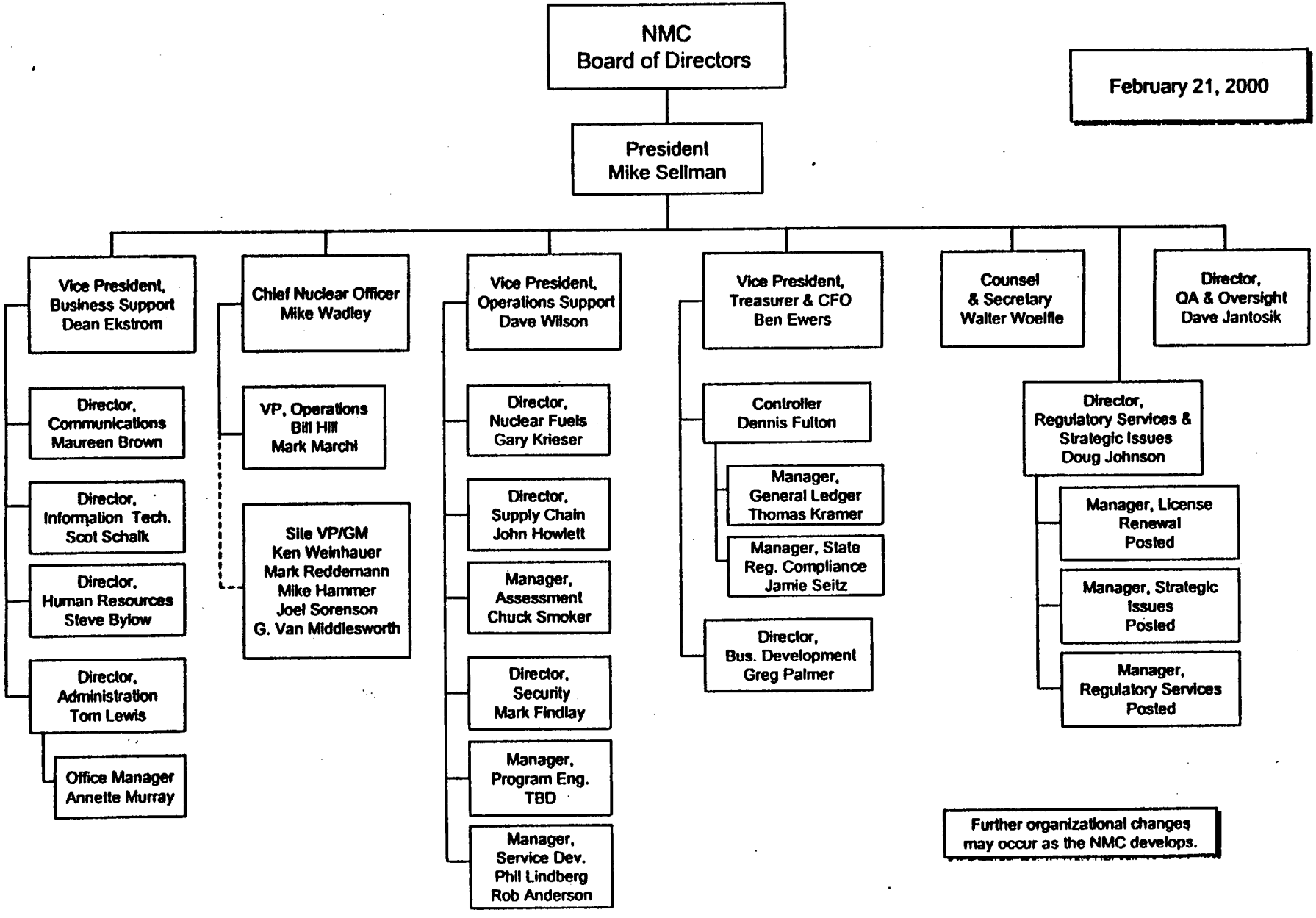
NMC Reduces Risk

- **Greater Organizational Capability and Depth**
- **Increased Issue Response Capability**
- **Reduced Employee Uncertainty**
- **Increased Regulatory Margin With NRC**
- **Strong Assessment and Oversight**

NMC Derives Value

- **Attract and Retain Best Nuclear Talent**
- **Retain Key Leaders and Managers**
- **Leverage Skills and Best Practices**
- **Achieve Top Quartile Performance**
- **Improved Economics Support Life-Extension**
- **Maintain and Create Strategic Options**

NUCLEAR MANAGEMENT COMPANY, LLC



What Will Be NMC's Operating Principles?

- ❑ Operate Conservatively
- ❑ Maintain Equipment in Excellent Condition
- ❑ Run Safe, Effective, Short Outages
- ❑ Find Our Own Problems and Correct Them Expeditiously
- ❑ Value People and Reinforce Expectations Daily
- ❑ Write Technically Correct, Terse Procedures and Follow Them
- ❑ Spend Our Resources Wisely
- ❑ Balance Safety, Production, and Cost
- ❑ Be an Environmental Leader and Good Neighbor

NRC/NMC LICENSING WORKSHOP

TASK INTERFACE AGREEMENTS (TIAs)

T. J. KIM
LICENSING PROJECT MANAGER
NRR/NRC

MARCH 7-8, 2000

WHAT IS A TIA?

- REQUEST FOR TECHNICAL ASSISTANCE FROM A REGION OR ANOTHER NRC OFFICE THAT USUALLY DEALS WITH—
  - POLICY ISSUES
  - A SPECIFIC PLANT EVENT
  - A POTENTIAL GENERIC ISSUE
  - AN INSPECTION FINDING
  - TS INTERPRETATIONS
- THE TIA IS ONE OF NRR'S PRIMARY MEANS TO SUPPORT OTHER NRC ORGANIZATIONS.
- TIA PROCESS IS DESCRIBED IN NRR OFFICE LETTER 1201, REV. 2 (JULY 26, 1999)

PROJECT'S ROLE AND RESPONSIBILITY IN TIAs

- PROJECT'S SECTION CHIEF—GATE KEEPER OF INCOMING TIAs
- PROJECT MANAGER—OVERALL RESPONSIBILITY FOR COORDINATING NRR RESOURCES TO ENSURE TIA RESPONSES ARE COMPLETE, ACCURATE, AND TIMELY
- PROJECT DIRECTOR—AS THE NRR MANAGEMENT INTERFACE WITH THE RESPONSIBLE REGION, OVERSEE THE TIA PROCESS TO ENSURE EFFECTIVE IMPLEMENTATION
- PROJECT'S DEPUTY DIVISION DIRECTOR—SIGNATURE AUTHORITY OF THE TIA RESPONSES. ENSURES EFFECTIVE AND CONSISTENT IMPLEMENTATION ACROSS THE REGIONS.

POTENTIAL IMPACT OF TIAs

- THE TIA RESPONSE DOCUMENTS NRR STAFF POSTION ON A GIVEN ISSUE.
- THE TIA RESPONSE CAN RESULT IN DETERMINATION OF NONCOMPLIANCE, WHICH MAY LEAD TO—
  - ☹ NOED
  - ☹ ENFORCEMENT ACTION
  - ☹ EXIGENT/ EMERGENCY TS AMENDMENT
  - ☹ TS AMENDMENT
- GENERIC ISSUES ARE FORWARDED TO THE GENERIC COMMUNICATIONS BRANCH FOR DISPOSITION.
- TIA RESPONSE IS DISTRIBUTED TO ALL REGIONS FOR INFORMATION.

IS THE TIA PROCESS OPEN?

- THE TIA AND THE RESPONSE ARE INTERNAL NRC DOCUMENTS.
- SOME SITUATIONS MAY WARRANT ISSUING THE TIA RESPONSE DIRECTLY TO A LICENSEE OR A GROUP OF LICENSEES
- WHERE APPROPRIATE, LICENSEE INPUT MAY BE SOLICITED BEFORE TIA RESPONSE IS FINALIZED.

STREAMLINING LICENSING SUBMITTALS

MARCH 7-8, 2000

NRC/NMC LICENSING WORKSHOP

HUDSON, WI

FRED LYON
PROJECT MANAGER - MONTICELLO

Discussion Focus

- Generic Technical Specification Changes
- Consolidated Line Item Improvements
- Use of Electronic Media

GENERIC TECHNICAL SPECIFICATION CHANGES

- Improved Standard Technical Specifications
- Streamline License Amendment Requests
- Streamline NRC Staff Review
- Sponsored by Technical Specification Task Force (TSTF)
- TSTF - Representatives from Four Owners Groups and the Nuclear Energy Institute (NEI)

- Industry Focus has Shifted from Improved Technical Specification (ITS) Submittals to Generic Changes to ITS NUREGS
- Generic Changes Reviewed and Prepared using TSTF Process
- After NRC Approval, Generic Changes are Available for Plants with ITS or are Developing ITS
- NRC Review Lead times may Necessitate Approval of Plant Specific Change before Generic Change

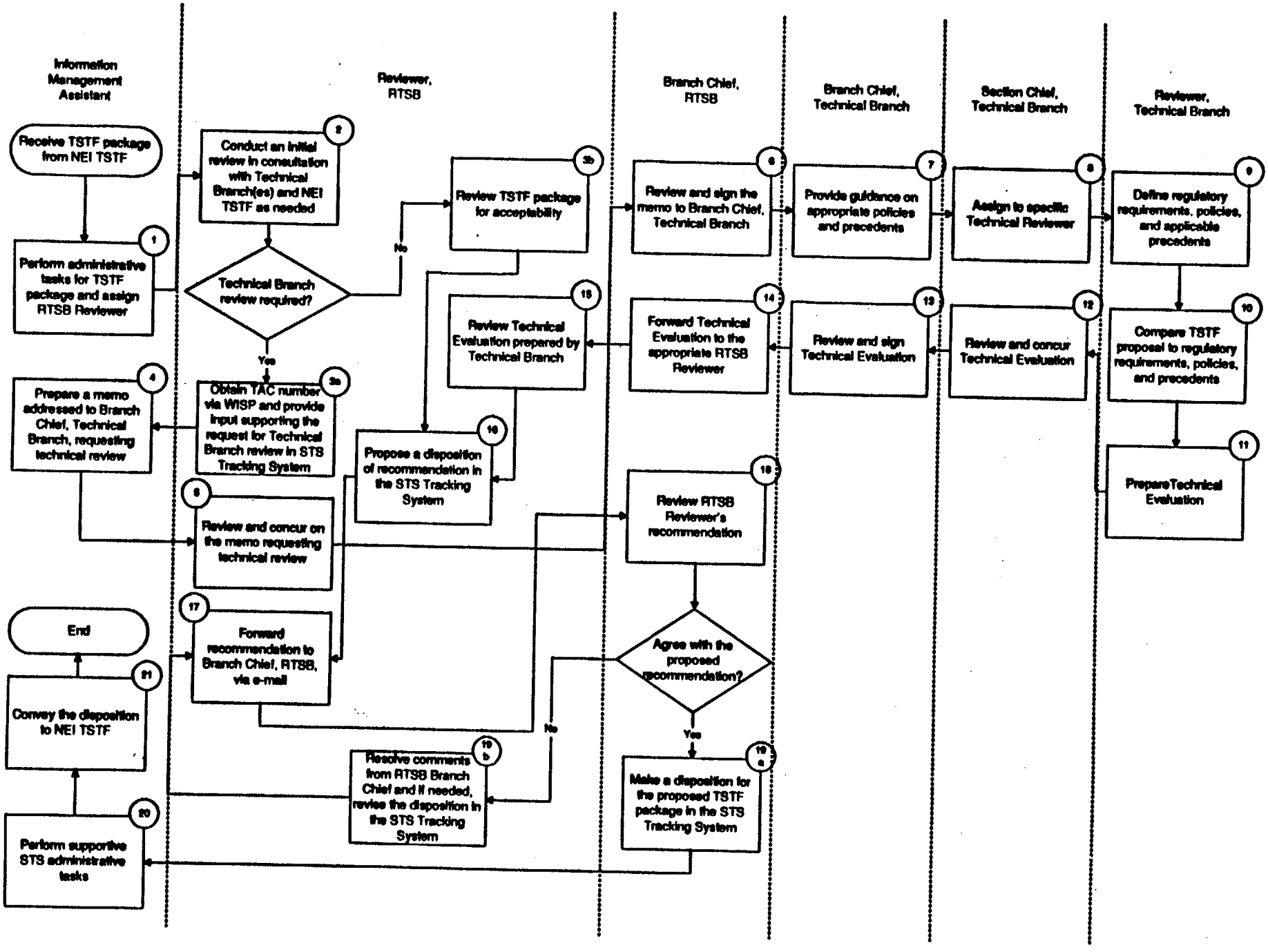
Generic Change Development Process

- Potential Generic Change Identified by Licensee
- Propose Change to ITS NUREG Through Owners Group TSTF Representative
- Change Reviewed by Owners Group and TSTF
- Submitted to NRC Technical Specification Branch
- NRC Approved Changes Made Available via NRC Webpage

Adopting Generic Changes

- Verify Change Justification Applies
- License Amendment Submittal
  1. Reference generic change justification
  2. Note plant specific differences
  3. Avoid deviation from generic change
  4. Provide plant specific justifications for deviations
  5. Reference generic change on TS mark-up pages
  6. Adopt multiple generic changes in submittal
  7. Use No Significance Hazards Consideration Guidance

Technical Specification Task Force (TSTS) Change Review



No Significant Hazards Considerations

- NRC Staff Developing Generic Evaluations For:
  1. Administrative Changes
  2. More Restrictive Changes
  3. Relocation of Requirements
  4. Less Restrictive Changes - Removing Detail
  5. Relaxing LCO Requirements
  6. Relaxing When LCO May Apply

7

No Significant Hazards Considerations (con't)

- NRC Staff Developing Generic Evaluations For:
  7. Relaxing Required Action Completion Times
  8. Relaxing Required Actions
  9. Deleting Surveillance Requirements
  10. Relaxing Surveillance Acceptance Criteria
  11. Changing Surveillance Frequency

8

Approving Plant Specific Changes Before Generic Changes are Approved

- Nuclear Safety Issues
- Dose Reduction
- Operational Necessity (avoiding unnecessary shutdown or power reduction, or restart operations)
- Exigent or Emergency Circumstances (10 CFR 50.90)

9

Non-ITS Converted Plants

- May use ITS NUREG Change Justification to Assist in Developing Plant Specific Justification
- Must Consider
  1. Specific format and content of ITS
  2. ITS word usage and definitions
  3. ITS notation conventions
  4. Use of expanded bases in ITS
  5. ITS Section 3.0 Limiting Conditions for Operation

10

CONSOLIDATED LINE ITEM IMPROVEMENTS

- Process like Generic Technical Specification Change
- Must be applicable to multiple plants
- Submitted by Industry Group with technical justification for change
- NRC publishes description, Safety Evaluation, preliminary NSHCD, and preliminary EA for 30 day public comment period

11

CONSOLIDATED LINE ITEM IMPROVEMENTS (con't)

- NRC publishes availability of change for specific period (typically 90 days)
- Not restricted to plants with Improved Standard Technical Specifications
- Submittal relies on SE, preliminary NSHCD, and preliminary EA, and addresses plant specific conditions
- Individual Federal Register Notices Required
- Individual Amendments Required

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EXAMPLE:

WOG & CEOG Submittals to Eliminate PASS Requirements

- WOG submittal dated October 26, 1998
- CEOG submittal dated May 5, 1999
- Staff has reviewed both submittals
- Public comment period has closed
- NRC addressing public comments
- Approval expected within next several months

USE OF ELECTRONIC MEDIA

Provide NRC with Electronic Copy of License Submittals

- Information made available to the NRC quicker
- Preparation of Notices, Safety Evaluations, Amendments easier
- Information posted on ADAMS for easier access
- NRC working on Policies for Electronic Information Exchange - Voluntary Participation

Electronic Information Exchange (EIE)

- Must register to become Electronic Trading Partner
- NRC is reviewing the surety levels required for submitted documents to establish the requirements for handling them in electronic form.
- Rulemaking will be initiated to Allow Electronic Filing (expected July 2000)
- NRC will be responsible for distribution
- Externally generated documents will be distributed using ADAMS software.

Electronic Information Exchange (EIE) (con't)

- Distribution outside the NRC, either electronic or paper form depending on the recipient
- Very large documents would be submitted via the U.S. mail on CD-ROM (larger than 2 MB)
- Smaller documents, the majority, would be submitted electronically via NRC's EIE program at our web site
- NRC's current plan is to accept documents in PDF, MS Word, and Word Perfect formats

AGENCYWIDE DOCUMENTS

ACCESS & MANAGEMENT SYSTEM

(ADAMS)

DEFINITION OF ADAMS

The policies, processes, and software tools to manage unclassified, official program, and administrative records of lasting business value to the NRC in an electronic rather than paper-based environment

IMPORTANCE OF ADAMS

- The NRC will achieve productivity gains
- Improve communication within the NRC and with licensees and other stakeholders
- Make public documents available to the public via the Internet
- Submittals to the NRC can be in electronic form via the internet

WHAT WILL ADAMS CHANGE

- Voluntary electronic submission of documents from the NRC stakeholders
- Electronic distribution of documents
- The electronic image of the document will be the official agency record
- Electronically route, assign, concur in documents, and track status
- Retrieve full text and images of documents from electronic repository

BENEFITS OF ADAMS

- Improved integrity of information
- Faster, broader access to documents
- Streamlined concurrence; Improved tracking
- Security/access control
- Eventual elimination of paper copy
- Documents available much faster
- Reduced information management costs

IMPLEMENTATION STRATEGY

There will be a phased deployment of users and system capabilities that has already begun

Licensing Workshop - Safety Evaluations

Fred Lyon, USNRC

NRC STAFF SAFETY EVALUATION (WHAT, WHY, WHO)

- Nearly every action affecting an operating nuclear power plant involves consideration of the impact of that action on public health and safety and the environment.
- Consideration involves preparation of a documented evaluation of the potential affect of that action on the safety of facility operation and the environment, known as an NRC staff safety evaluation (SE).

2

NRC STAFF SAFETY EVALUATION - continued

- Preparation of SEs (with or without technical input) is the responsibility of the PM.
- The SE should provide sufficient information to explain the staff's rationale for its response to someone unfamiliar with the requested licensing action (eg the Public)

3

NRC STAFF SAFETY EVALUATION - continued

- SEs should be prepared in response to requested licensing actions, to delineate the technical, safety, and legal basis for the NRC's disposition of a requested licensing action, or NRC staff initiative.
- SEs play an important part in building internal NRC consensus/policy.

4

LEGAL FINDINGS

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by dated , complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

5

LEGAL FINDINGS- continued

B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;

C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

6

LEGAL FINDINGS- continued

D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

7

LEGAL FINDINGS- continued

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. is hereby amended to read as follows:

8

LICENSE AMENDMENT SE CONCLUSIONS

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure.

9

LICENSE AMENDMENT SE CONCLUSIONS - continued

The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (citation and date). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

10

LICENSE AMENDMENT SE CONCLUSIONS - continued

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

11

CAN THE NRC/LICENSEES DO WITHOUT NRC STAFF SAFETY EVALUATIONS?

- Why not just present conclusions/legal findings?
- Would any licensee be satisfied with conclusions/legal findings (only)?
- If not, why not?

12

ORGANIZATION/CONTENTS OF A GOOD NRC STAFF SE

- INTRODUCTION
- BACKGROUND
- DISCUSSION
- EVALUATION

13

CONTENTS OF A GOOD NRC STAFF SE - continued

- TECHNICAL SPECIFICATIONS (IF APPLICABLE)
- ENVIRONMENTAL CONSIDERATIONS
- CONCLUSIONS (LEGAL)

14

INTRODUCTION

Provide a brief description of the requested licensing action. Discuss pertinent reference material (i.e., date(s) of application and any supplements, the name of the licensee, the name of the facility, and the associated docket number(s) and license number(s)). This section typically is only one or two paragraphs. Also, address the impact of supplements on "No significant hazards" findings (if applicable).

15

BACKGROUND

Provide the regulatory framework for the requested licensing action. Include a summary of relevant regulations, regulatory guides, generic letters, or NRC staff positions. If applicable, describe the structure, system, or component affected by the requested licensing action and associated design bases. Additionally, this section may include a summary of the licensee's rationale for the requested licensing action.

16

BACKGROUND - continued

LAW AND REQUIREMENTS

- ATOMIC ENERGY ACT
- TITLE 10 CODE OF FEDERAL REGULATIONS (10 CFR)
- SPECIFIC PART (eg 10 CFR PART 50)
- SECTION (eg 10 CFR PART 50, SECTION 50.46)

17

BACKGROUND - continued

GUIDANCE

- STANDARD REVIEW PLAN (eg SRP 6.3)
- REGULATORY GUIDES (eg RG 1.157)
- CODES, STANDARDS, ETC

18

DISCUSSION

This section provides a description of those analyses undertaken by the licensee in support of the application under review. Discusses the potential impacts of the action on the continued safe operation of the facility.

19

EVALUATION

This section provides the basis for the NRC staff approval/denial of the action, referencing relevant regulatory criteria and guidance documents where appropriate. A summary paragraph emphasizing the basis for the approval/denial is generally appropriate. Environmental considerations may be included in this section if little or no environmental impact is anticipated. Otherwise, a separate environmental evaluation may be required.

20

TECHNICAL SPECIFICATIONS (IF APPLICABLE)

Each change to the Technical Specifications should be individually addressed including the basis for acceptability. The author may choose to reiterate the basis if contained in the Discussion/Evaluation

21

ENVIRONMENTAL CONSIDERATIONS

- The licensing action is Categorically Exempt (Boiler Plate)
- The NRC staff provided an Environmental Assessment and a Federal Register Notice citation is given

22

CONCLUSION

Present the staff's conclusions regarding the possible safety impact of the proposed action on continued facility operation (boilerplate). The results of the evaluation in the discussion section must support the conclusion.

23

INTERNAL NRC CONCURRENCE

- Technical Concurrence required if PM prepares the SE
- Role of concurrence in consensus building
- Role of the Office of the General Counsel

24

ENFORCEMENT STATUS OF SE

- The SE is not an "enforceable" document
- The NRC staff may choose to issue an Order to create enforceable conditions (eg license condition)
- The licensee may choose to amend their application to include enforceable conditions
- The NRC staff should not make any representations in the SE that are in excess of those provided by the licensee in the licensee's application

25

LICENSEE INTERACTION WITH NRC STAFF

- Review all NRC SEs for accuracy
- Demand high quality including a full description of the basis for NRC staff acceptance/denial
- Communicate promptly with the NRC staff if there is a problem
- Request a supplemental SE if necessary

26

WORK CONTROL CENTER

Claudia Craig

OBJECTIVES

- Efficiently and effectively manage NRR's workload
- Maintain quality
- Provide clear expectations and accountability
- Provide up to date, accessible, workload info for PBPM
- Reduce process variances
- Allocate and track workload

EXPECTATIONS

- Better prediction of workload
- Better prediction of resources required
- Better response to emergent work
- Better identification of impacts from emergent work

OVERVIEW

- Centralized issuance of TACs
- WISP to be replaced
- Work assigned and scheduled by the WCC to branch level based on resource pool
- First line supervisors assign work to individuals
- Pilot process began February 22

Risk-Informed Regulatory Activities

Risk-informed Regulation

PRA results/insights + deterministic insights

SECY-95-126
NRC Policy Statement on use of PRA

- PRA should be used in regulatory matters to the extent supported by the state of the art
- PRA should be used to reduce unnecessary conservatism
- PRA evaluations should be as realistic as possible
- PRA uncertainties need to be considered in applying Commission's safety goals

Major Areas of Risk-Informed Regulation

- Licensing
- Inspection
- Enforcement
- Performance Assessment

Significant Licensing Documents

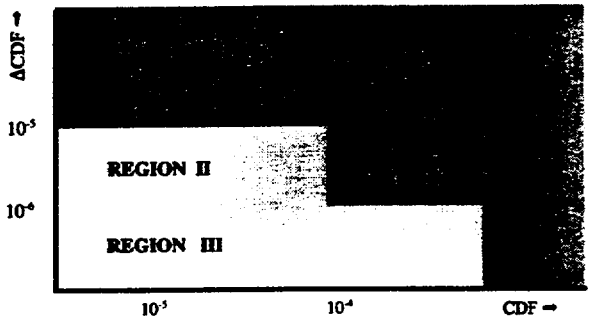
- RG 1.174 Changes to licensing basis
- RG 1.175 Inservice Testing
- RG 1.176 Graded Quality Assurance
- RG 1.177 Technical Specifications
- RG 1.178 Inservice Inspection

Principles

Risk-informed Integrated Decisionmaking

- Meets current regulations
- Defense-in-depth
- Maintain safety margin
- Increased CDF or risk is small
- Monitoring

RG 1.174 Figure 3



Acceptance Guidelines for Core Damage Frequency (CDF)

Risk-Informed Licensing Action

...any activity that uses risk assessment insights or techniques to provide a key component for determining acceptability of the proposed action

Risk-Informed Licensing Actions

- Special administrative handling
  - Unique identifier
  - Priority 2
  - Management review
- Technical review
  - Traditional deterministic review
  - Assessment of strengths and weaknesses of risk evaluation
  - Balance between deterministic and risk components

Risk-Informed Licensing Actions

- Most common types
  - Diesel generator allowed outage time extension
  - ECCS allowed outage time extension
  - Risk-informed ISI, IST
- Statistics
  - Total RILA: ~110
  - Approved to date: ~70
  - Withdrawn: 16

Management Oversight

- Risk-Informed Licensing Panel
- Resolution of conflicts
- Improved timeliness and efficiency

Risk-Informed Technical Specifications

- LCO required action end states
- Mode change flexibility
- Missed surveillances
- Risk-informed completion times
- LCO 3.0.3
- Operability definition
- Surveillance requirements coordinated with Maintenance Rule

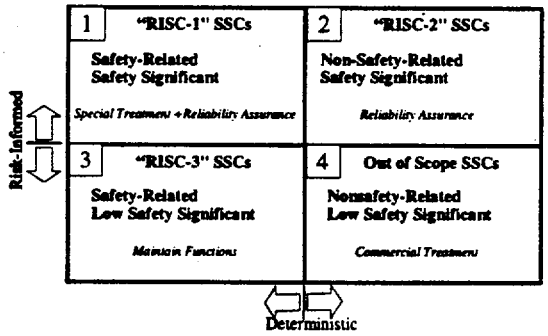
Risk-Informed Part 50

- SECY-98-300: Options for Risk-informed Revisions to 10 CFR Part 50, December 23, 1998
- "Option 1" - Current rulemaking activities
  - 10 CFR 50.59
  - 10 CFR 50.72, 50.73
  - 10 CFR 50.55a

Risk-Informed Part 50 (cont.)

- SECY-99-256, "Rulemaking Plan for Risk-Informing Special Treatment Requirements"
  - Modified scope of SSCs subject to special treatment requirements such as EQ
  - Reduce unnecessary burden for large number of low safety-significant SSCs
  - Pilot plant exemptions: South Texas, others
  - Final rule planned for early 2002

Risk Categorization and Regulatory Treatment



Risk-Informed Part 50 (cont.)

- SECY-99-264, "Proposed Staff Plan For Risk-Informing Technical Requirements in 10 CFR Part 50"
- Office of Nuclear Regulatory Research study underway

Relief Requests: 10 CFR 50.55a

- Criteria
  - Alternatives - would provide an acceptable level of quality and safety
  - Hardship or unusual difficulty - without a compensating increase in level of quality or safety
  - Impractical - design, materials, access limitations [IST: 50.55a(f)(6)(i); ISI: 50.55a(g)(6)(i)]
  - Augmented - may be required, in conjunction with "impractical" relief if:
    - Added assurance of operational readiness is needed (IST)
    - Added assurance of structural reliability is needed (ISI)

9

Relief Requests: 10 CFR 50.55a - continued

- Content
  - Must accurately cite specific Code requirement
    - Edition, Addenda
    - Section, Subsection, and Paragraph
  - Must accurately cite specific provision of regulations
    - Alternatives, hardship, or impractical
  - Identify or list applicable components, systems, structures, welds
  - Clear/concise basis for each relief or alternative
  - Describe hardship in detail, fully explain impracticalities
  - Provide drawings where clarity in request is helpful
  - References to earlier submittal for current 10-yr interval

10

Notice of Enforcement Discretion

- Content (Policy – Inspection Manual 9900, 6/29/99)
  - Tech Spec or License Condition to be violated
  - Description of events leading to request
  - Safety basis: evaluation of significance and potential consequences
  - Basis that noncompliance will not be detrimental to public health and safety and does not involve a USQ or significant hazard consideration
  - Basis that noncompliance will not involve adverse consequences to environment

16

Notice of Enforcement Discretion - continued

- Content (con't)
  - Identify compensatory measures, actions taken to avoid noncompliance, actions to avert/alleviate the emergency
  - Justify duration of of noncompliance
  - Approval of appropriate review committee
  - For plant startup: must meet one of three criteria
  - Severe weather requests covered by NRC AL 95-05, Revision 2

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Notice of Enforcement Discretion - continued

- Region Issues NOED for noncompliance
  - Of short duration (<=14 days) from limits of function specified in LCO
  - With an action statement time limit
  - With a surveillance interval or one-time deviation from surveillance requirement
  - When time is too short to process an emergency amendment
- NR Issues NOED for noncompliance
  - With LCO until LCO can be revised by amendment
  - With action statement time limit until license amendment issued to make temporary or permanent
  - With surveillance interval or change to surveillance by license amendment

18

Notice of Enforcement Discretion - continued

- Timing
  - Must not abuse requirements of 50.91(a)(5)
  - Oral request must be followed by written request w/in 24 hours
  - NRC Approval letter to be issued w/in 2 working days
  - Region issued NOED not to exceed 14 days
  - Exigent TS amendment request, if appropriate, w/in 48 hours
  - Exigent amendment issued w/in 4 weeks
- References
  - NRC Administrative Letter 95-05, Revision 2
  - NRC Inspection Manual Part 9900, NOEDs, 6/29/99
  - NUREG-1600, NRC Enforcement Policy

19

SUMMARY OF FEEDBACK FROM THE NRC/NMC LICENSING WORKSHOP

The following is a summary of the written feedback forms distributed to workshop participants.

Participants were asked to rate the workshop on a scale of 1 (unsatisfactory) to 10 (excellent) in areas such as accomplishment of objectives and coverage and suitability of subject matter. The average rating was 9. The average overall rating for the workshop/materials was 9 and for the presenters/facilitators was 9.

Written comments are summarized below.

- Participants generally appreciated the open and candid discussions between the NRC and licensee staffs and the opportunity to interact with their counterparts at a working level, not only from the NRC, but from the other licensees. Presentations were well-prepared and professional.

- Participants felt that the subject matter was good and relevant to current industry licensing issues. Topics of particular interest were the license amendment process, the task interface agreement process, and the generic technical specification change process. Some presentation material was repetitive and could be eliminated; for example, material from the overall license amendment process discussion overlapped with material from discussions of licensee submittals and safety evaluations.

- Participants generally suggested that similar workshops be held every 1-2 years. Some also suggested that NRC Region staff representation at the workshops may be beneficial.

Some of the questions/concerns expressed to the NRC staff during the workshop are discussed below.

- Clarifications and additional guidance to the license amendment process should be considered for the following questions:

  When in the process should licensees submit marked-up and clean technical specification (TS) pages?

  Should marked-up TS pages be hand-marked or redline/strikeout marked?

  Should the amendment history be annotated on the new TS pages?

  Would it be beneficial for the NRC to provide the attributes of a good submittal to licensees and provide a simple bulletized format?

  How should changes to TS Bases pages be processed?

The staff will consider these comments during the revision process for Office Letter 803, "License Amendment Review Procedures."

ENCLOSURE 4

- Licensees are concerned about the lack of participation they are allowed in the task interface agreement (TIA) process. The staff acknowledges the comments. The TIA process is under discussion by the NRC/Nuclear Energy Institute Licensing Action Task Force.

The staff acknowledges the following comments for consideration:

- NRR representation at the periodic Region Utility Group meetings may be beneficial.

- The distribution lists for NRC documents should be controlled by a single NRC group so that changes to the lists can be efficiently managed and distribution is consistent between different NRC headquarters and regional branches.

- Licensees noted that NRC billing schedule for first quarter fiscal year fees is generally too late for licensees' accounting processes. They need at least an estimate of the fee bills in a more timely manner. They also requested a breakdown of which project manager activities are fee-billable.

- Licensees are uncertain of the level of rigor needed for probabilistic risk assessments used in submittals.

- Licensees are concerned about the short time allowed by the Notice of Enforcement Discretion (NOED) guidance for their written submittal to the NRC following oral approval of the NOED request. They also suggest the definition of the "official" making the determination of a severe weather or natural event emergency be clarified as to whether the "official" must be an elected or appointed government official or may be an official or load dispatcher of the power pool.

- Licensees would generally like to see more stability among NRR project manager assignments in order to promote working relationships and historical knowledge levels.

- Licensees generally appreciated the objectivity of inspection reports in the new inspection and oversight process, even though there are no positive comments in the reports. Some members of the public expressed the desire to see performance indicators addressing primary leakage rate and where any radioactive releases are going in the environment.

March 14, 2000

LICENSEES: Northern States Power Company
Wisconsin Electric Power Company
Wisconsin Public Services Corporation
IES Utilities, Inc.

FACILITIES: Monticello Nuclear Generating Plant
Prairie Island Nuclear Generating Plant, Units 1 and 2
Point Beach Nuclear Plant, Units 1 and 2
Kewaunee Nuclear Power Plant
Duane Arnold Energy Center

SUBJECT: MEETING SUMMARY FOR THE NRC/NMC LICENSING WORKSHOP, MARCH 7-8, 2000 (TAC NO. MA6843)

The Nuclear Regulatory Commission (NRC) and utilities comprising the Nuclear Management Company, LLC (NMC) jointly sponsored a licensing workshop March 7-8, 2000, in Hudson, Wisconsin. Attendees included staff of the NMC member utilities and the NRC, a representative of the State of Minnesota, and members of the public. The objectives of the workshop were to improve the quality of licensing submittals, promote understanding of NRC processes, enhance the regulatory interface, and establish better working relationships.

Representatives from the NRC Division of Licensing Project Management presented information on the role of the project manager and the licensing assistant, regulatory processes, and the status of initiatives such as electronic information exchange and risk-informed licensing actions. Utility representatives presented the status of NMC formation activities and feedback on the revised NRC inspection and oversight process. The agenda, a list of attendees, copies of the slides used at the workshop, and a summary of the feedback received from workshop attendees are enclosed.

No regulatory decisions or commitments were requested or made during the meeting.

/RA/

Carl F. Lyon, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-263, 50-282, 50-306, 50-266, 50-301, 50-305, 50-331

Enclosures:
1. Agenda
2. List of Attendees
3. Presentation Slides
4. Summary of Feedback

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