Mid-Atlantic Utilities/

NRC

PECO ENERGY

Licensing Workshop

May 2 - 3, 2000

Valley Forge Hilton,
251 DeKalb Pike
King of Prussia, PA

Enclosure 1

Agenda & Participants List

2	Opening
3	Overview of Office Letter 803
4	Break Out - Management Expectations
5	NEI - LATF Initiatives
6	Break Out - Quality Products
7	Relief Request & Code Alternatives
8	NRC Considerations for Electronic Communication Tools
9	Break Out - Effective Working Relationships
10	Feedback Form

MID-ATLANTIC UTILITIES LICENSING WORKSHOP
MAY 2 - 3, 2000

A G E N D A

May 2, 2000		
Time	**Subject**	**Leaders**
8:30 - 9:00	**Continental Breakfast**	
9:00 - 9:15	Welcome	G. Rombold/T. Colburn
9:15 - 9:30	Opening	J. Hutton/J. Clifford
9:30 - 9:45	Introductions	G. Rombold/J. Clifford
9:45 - 10:15	Overview of Office Letter 803	T. Colburn
10:15 - 10:30	**Break**	
10:30-11:45	Breakout Session - Management Expectations	M. Laggart/R. Fretz
11:45 - 1:00	**Lunch**	
1:00 - 1:30	Breakout Session Report Out (Feedback)	M. Laggart/R. Fretz
1:30 - 2:15	NEI LATF Initiatives - Revised NRC SER Process from Feb. 17 Public Meeting	M. Schoppman
2:15 - 3:00	Breakout Session -Quality Products (including critique of examples) Attributes of quality submittal/quality NRC SER	R. Schaaf/D. Distel
3:00 - 3:15	**Break**	
3:15 - 4:00	Breakout Session -Quality Products (including critique of examples) Attributes of quality submittal/quality NRC SER cont.	R. Schaaf/D. Distel

MID-ATLANTIC UTILITIES LICENSING WORKSHOP
MAY 2 - 3, 2000

A G E N D A

May 3, 2000		
Time	**Subject**	**Leaders**
8:00 - 8:15	**Continental Breakfast**	
8:15 - 8:45	Relief Requests and Code Alternatives	A. Dromerick
8:45 - 9:15	NRC Considerations for Electronic Communication Tools	R. Ennis
9:15 - 9:30	**Break**	
9:30 - 11:00	Breakout Session - Attributes of Effective Working Relationships Between Licensees and NRC PMs	G. Rombold/H. Pastis
11:00 - 12:30	**Lunch & Checkout**	
12:30 - 1:30	Breakout Report Out Effective Relationships (Feedback)	G. Rombold/H. Pastis
1:30 - 1:45	Workshop Feedback - Review any Action Items	G. Rombold/J. Clifford
1:45 - 2:00	Closing	J. Clifford

MID-ATLANTIC UTILITIES/NRC LICENSING WORKSHOP

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Mid-Atlantic Region Licensing Workshop

Jim Clifford
Chief, Projects Section I-2

Licensing Workshop Objectives

- Enhance regulatory interface
- Promote understanding of entire licensing process
- Generate proposals for change
- Improve licensing submittal quality
- Improve safety evaluation quality
- Exchange information on current topics of interest

OBJECTIVES

- Improve the business relationship between the NRC NRR Project Managers and their Utility counterparts (George Rombold)
- Leads to more effective use of available licensee and staff resources

NRC Attendees

- Tim Colburn - TMI 1
- Bart Buckley - Limerick /Peach Bottom
- Alex Dromerick - Calvert Cliffs
- Rick Ennis - Hope Creek
- Helen Pastis - Oyster Creek
- Bob Schaff - Susquehanna
- Elinor Adensam - Director, PD I

Goals of Improved Licensing Performance

- Budget and resource challenges
- Operating plan goals
- Efficiency and Effectiveness
- Faster response to licensee needs
- Need for more stable regulatory environment

Benefits of Improved Submittals

- **SIMPLIFY** -- Reduce extent and duration of interactions between reviewer and requester (reduce RAIs, supplemental submittals)

- **MAXIMIZE** -- NRR review assets (schedule control, labor rate, use of precedents)

- **REDUCE** -- Actions rejected or withdraw
  -- Cost

Preview of Closing Session Feedback Areas

- Was workshop effective in meeting objectives?
- What parameters can be used to assess licensing submittal quality?
- What lessons learned can you integrate into your routine licensing practices?
- Suggestions for improving communications at NRC-licensee interface?
- Need for follow-on workshops?

OFFICE LETTER 803, REV. 3

TIMOTHY G. COLBURN

NRC/Mid-Atlantic Utilities
Licensing Workshop
May 2 - 3, 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?
- TS pages (if applicable)

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
  - Immediate action required for complaince with statutory requirements or Commission directives

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 safety 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 (final NSHCD, NRR Office Director concurrence and Commission notification required)
- 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
  - State consultation for EA before publication

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 bi-weekly FR

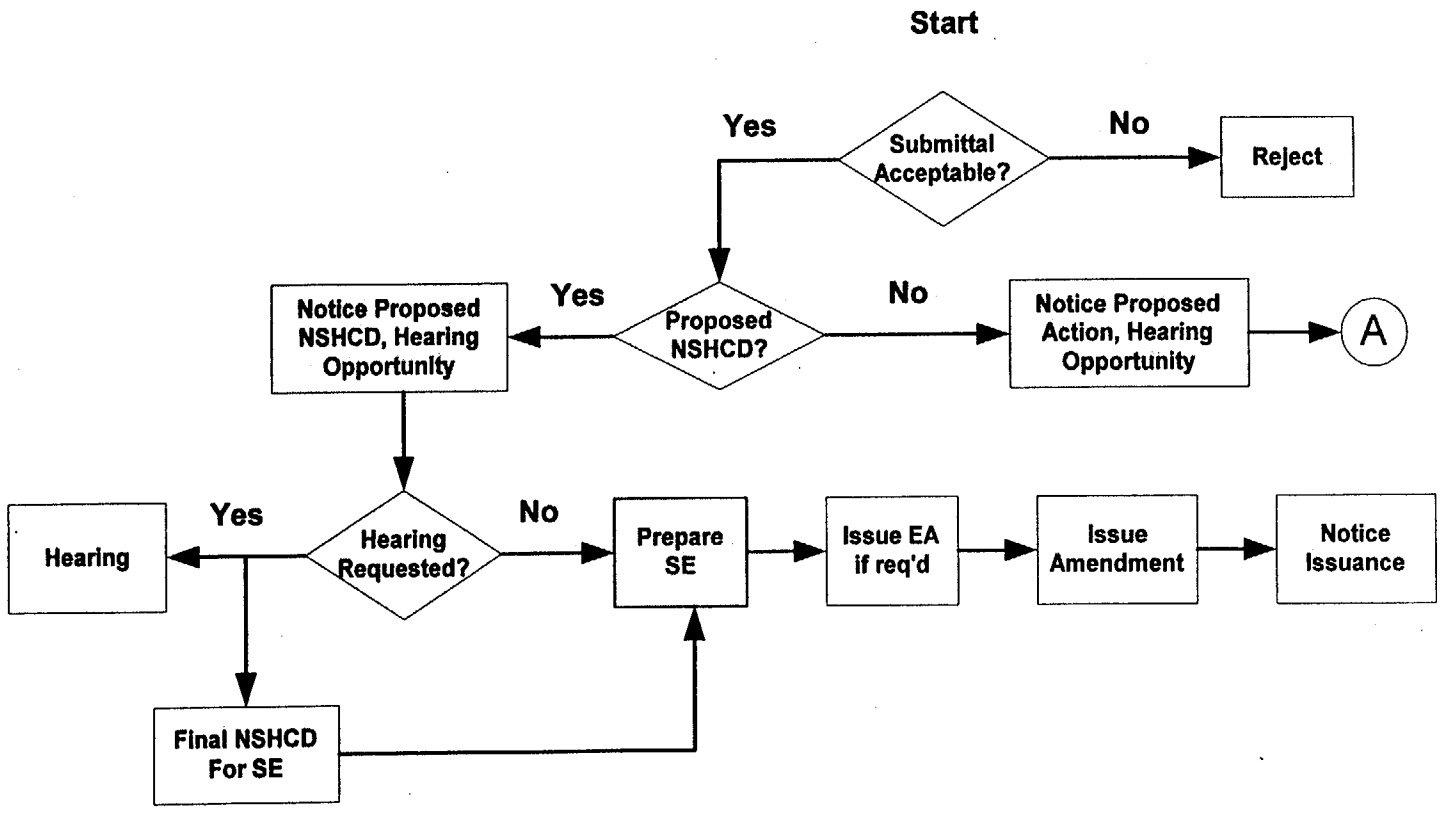
- Notice in local media if amendment needed after 6 but before 15 days
  - Repeat in bi-weekly FR notice

- The NRC must make a final NSHC determination for each amendment

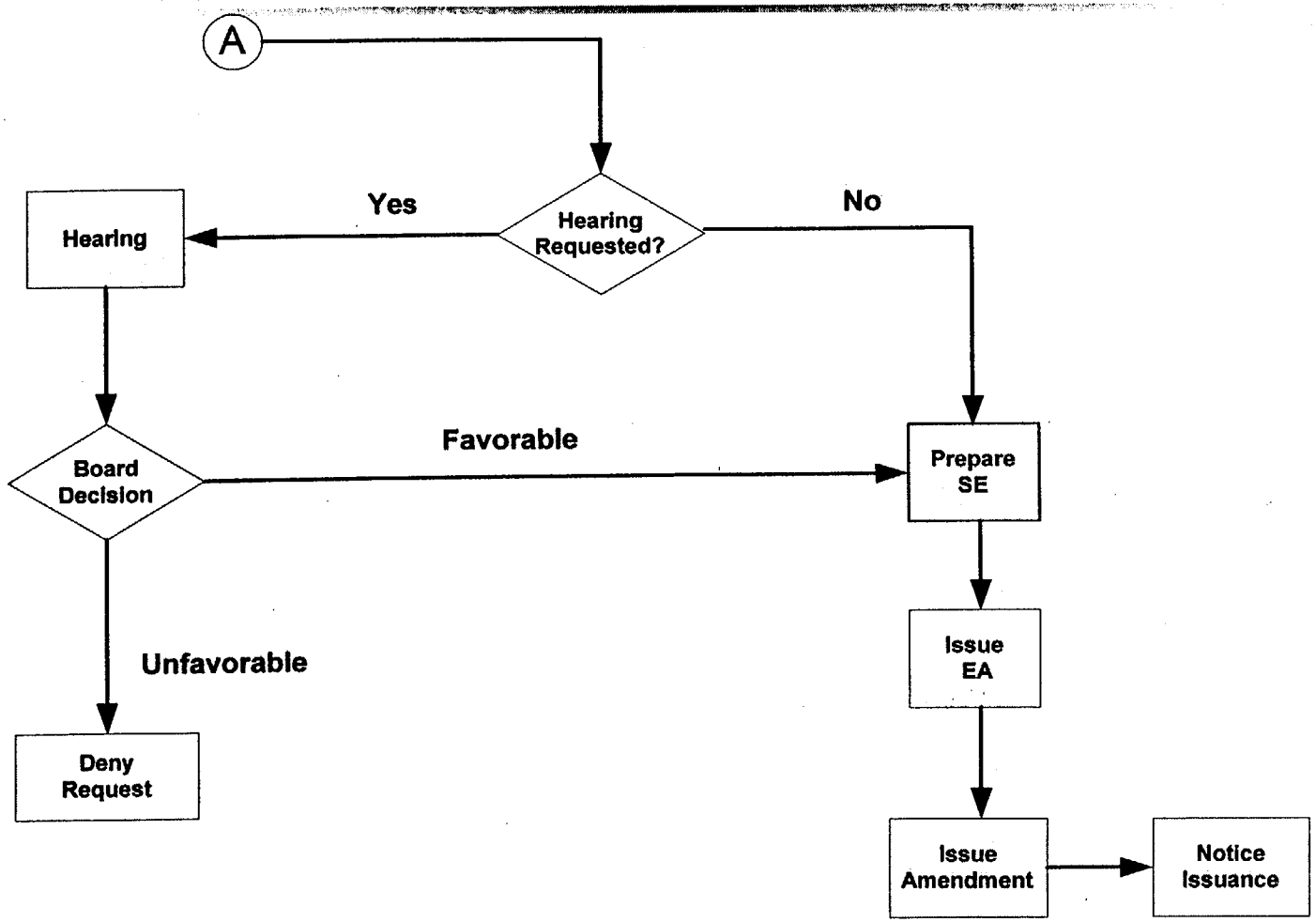
Noticing - Emergency Amendment

- 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 improve Standard Technical Specifications (ISTS) guidance
  - Conformance to precedents
  - Resource availability & schedule needs

Reviewer 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

Reviewer 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 - commitments must be in writing
  - 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 based upon licensee written commitments in application.
- 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
  - After final NSHC determination has been made 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 (usually biweekly)

REFERENCES

- NRR Office Letter 803, Rev. 3
- 10 CFR 50.30 (Applications)
- 10 CFR 50.90 (Amendment & Applications)
- 10CFR 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)

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May 2 – 3, 2000

Nuclear Regulatory Commission
NRR/DLPM
Management Expectations

NRR Management Expectations

- Licensing Actions Goals:
  - Complete 1,500 Licensing Actions in FY 2000
  - Approximately 375 to be completed by DLPM Staff/Project Managers.
  - Total inventory = 600 by end of FY 2000
  -
    - ★ Based upon receiving approximately 1,400 licensing action requests from licensees.

NRR Management Expectations

- Licensing Actions Goals:
  - Achieve an inventory age distribution:
    - 95% < One year old
    - 100% < Two years old

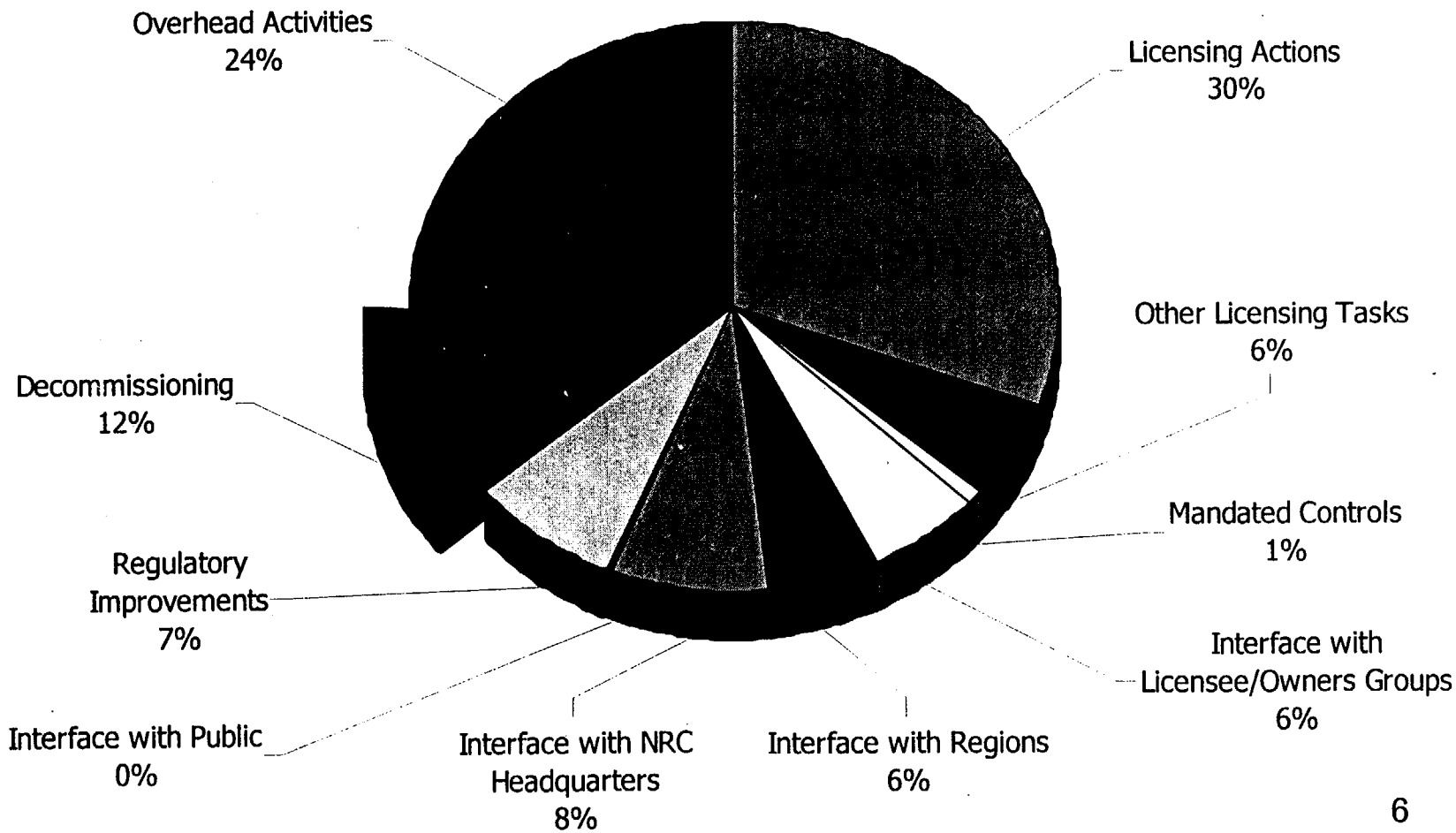
NRR Management Expectations

- Licensing Actions Goals:
  - Number of completed actions in FY 2000:
    - License Amendments = 1,070
    - Relief Requests = 240
    - Exemptions = 80
    - QA Plan Changes = 75
    - Other Types = 35

NRR Management Expectations

- Other Licensing Actions/Activities:
  - Notices of Enforcement Discretion (NOEDs) are processed in a timely manner.
  - Responses to 10 CFR 2.206 Petitions are completed within 120 days, are technically accurate, and address petitioner's concerns.
  - FOIA requests are handled IAW directives.
  - Other PM activities……

NRR Project Manager Functions



NRR Management Expectations

- Licensees should…
  - Prepare high-quality submittals to NRC
  - Plan ahead where possible – help manage licensing action "pipeline"
  - Provide site priorities to PM with realistic due dates
  -

NRR Management Expectations

- Higher quality submittals will result in:
  - Quicker NRC response to licensing request
  - Reducing unnecessary RAIs, which often extends review time (and is more costly to licensee)
  - Allows more reviews to be performed by PM, with more complex submittals to NRR technical staff
  - Intangibles –
    - Increases NRC confidence in licensee
    - Others?

NRR Management Expectations

- What are the barriers to improving the quality of submittals to the NRC?
  - Standardization?
  - Communication?
  - Staff Experience?
  - Understanding Regulatory needs?
  - Site culture?
  - Other?

Management Expectations Breakout Session

- NRC Management
  - Expectations
    -
    -
    -
    -
  - Barriers
    -
    -
    -
- Licensee Management
  - Expectations
    -
    -
    -
    -
  - Barriers
    -
    -
    -

MANAGEMENT/LICENSEE EXPECTATIONS/BARRIERS - "Make It Happen"

Licensing Engineer

- Be proactive internally/externally - pull information needed; don't wait for information.
- Standardization helps OGC.
- Submittal bases - clearly stated.
- Make sure priorities are real.
- Reference precedent - provide basis linking precedent to application.
- Use specific descriptions of "meeting intent," describe extent "evaluation."
- Identify deviations from SRP Guidance - relate to your Licensing Basis.

Barriers

- Oscillating priorities
- OGC review of amendments
- OGC priorities different
- Over reliance on precedent quality of submittal suffers.
- Submittal meets intent - but there are subtle differences, in-exact language.

Project Manager

- Improve internal communications.
- Daily accounting for contingency planning.
- OGC review required in all cases - identify precedents and scope (SRP)
- Facilitate discussion with technical staff and OGC (need quality submittal/SER).
- Flexibility to hold reviews.
- NRC Reviewers using SRP Guidance; slows review.

Barriers

- Changing priorities.
- Lack of standardization.
- Lack of contingency planning.
- Over-reliance on precedent quality of submittal suffers.

Licensee Management

Expectation

- Prevent unnecessary impact on plant operation.

Barriers

- Ineffective communications.
- Timely identification of need for licensing action.
- Understanding industry issues, precedents, options.
- Timely identification of input required from NRC Staff (to facilitate approval).
- Potential impacts of deregulation.

Expectation

Licensing action has value (cost/benefit)

Barriers

- Good comparison of benefits vs. all costs.
- Thorough evaluation of options (Chevy vs. Cadillac)
- Inadequate knowledge of industry activities, precedent, etc.

Expectation

High quality submittals, optimizing cost and effort.

Barriers

- Lack or early dialogue.
- Inadequate knowledge of, or expression of what submittal is requesting.
- Understanding of NRC's Method of Review (i.e., SRP)
- Lack of understanding by Engineering Department/Technical Staff.

Expectation

- Meet timeliness goals.

Barriers

- Priority accuracy/communication
- Realistic dates requested
- Administrative support
- Timely submittal (lead time)
- Quality submittal
- Early discussions/meeting

Expectation

Communicate about pipeline to prevent surprises.

Barriers

- Key personnel turnover.
- Ineffective working interface/relationships.
- Understanding industry issues.

Licensee Expectations

1) 100% issuance of amendments by when the licensee needs it, (e.g., RFO Restart Requirement).

2) Need flexibility with changing priorities.

3) Consistent application of standards/precedents.

4) Accurate submittal status reporting

5) Timely communication of submittal issues prior to RAIs, etc.

Barriers

1) NRC goal not related to customer requirements.

1a) NRC/Licensee unfamiliar with each others scheduling and resource constraints (e.g., outage schedules, staff experience levels, competing priorities).

2) Changes in NRC staff impact utilization of standards, precedents (re-education factor).

3) Project Manager/Reviewer rotation.

NRC Expectations

1) Issue letter - 30 days

2) Expects notification of future work to plan appropriately.

3) Appropriate justification (burden, safety, precedent).

4) Appropriate references for justification.

Barriers

1) Quality of licensee submittal.

3) Changes in utility priorities occur - causes change in NRC work - NRC position first in, first out) (license transfer)

Communication Goals

- Licensing outage needs
- NRC Business Plan

Expectations

- Schedules
- Identify precedents
- Complete submittal

Barriers

- Regular knowledge (supplements needed)
- Identify "hard spots" in non-precedent submittal.
- Need to docket draft information.
- Process to learn from early "generic" submittals.
- Openness in presubmittal communications.
- Hold up plant-specific for generic issue.
- Regulatory knowledge (commitments)
- Lessons Learned NRC CA program

Solutions

- Strawman proposal for pre-meeting.
- Issue plant specific with condition RE: Generic.
- Clear writing techniques
- Provide feedback to foster improvement
- Database of "Good" submittals.

Mid-Atlantic Utilities/NRC Licensing Workshop May 2-3, 2000

Management Expectations Industry

Management Expectations Licensing Dept.

- Rely on Licensing for Strategic Advise
  - Analysis of Options
  - Licensing History
  - Precedents / New Developments
- Knowledge of Current & Upcoming Issues

Management Expectations Licensing Dept.

Submittals

- Technically Adequate, Accurate and Complete Submittal
  - Goal Should Be "0" RAIs From NRC
- Research proposed submittals
  - Previous Industry Submittals
  - NRC Expectations

Management Expectations Licensing Dept.

Submittals

- Project Manager of the Submittal
  - Make it happen
  - Integral Part of Team to Complete Effort
  - Resolve Internal Comments in Fair and Even Handed Manner
- Review By Stakeholders

Management Expectations NRC & Licensing Dept.

Schedules

- Must Be Realistic and Dependable
- True Appreciation of Priorities
- Meet Published and Agreed Upon Schedule
- Frequent Communication Regarding Progress
- Changes Need to Be Discussed ASAP
- Involvement of Senior Management if Necessary

Management Expectations NRC & Licensing Dept.

Communications

- No Surprises-Communicate in Advance
  - Press releases
  - RAIs
  - Eleventh hour information
- Have ALL Issues (Technical, Political, Schedular) on the Table
- Trusting & Professional Relationship

MID-ATLANTIC UTILITIES LICENSING WORKSHOP

Mike Schoppman
NEI Licensing Action Task Force (LATF)
202-739-8011; mas@nei.org
May 2, 2000

NEI

Licensing Action Task Force

- Standardization of Licensing Submittals and SERs (pp. 3-5)
- Unintended Tech Spec Action (pg. 6)
- Consolidated Line Item Improvement Process -- RIS 2000-06 (pg. 7)
- Additional LATF Issues (pg. 8)

NEI

STANDARDIZATION OF LICENSING SUBMITTALS AND SERs

Internal NRC Proposal on SER Format

1. APPLICATION

This safety evaluation addresses (the licensee's) application dated MM/DD/YY, as supplemented MM/DD/YY. (Link document references to ADAMS)

2. PROPOSED CHANGES

The licensee proposed changes to TS X.X.X to reduce the maximum pressurizer water level for pressurizer operability to 57% instead of 61%. (Link document references to ADAMS)

3. PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The staff's proposed no significant hazards consideration determination was noticed in the *Federal Register* (XX FR XXXXX). The licensee's letter dated MM/DD/YY provided clarifications and additional information that were within the scope of the original FR notice. (Link document references to ADAMS)

NEI

SUBMITTALS/SERs (continued)

4. STAFF'S DETERMINATION

The staff has reviewed the licensee's technical and regulatory analyses in support of its proposed license amendment which are described in (cite location) of the licensee's submittal. The staff has determined that the licensee's analyses are complete and address applicable regulatory and design requirements. (Link document references to ADAMS)

The staff finds the proposed TS changes acceptable on the basis of the following:

(a) The licensee's reanalysis has demonstrated that the RCS pressure and the peak pressurizer water volume remain below the design limits.

(b) The pressurizer will not be water solid and no water will flow through the pressurizer safety valves.

(c) The licensee's reanalysis is based on approved codes and methodologies.

(d) The proposed TS changes provide sufficient margin between the setpoint and the UFSAR assumed accident analysis limits.

(e) The licensee's simulator evaluation demonstrates that required operator action can be achieved within the specified time to identify and mitigate the UFSAR design basis accidents.

NEI

SUBMITTALS/SERs (continued)

5. STATE CONSULTATION

(boilerplate) (Link document references to ADAMS)

6. ENVIRONMENTAL CONSIDERATION

(boilerplate) (Link document references to ADAMS)

7. 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. (Link document references to ADAMS)

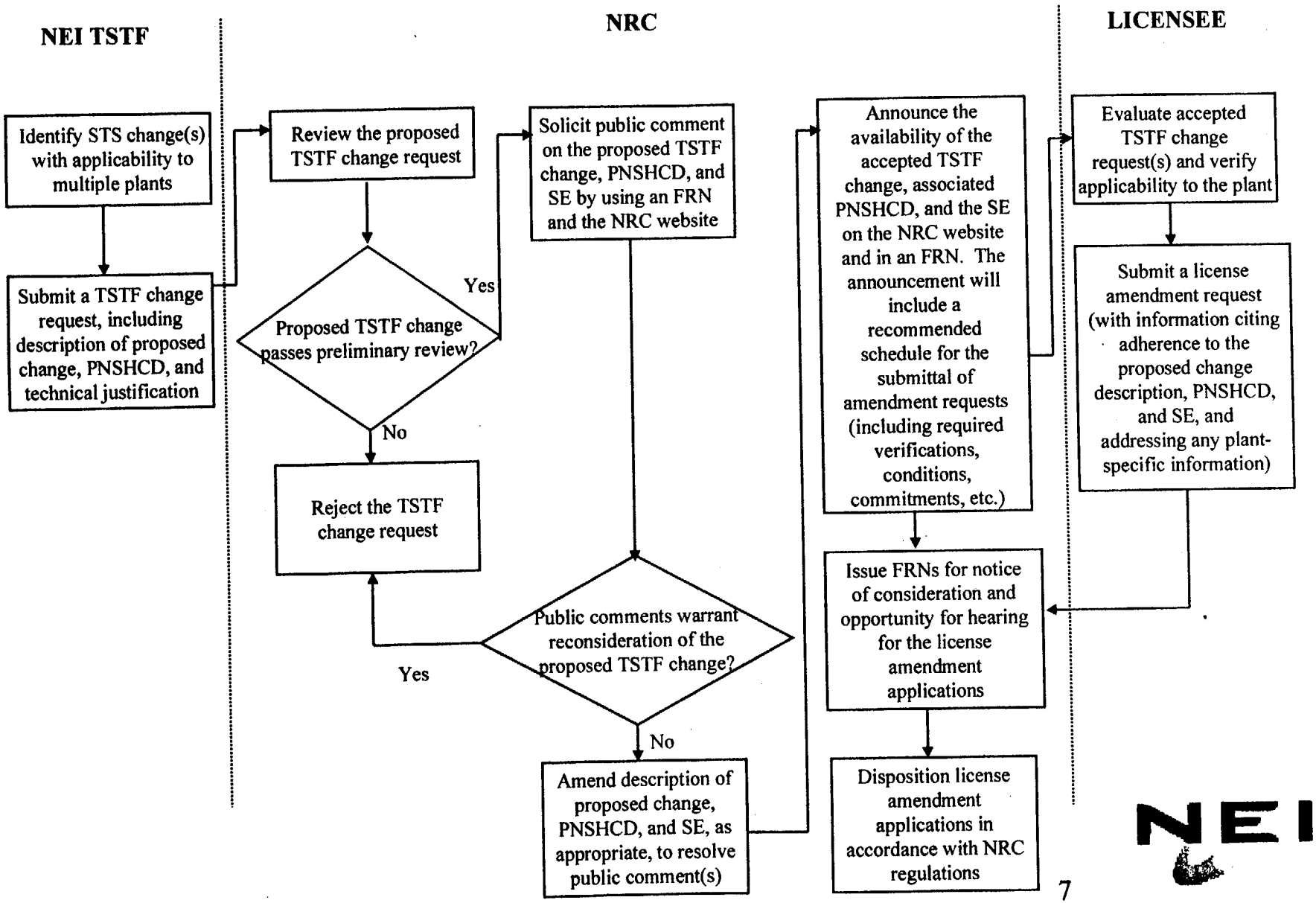
NEI

Unintended Tech Spec Action (UTSA)

- Unnecessary evolution or action that results from an erroneous TS requirement
- Inconsistency between TS and underlying documents in licensing basis
- Preclude need for emergency/exigent change or NOED for minor discrepancies
- Sequoyah pilot submittal August 1999
- NEI UTSA white paper submitted to NRC in March 2000

NEI

Consolidated Line Item Improvement Process (CLIIP) Flow Chart
NRC Regulatory Issue Summary 2000-06



NEI

Additional LATF Issues

- NRR Office Letters (803, 807, 1201)
- Tech Spec Bases Changes
- Other Licensing Submittals (OLS)
- Use of Precedent

NEI

Importance of "High Quality" Licensee Submittals

- Quick response from NRC and better response to plant needs
- Reducing number and complexity of reviews reduces NRC fees and plant operating costs
- Reducing RAI's - Reduces Licensee Workload
- Increased confidence in Licensee's ability to protect safety

Breakout Session - Quality Products

Goals

- Develop Attributes of a Quality Safety Evaluation Report
- Refine List of Attributes contributing to a Quality submittal
- Define NRC and Licensee Actions that will Build-in these Attributes

Breakout Session - Quality Products

Points to Consider

- Purpose of Amendment Safety Evaluation Report
- Purpose of Amendment Application
- Audience for Amendment Safety Evaluation Report
- Audience for Amendment Application (Submittal)
- Role of NRC Project Manager

Breakout Session - Quality Products

Points to Consider (continued)

- Role of Licensing Engineer
- Role of Licensee and NRC Management
- NRC review process and responsibilities - NRC Work Plan, public notification and comment resolution, SE preparation, Staff review and concurrence, amendment preparation and issuance

Breakout Session - Quality Products

Points to Consider (continued)

- Regulatory Requirements
- NRC Staff Guidance Documents

QUALITY PRODUCTS

- Safety Assessment/Safety Analysis "not clearly on Entergy list."
  (see list in Office Letter 803 for examples)

- Importance of NSHC so NRC can "lift" it out for Federal Regulatory Notice.

- Anticipate questions and address them.

  - Review "current" standards, SRP, policy statement, NEI and Regulatory guides, etc.
  - Look at how others got it approved (precedent).
  - Spell out your CLB and how the request affects it.
  - Discuss draft/generic submittal/telecon/meeting (this has political issues).

- How much information is needed to get the approval? Just Right!

- Feedback - RAI should be justified (Office Letter 803).

- Point to sources (e.g., Chapter/Section of UFSAR).

- Does Engineering (technical staff) get final review before submittal (including all attachments).

Quality SERs

- Quality of SER and Submittal
- Document complete rationale (basis) for approvals in terms of Regulatory limits and margins.
- References

Quality Submittals

- More use of physical inspection/observation - plant visit both NRC and Licensee.
  - Pictures
  - Illustrations
- Explain plant configuration/unique features.
- State all assumptions clearly.
- List of specific references in preparation of request.
  i.e., FSAR Section, Industry Standard & Date, SRP Section
- State differences from standard review plan.
- For precedent show comparison - identify differences.
- Be specific in what regulatory commitments are being made.

Qualities of a Good License Submittal

- Implementation timeframe.
- Providing the date when precedents were approved.
- Need for proprietary affidavit and redacted version. Also, a disclaimer on where the proprietary information is located (in cover letter)..
- 50.12 justification for the exemption
- Statement regarding environmental consideration.
- Reference ITS when applicable.
- Clear indication of the basis for a risk-informed issue.
- Supplemental submittals should document their impact on the NSHD.

Quality of a Good SE

- Accurately capture licensee commitments.
- Accurately capture scope and basis of approval.
- Addressing public comments.

Submittal

- Identify the audience.
- Justify conclusions, e.g., This is safe because . . .
- Detail level of references.
  - Commensurate with purpose.
  - Importance of the item.
  - Ability to stand alone. (Is it clear?)
- Applicability of expected standards, (i.e., SRP).
- Precedents
- Supplements must be clear.
  - send references
  - involve the PM
- Identify commitments.
- EIE

SER

- No surprises.
- Case of staff's analysis.
- Assumptions must be clearly stated, and consistent with Licensee's submittal.

QUALITIES OF A "GOOD" LICENSE SUBMITTAL FROM NRC/ENTERGY

LICENSING WORKSHOP

The NRC and Entergy Operations Inc., jointly sponsored a licensing workshop at Entergy's Waterford plant on December 2 and 3, 1998. The culmination of the workshop was the production of an outline of the qualities of a "good" submittal. The outline is reproduced below for your use. One goal of the Mid-Atlantic workshop is to refine this outline based on insights from attendees.

The **COVER LETTER** should include the following attributes and features:

- A descriptive title.
- A clear summation of what you want, why you want it and when you want it.
- References to prior correspondence, meeting, telephone calls, etc.
- A clear statement of proprietary information.
- A brief description of the safety/technical basis for the action.
- A clear description of the regulatory processes for change (50.59, 50.55a, etc.).
- Discuss the risk-informed nature of the submittal, if applicable.
- "If multiple processes, provide clear road map."
- Indicate and cite applicable regulation if the amendment is being filed as exigent or emergency.

The **ATTACHMENTS** format should generally follow this outline:

- Have logically ordered headings and subheadings.
- Have an organized thought process to tell "the whole story."
- Break out sections into distinct pieces, such as historical, technical, etc.
- Define and explain technical terms.
- The no significant hazards consideration sections should redefine technical terms (acronyms).
- Anticipate questions and address them in the letter.
- Write background and basis for change sections for use in the NRC staff's safety evaluation report.
- Consider submitting drawings for clarification.
- Supplements to original submittals need to stand alone.

DESCRIPTION OF CHANGE:

- Identify affected technical specifications sections and describe changes.
- Make sure change reflects what you think it does.

QUALITIES OF A "GOOD" LICENSE SUBMITTAL FROM NRC/ENTERGY

LICENSING WORKSHOP

BACKGROUND should include:

- System descriptions (regulatory/design basis).
- Industry references, including other licensee approvals.
- Previous discussion, correspondence.
- Current requirements.
- The conditions to be resolved.
- The applicable final safety analysis report sections for reference.
- The history of the topic.

BASIS FOR CHANGE include:

- Avoid false sense of security based upon industry precedent.
- Describe analytical methods, data and results.
- Describe how you conform to applicable standards such as regulatory guides, standard review plans, Nuclear Energy Institute documents, etc.
- Not make broad commitments. Be specific or don't commit.
- Be complete in the justification for change.
- Discuss the impact of the change on accident analysis/risk.

JUSTIFICATION FOR EXIGENT/EMERGENCY CONSIDERATION:

- If applicable, include reasons for requesting emergency or exigent circumstances.

NO SIGNIFICANT HAZARDS CONSIDERATION:

- Be a stand-alone section available for use in the Federal Register notice.
- Reflect previous discussion.
- Provide a brief summary of the change.
- Answer each question fully.
- Be clear, understandable, concise, yet sufficiently detailed. The audience is the public.
- Be specific to the plant, especially if a generic change is used as a justification.

ENVIRONMENTAL STATEMENTS:

- Include if necessary.

QUALITIES OF A "GOOD" LICENSE SUBMITTAL FROM NRC/ENTERGY

LICENSING WORKSHOP

TECHNICAL SPECIFICATIONS PAGES, Include both:

- Marked-up pages.
- Revised pages.

COMMITMENTS:

- If any.

Docket No. _____

_____

Re: 10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Changes to Technical Specifications
Updating List of Documents Describing the Analytical Methods Specified in
Technical Specification 6.9.1.8b

Pursuant to 10 CFR 50.90, hereby proposes to amend Operating License by incorporating the attached proposed changes into the Technical Specifications. The proposed changes will update the list of documents, describing the analytical methods used to determine the core operating limits, specified in Technical Specification 6.9.1.8b. The reason for these changes is to incorporate the most recent, Nuclear Regulatory Commission (NRC) approved, methodology documents in Technical Specifications. These changes will update the documents describing the analytical methods used in the current Large Break Loss of Coolant Accident analysis (LBLOCA) and the neutronics core design of cycle and beyond.

Attachment 1 provides a discussion of the proposed changes and the Safety Summary. Attachment 2 provides the Significant Hazards Consideration. Attachment 3 provides the marked-up version of the appropriate pages of the current Technical Specifications. Attachment 4 provides the retyped pages of the Technical Specifications.

Environmental Considerations

has reviewed the proposed License Amendment Request against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes will update the list of documents, describing the analytical methods used to determine the core operating limits, specified in Technical Specification 6.9.1.8b. These changes will not significantly increase the type and amounts of effluents that may be released offsite. In addition, this amendment request will not significantly increase individual or cumulative occupational radiation exposures. Therefore, has determined the proposed changes will not have a significant effect on the quality of the human environment.

Conclusions

The proposed changes do not involve a significant impact on public health and safety (see the Safety Summary provided in Attachment 1) and do not involve a Significant Hazards Consideration pursuant to the provisions of 10 CFR 50.92 (see the Significant Hazards Consideration provided in Attachment 2).

Plant Operations Review Committee and Nuclear Safety Assessment Board

The Plant Operations Review Committee and Nuclear Safety Assessment Board have reviewed and concurred with the determinations.

Schedule

We request issuance of this amendment prior to restart from refueling outage , which is currently scheduled in early , with the amendment to be implemented within 30 days of issuance.

State Notification

In accordance with 10 CFR 50.91(b), a copy of this License Amendment Request is being provided to the State of

There are no regulatory commitments contained in this letter.

If you should have any questions regarding this submittal, please contact Mr.

Very truly yours,

Vice President -

Subscribed and sworn to before me

this_____ day of _____.

_____
Notary Public

Date Commission Expires:_____

cc: See next page

Docket No._____

Attachment 1

Change to Technical Specifications
Updating List of Documents Describing the Analytical Methods Specified in Technical Specification 6.9.1.8b
Discussion of Changes

Change to Technical Specifications
Updating List of Documents Describing the Analytical Methods Specified in Technical Specification 6.9.1.8b
Discussion of Changes

Introduction

hereby proposes to amend Operating License by incorporating the attached proposed changes into the Technical Specifications. The proposed changes will update the list of documents, describing the analytical methods used to determine the core operating limits, specified in Technical Specification 6.9.1.8b.

Description of Proposed Change

The proposed changes will update the documents describing the Siemens methodology given in Technical Specification 6.9.1.8b. The following documents will be replaced:

1. The document contained in section 6.9.1.8b.1 will be replaced with the document listed in Insert A. This change is required to include the most recent methodology description and benchmarking results of the reactor analysis system used in the neutronics core analysis of cycle and beyond.

2. The documents contained in section 6.9.1.8b.8 will be replaced with one document listed in Insert B. This change is required to include the most recent Emergency Core Cooling System (ECCS) model used in Large Break Loss of Coolant Accident (LBLOCA) applications. This model contains resolution of the deficiencies reported under 10 CFR 50.46(a) in a letter dated .[1]

3. The document contained in section 6.9.1.8b.4 will be revised by replacing "93" with "093" and adding "(A)" to indicate that it was approved by the Nuclear Regulatory Commission (NRC).

These changes will update the documents describing the analytical methods used in the current LBLOCA analysis and the neutronics core design of cycle and beyond. The documents listed in Inserts A and B have already been approved by the NRC.

Safety Summary

The proposed changes will update the documents describing the Siemens methodology given in Technical Specification 6.9.1.8b. The following documents will be replaced:

---

(1) letter to the Nuclear Regulatory Commission, " , Reporting of Changes to, and Errors in, Emergency Core Cooling System Models or Applications," dated .

1. The document contained in section 6.9.1.8b.1 will be replaced with the document listed in Insert A. This change is required to include the most recent methodology description and benchmarking results of the reactor analysis system used in the neutronics core analysis of cycle and beyond.

2. The documents contained in section 6.9.1.8b.8 will be replaced with one document listed in Insert B. This change is required to include the most recent ECCS model used in LBLOCA applications. This model contains resolution of the deficiencies reported under 10 CFR 50.46(a) in a letter dated .[1]

3. The document contained in section 6.9.1.8b.4 will be revised by replacing "93" with "093" and adding "(A)" to indicate that it was approved by the NRC.

These changes will update the documents describing the analytical methods used in the current LBLOCA analysis and the neutronics core design of cycle and beyond. The documents listed in Inserts A and B have already been approved by the NRC.

The use of the revised methodology still provides a conservative simulation of the LBLOCA and conservative core neutronics analysis. The use of the revised methodology also constitutes an improvement over the previous methodology. Therefore, the proposed changes will have no adverse effect on plant safety.

Docket No. _____

Attachment 2

Change to Technical Specifications
Updating List of Documents Describing the Analytical Methods Specified in Technical Specification 6.9.1.8b
Significant Hazards Consideration

Proposed Revision to Technical Specifications
Updating List of Documents Describing the Analytical Methods Specified in Technical Specification 6.9.1.8b
Significant Hazards Consideration

Significant Hazards Consideration

In accordance with 10 CFR 50.92, has reviewed the proposed changes and has concluded that they do not involve a Significant Hazards Consideration (SHC). The basis for this conclusion is that the three criteria of 10 CFR 50.92(c) are not compromised. The proposed changes do not involve an SHC because the changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed change in document 1 of Technical Specification 6.9.1.8b is made to provide the most recent, Nuclear Regulatory Commission (NRC) approved, methodology description and benchmarking results of the reactor analysis system used in the core neutronics analysis of cycle and beyond. This change has no impact on plant equipment operation. Since the change only affects the neutronics analysis of the core, it cannot affect the likelihood or consequences of accidents. Therefore, this change will not significantly increase the probability or consequences of an accident previously evaluated.

   The proposed change in document 8 of Technical Specification 6.9.1.8b is made to include the most recent, NRC approved, Emergency Core Cooling System (ECCS) model used in Large Break Loss of Coolant Accident (LBLOCA) applications. This model contains resolution of the deficiencies reported under 10 CFR 50.46(a) in a letter dated .[1] The use of the revised methodology also constitutes an improvement over the previous methodology. Therefore, this change will not significantly increase the probability or consequences of an accident previously evaluated.

   The proposed changes in document 1 of Technical Specification 6.9.1.8b are administrative in nature. Therefore, these changes will not significantly increase the probability or consequences of an accident previously evaluated.

---

(1) letter to the Nuclear Regulatory Commission, " , Reporting of Changes to, and Errors in, Emergency Core Cooling System Models or Applications," dated .

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change in document 1 of Technical Specification 6.9.1.8b is made to provide the most recent, NRC approved, methodology description and benchmarking results of the reactor analysis system used in the neutronics analysis of cycle and beyond. The proposed change in document 1 of Technical Specification 6.9.1.8b will not alter the plant configuration (no new or different type of equipment will be installed) or require any new or unusual operator actions. It does not alter the way any structure, system, or component functions and does not alter the manner in which the plant is operated.

The proposed change in the documents in number 8 of Technical Specification 6.9.1.8b is made to include the most recent, NRC approved, ECCS model used in LBLOCA applications. The proposed change in document 8 of Technical Specification 6.9.1.8b will not alter the plant configuration (no new or different type of equipment will be installed) or require any new or unusual operator actions. It does not alter the way any structure, system, or component functions and does not alter the manner in which the plant is operated.

The proposed changes in document 4 of Technical Specification 6.9.1.8b are administrative in nature. These changes do not alter the way any structure, system, or component functions and do not alter the manner in which the plant is operated.

These changes do not introduce any new failure modes. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in a margin of safety.

The proposed change in document 1 of Technical Specification 6.9.1.8b is made to provide the most recent, NRC approved, methodology description and benchmarking results of the reactor analysis system used in the neutronics analysis of cycle and beyond. It has no impact on plant equipment operation. The proposed change in document 8 of Technical Specification 6.9.1.8b is made to include the most recent, NRC approved, ECCS model used in LBLOCA applications. This model contains resolution of the deficiencies reported under 10 CFR 50.46(a) in a letter dated .[1] The use of the revised methodology still provides a conservative simulation of the LBLOCA and conservative core neutronics analysis. The use of the revised methodology also constitutes an improvement over the previous methodology. The new documents will clearly identify the approved Siemens Topical Reports applicable to and will ensure that methodology changes will be

identified and submitted to the NRC for approval, as required. The proposed changes in document 4 of Technical Specification 6.9.1.8b are administrative in nature. Therefore, the proposed changes will not result in a significant reduction in a margin of safety.

As described above, this License Amendment Request does not involve a significant increase in the probability of an accident previously evaluated, does not involve a significant increase in the consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident from any accident previously evaluated, and does not result in a significant reduction in a margin of safety. Therefore, has concluded that the proposed changes do not involve an SHC.

Docket No. _____

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Attachment 3

Change to Technical Specifications
Updating List of Documents Describing the Analytical Methods Specified in Technical Specification 6.9.1.8b
Marked Up Pages

Docket No. _____

_____

Attachment 4

Change to Technical Specifications
Updating List of Documents Describing the Analytical Methods Specified in
Technical Specification 6.9.1.8b
Retyped Pages

ATTRIBUTES OF NRC SAFETY EVALUATION

INTRODUCTION

- Reference to licensee request.
- Reference to supplemental submittals and their impact on the no significant hazards consideration determination.
- Brief description of proposed change.
- Reference to related NRC activities (e.g., generic letters).

BACKGROUND

- Applicable regulations cited.
- Specific applicable regulatory criteria described.
- Description of system/component and current requirements included.
- Purpose of amendment requests described.
- Precedent licensing actions described. Differences between the submittal in question and the precedent noted and addressed.

EVALUATION

- Detailed description of the proposed change included.
- Method of staff review described.
- Key information used in the review (from licensee or general knowledge) included.
- Comparison of change to regulatory criteria included.
- Regulatory commitment(s) & related finding(s).
- Findings/conclusions included.

ATTRIBUTES OF NRC SAFETY EVALUATION

OTHER CONSIDERATIONS, AS NEEDED

- Discussion of exigent/emergency circumstances and staff's findings.
- Final no significant hazards consideration determination

STATE CONSULTATION

- State consultation conducted and comments addressed.

ENVIRONMENTAL CONSIDERATIONS

- Required categorical exclusion or reference to a published environmental assessment included.

CONCLUSION

- Staff conclusion that the action does not endanger public health and safety.

REFERENCES

- All applicable utility correspondence, UFSAR sections, regulatory requirements/guidance, and industry standards/guides included (in reference section or within SE text).

Submitting Relief Requests to the NRC

Alexander Dromerick, NRC Project Manager

10 CFR 50.55a Subjects

Subjects	10 CFR 50.55a Paragraph
Reactor Coolant Pressure Boundary	50.55a(c)
Quality Group B Components	50.55a(d)
Quality Group C Components	50.55a(e)
Inservice Testing Items	50.55a(f)
Inservice Inspection (examination) Items	50.55a(g)
Protection Systems	50.55a(h)

Methods to Use to Ask for Relief

I. Propose an alternative to the code requirement and show that:

- the alternative provides an acceptable level of quality and safety pursuant to **10 CFR 50.55a(a)(3)(i)**, or

- complying with the code requirement would result in hardship or unusual difficulty without a compensating increase in quality or safety pursuant to **10 CFR 50.55a(a)(3)(ii).**

II. Show that the code requirement is impractical (not just inconvenient) pursuant to **10 CFR 50.55a(f)(6)(i)** for inservice testing items or **50.55a(g)(6)(i)** for inservice inspection (examination) items.

Methods the NRC Can Use to Authorize an Alternative or Grant Relief

- Authorize a licensee-proposed alternative in accordance with **10 CFR 50.55a(a)(3)(i)** if NRC determines that the alternative provides an acceptable level of quality and safety, or

- Authorize a licensee-proposed alternative (if any) in accordance with **10 CFR 50.55a(a)(3)(ii)** if NRC determines that complying with the specified requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety, or

- Grant relief and impose alternative requirements in accordance with **10 CFR 50.55a(f)(6)(i)** for inservice testing items if NRC determines that the code requirement is impractical, or

- Grant relief and impose alternative requirements in accordance with **10 CFR 50.55a(g)(6)(i)** for inservice inspection (examination) items if NRC determines that the code requirement is impractical.

Table 1 — Relief Request Guidance

10 CFR 50.55a Section	Applicable Table
10 CFR 50.55a**(a)(3)(i)**	**see Table 2**
10 CFR 50.55a**(a)(3)(ii)**	**see Table 3**
10 CFR 50.55a**(f)(6)(i)**	**see Table 4**
10 CFR 50.55a**(g)(6)(i)**	**see Table 5**
10 CFR 50.55a**(g)(6)(ii)(A)(5)**	**see Table 5**

☞ Note: Pick the single, most applicable 10 CFR 50.55a section to address.

☞ Note: The NRC can only authorize an alternative that the utility proposes in their written submittal. The utility must prepare another written submittal proposing (other) alternatives if they decide or agree with the NRC to use (other) alternatives.

Table 2 — Authorizing a Proposed Alternative in Accordance with 10 CFR 50.55a(a)(3)(i)

Purpose	Authorize a utility-proposed alternative in accordance with **10 CFR 50.55a(a)(3)(i)**.
Necessary Determination	Determine if the utility-proposed alternative provides an acceptable level of quality and safety.
Guidance	➽ Indicate the applicable Code edition and addenda, and describe the Code requirement.
	➽ Describe the proposed alternative and bases.
	➽ Discuss why the proposed alternative provides an acceptable level of quality and safety.
	➽ Specify the duration of the proposed alternative.
	➽ Do not mention impracticality, burden, unusual difficulty or hardship.

Table 3 Authorizing a Proposed Alternative in Accordance with 10 CFR 50.55a(a)(3)(ii)

Purpose	Authorize a utility's proposed alternative in accordance with **10 CFR 50.55a(a)(3)(ii)**.
Necessary Determinations	Determine if complying with the specified requirement would result in hardship or unusual difficulty (rather than being impractical) without a compensating increase in the level of quality and safety.
	For ISI items — Determine if the proposed alternative provides reasonable assurance of pressure boundary integrity.
	For IST items — Determine if the proposed alternative provides reasonable assurance that the component or system is operationally ready (capable of performing its intended function).
Guidance	➽ Indicate the applicable Code edition and addenda, and describe the Code requirement.
	➽ Describe the utility-proposed alternative and bases.
	➽ Discuss why complying with the specified requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.
	➽ For IST items: Discuss why the proposed alternative provides reasonable assurance that the component or system is operationally ready.
	➽ For ISI items: Discuss why the proposed alternative provides reasonable assurance of pressure boundary integrity.
	➽ Specify the duration of the proposed alternative.
	➽ Do not mention impracticality.

Table 4 Inservice Testing — Granting Relief in Accordance with 10 CFR 50.55a(f)(6)(i)

Purpose	Grant relief and impose alternative requirements in accordance with **10 CFR 50.55a(f)(6)(i)** for inservice testing items.
Necessary Determinations	Determine if the code requirement is impractical.
	Determine if the proposed testing provides reasonable assurance that the component is operationally ready (capable of performing its intended function).
Guidance	➽ Indicate the applicable Code edition and addenda.
	➽ Describe the utility's proposed alternative (if any) and bases.
	➽ Describe why it is impractical for the utility to comply with the specified requirement.
	➽ Describe the burden on the utility created by imposing the requirement (e.g., having to replace a component, redesign the system or shutdown the plant).
	➽ Discuss why the proposed testing provides reasonable assurance that the component is operationally ready.
	☞ Note: **10 CFR 50.55a(f)(6)(i)** allows the NRC to impose additional requirements without having the utility first commit to them. **10 CFR 50.55a(a)(3)** does not allow this.
	➽ Specify the duration of the alternative.
	➽ Do not mention hardship or unusual difficulty.

Table 5 Inservice Inspection — Granting Relief in Accordance with 10 CFR 50.55a(g)(6)(i)

Purpose	Grant relief and impose alternative requirements in accordance with **10 CFR 50.55a(g)(6)(i)** for inservice inspection (examination).
Necessary Determinations	Determine if the code requirement is impractical.
	Determine if the proposed inservice inspection (examination) provides reasonable assurance of component or structure pressure boundary integrity.
Guidance	➽ Additional guidance in Generic Letter 90-05
	➽ Indicate the applicable Code edition and addenda, and describe the Code requirement.
	➽ Describe the proposed alternative (if any) and bases.
	➽ Describe why it is impractical to comply with the specified requirement.
	➽ Describe the burden created by imposing the requirement (e.g., having to replace a component, redesign the system or shutdown the plant).
	➽ Describe why the proposed inspection (examination) provides reasonable assurance of component or structure pressure boundary integrity.
	☞ Note: **10 CFR 50.55a(f)(6)(i)** allows the NRC to impose additional requirements without having the utility first commit to them.
	➽ Specify the duration of the alternative.
	➽ Do not mention hardship or unusual difficulty.

☞ Note: For augmented reactor vessel shell weld examination reliefs we authorize a proposed alternative IAW **10 CFR 50.55a(g)(6)(ii)(A)(5)** if we determine that the alternative provides an acceptable level of quality (rather than the code requirement being impractical).

NRC Considerations for Electronic Communication Tools

Mid-Atlantic Utilities/NRC Licensing Workshop
Valley Forge Hilton
May 2 - 3, 2000

Rick Ennis, U.S. NRC

Purpose of Presentation

- To discuss the types of electronic communication tools being used for NRC/Licensee interactions.

- To discuss considerations which must be taken into account in determining which electronic communication tool should be used in a give situation.

- To discuss appropriate versus inappropriate use of these communication tools.

NRC/Licensee Electronic Communication Methods

- Phone
- Fax
- Email
- Electronic Information Exchange (EIE)

Considerations

- Letters provide the primary formal means of communicating with the licensee.

- NRC policy requires that licensee communication that the NRC responds to or that enter into NRC evaluations must be submitted in writing.

- NRC policy dictates that the NRC does not accept draft documents or correspondence from a licensee for review and/or comment.

Considerations (continued)

- 10 CFR Part 2 and 9 require that correspondence between the licensee and the staff be made available to the public.

- All NRC records, including electronic records (e.g., emails, electronic files, diskettes) and hard copies printouts of electronic records are subject to Freedom of Information Act (FOIA) requests.

- All Federal agencies are required to comply with the regulations governing Federal records management issued by the National Archives and Records Administration (NARA0 and General Services Administration (GSA)

Phone

Appropriate use:

- Phone calls may be used to exchange routine information with licensee (e.g., plant status, status of licensing actions).

- Phone calls may be used to obtain or request clarifying information from the licensee for a licensing action.

Phone

Inappropriate use:

- Phone calls should not be used to obtain information from a licensee to use as a basis for a licensing actions.

Fax/Email

Appropriate use:

- Faxes and Email may be used to send or receive advance copies of dated official documents (e.g., Applications, Amendments) that will be made publically available in ADAMS.

- Faxes and Email may be used to obtain or request clarifying information from the licensee for a licensing action. The PM should ensure that a copy of the information that is sent or received is added to ADAMS as a publically available record.

Fax/Email

Inappropriate use:

- Faxes and email should not be used to obtain information from a licensee to use as a basis for a licensing action.

Electronic Information Exchange (EIE)

- Electronic Information Exchange (EIE) is the process of electronically submitting and receiving documents in electronic form.

- 10 CFR 50.4 delineates the procedures that applicants and licensees must follow when submitting documents to the NRC required by Part 50.

Electronic Information Exchange (EIE) (continued)

- Section 50.4(c) currently requires all submissions to the NRC to be made in paper format unless an exception is granted. Those persons seeking an exception must obtain prior approval from the NRC on a case-by-case basis.

- In order for the NRC to further comply with several legislative and regulatory mandates, such as the Paperwork Reduction Act, the NRC intends to implement a rulemaking plan to facilitate the voluntary electronic submission of documents by applicants, licensees, and members of the public.

Electronic Information Exchange (EIE) (continued)

- The proposed rulemaking would allow electronic submissions without requiring prior NRC approval. The rulemaking is expected to be implemented by the end of 2000.

- Three sites (Fermi, Grand Gulf, Calvert Cliffs) have volunteered to participate in a pilot EIE program that started in March 2000.

- The EIE process is accomplished by the exchange of electronic documents in a secure manner via the Internet.

Electronic Information Exchange (EIE) (continued)

- Documents submitted via EIE that require signature will be signed using a digital signature certificate.

- EIE participants must have access to the World Wide Web through an Internet Service Provider and must use either Netscape and Internet Explorer browser software.

- EIE documents can be submitted in PDF, TIF, MS Word, WordPerfect, and ASCII formats. It is expected that the system will be expanded to allow other formats in the future.

Electronic Information Exchange (EIE) (continued)

- Current file size limit is 5 megabytes. For large files (e.g., UFSAR), CD ROM would be the media to use.

- Documents submitted via EIE will be added to ADAMS.

- For further information on EIE, contact John Skoczlas, OCIO, at (301) 415-7186 or jas1@nrc.gov.

References

1) PM Handbook, Section 2.4.1, "Interactions with the Licensee"
2) PM Handbook, Section 3.5.4, "Electronic Information Exchange (E-mail)"
3) NRR Office Letter 107, "Review on Unsolicited or Draft Information"
4) NRC Management Directive 3.1, "Freedom of Information Act"
5) NRC Management Directive 3.4, "Release of Information to the Public"
6) NRC Management Directive 3.53, "NRC Records Managment Program"
7) NRC Management Directive 3.57, "Correspondence Management"
8) 10 CFR 2, "Rules of Practice for Domestic Licensing Proceedings and Issuances of Orders"
9) 10 CFR 9, "Public Records"
10) 10 CFR 50.4, "Written Communications'
11) SECY-99-205, "Rulemaking Plan: Revision of 10 CFR to Permit the Submision of Documents Electronically; Minor Corrections"

Attributes of Effective Working Relationships between Licensees and NRC PMs

Breakout Session

Helen Pastis - NRC

George Rombold - PECO

Goal of Breakout Session

To provide a listing of the common attributes which are necessary to develop and maintain an effective working relationship between the Licensee and the NRC PM.

Breakout Process

- Use brainstorming techniques to develop a listing of attributes from each stakeholders perspective
- From brainstorming exercise - Develop a list of areas of strong agreement and areas of strong disagreement (if any).
- Focused mostly on the routine verbal communications (vice the docketed submittals)
- Utilizing a modified "Stakeholder Window" Format

Stakeholder Window Process

(Defines present State)

	Gets	***Doesn't Get***
Wants	What are you getting that you want?	What aren't you getting that you want?
Doesn't Want	What are you getting that you don't want?	What aren't you getting that you don't want?

Modified Stakeholder Window Process

Common Set of Expectations Going Forward

Who (Licen./NRC)	***What you Want***	***What you Don't Want***
(e.g. NRC)	*Advance notice of License amendments with expected turn around times*	*Licensee Direct contact of review staff without involvement of NRC PM*
(e.g. Licensee)	*Early Notification when scheduled dates are in jeopardy*	*Licensee Direct contact of review staff without involvement of NRC PM*

Breakout Ground Rules

- Be as specific as possible in what you are asking for
- In brainstorming there are no bad ideas
- Stay engaged and Participate

Breakout Deliverables

- Completed brainstorming flip charts
- Indicate 5-10 Top Areas of Strong Alignment
- Indicate 5-10 (if any) Top Areas of Strong Difference

AREAS OF STRONG AGREEMENT

- Good turnover and transition to new PM.
- Good rapport ("trust").
- Stronger effort to present other side's position to own staff.
- Clear licensee priorities and schedules (keep current).
- Regular status communication.
- Heads up on Senior Managment contacts on issues.
- Long-term relationship (2 - 5 years).
- Right people at meeting/telecon.
- Better administrative support at NRR.

AREAS OF STRONG DISAGREEMENT

- Opportunity for involvement in Region requests for NRR (TIA's)
- Don't tell me something "off the record."
- Custom Technical Specification.
- No adequate parking at White Flint or the plant.

AREAS OF INCONSISTENCIES AMONG THE GROUPS

- Single point of contact vs. multiple point of contact at NRC.

FEEDBACK

LICENSING WORKSHOP
Valley Forge Hilton
Valley Forge, Pennsylvania
May 2-3, 2000

On a scale of 1 to 10, please provide an *overall* rating for workshop/ materials and effectiveness_____.

Excellent	**Very Good**	**Good**	**Fair**	**Unsatisfactory**
10--------9-	--8-------7-	--6-------5--	--4-------3-	----2------1--

A. PLEASE RATE THE WORKSHOP/MATERIALS, USING A SCALE OF 1 TO 10, AS TO:

1. **Accomplishment of objectives** _____
2. **Coverage of subject matter** _____
3. **Organization of subject matter** _____
4. **Suitability of instructional materials** _____

***Overall* rating for the workshop/materials** _____

B. PLEASE RATE THE PRESENTERS/FACILITATORS ON THE FOLLOWING ITEMS, USING A SCALE OF 1 TO 10.

1. **Effectiveness of presentations** _____
2. **Presenter/Facilitator's ability to answer questions** _____
3. **Presenter/Facilitator's effectiveness in keeping discussions focused on relevant topics** _____
4. **Presenter/Facilitator's courtesy and tact** _____

***Overall* rating of the presenters/facilitators** _____ _____

C. YOUR KNOWLEDGE AND SKILL LEVEL OF THE SUBJECT MATTER

1. Before taking the workshop

NONE HIGH

_____1_____2_____3_____4_____5_____6_____7_____8_____9_____10

2. After taking the workshop

NONE HIGH

_____1_____2_____3_____4_____5_____6_____7_____8_____9_____10

3. How well will you be able to use what you learned?

A great deal____ Mostly____Somewhat____Minimally_____Not at all____

D. OTHER

1. WHAT DID YOU PARTICULARLY LIKE ABOUT THE WORKSHOP?

_____

_____

_____

_____

2. WHAT WERE THE WORKSHOP'S STRENGTHS?

_____

_____

_____

_____

3. WHAT WERE THE WORKSHOP'S WEAKNESSES?

_____

_____

_____

4. DO ANY PARTS OF THE WORKSHOP NEED IMPROVEMENT?

_____

_____

_____

_____

_____

5. HOW WILL YOU USE WHAT YOU'VE LEARNED AT THE WORKSHOP?

_____

_____

_____

_____

_____

_____

_____

6. AT WHAT FREQUENCY DO YOU THINK THESE WORKSHOPS SHOULD BE HELD?

_____