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

June 29, 2000

LICENSEES: CAROLINA POWER & LIGHT COMPANY
FLORIDA POWER CORPORATION

FACILITIES: BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
CRYSTAL RIVER, UNIT 3
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2
SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1

SUBJECT: MEETING SUMMARY OF NRC/CP&L/FPC LICENSING WORKSHOP

The Nuclear Regulatory Commission (NRC) and Carolina Power & Light Company (CP&L) jointly sponsored a licensing workshop on May 31 and June 1, 2000, in Cary, North Carolina. Two representatives from Florida Power Corporation (FPC) also attended the workshop. The goals of the workshop included improving the quality of licensing submittals, raising the level of knowledge and understanding of the regulatory process, and enhancing the interface between licensees and the NRC. Major topics of discussion included the licensing process from both the NRC and the licensee perspective, the attributes of a good relief request, information on NRC document control and processing (ADAMS) and electronic information exchange, an overview of the revised quality assurance rule, a discussion of notices of enforcement discretion, attributes of a high quality license amendment request, agency activities regarding risk informed licensing actions and rulemaking, the role of the NRC project manager, and fee billing for project manager labor.

Enclosure 1 is a list of workshop attendees, Enclosure 2 is an analysis of the feedback received from workshop attendees, Enclosure 3 is a list of the attributes of a high quality license amendment request as developed by the attendees during breakout sessions at the workshop, Enclosure 4 includes answers to questions posed during the workshop, and Enclosure 5 contains copies of the workshop handouts. Questions or comments concerning the workshop may be directed to Allen Hansen, Project Manager, at (301) 415-1390 or AGH@NRC.GOV.

Allen G. Hansen, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-325, 50-324, 50-302, 50-261, 50-400

Enclosures:
1. List of Attendees
2. Feedback Analysis
3. Attributes of a High Quality License Amendment Request
4. Answers to Workshop Questions
5. Workshop Handouts

cc w/encls: See next page

LIST OF ATTENDEES

NAME	AFFILIATION
Lenny Beller	CP&L - Brunswick
John McIntyre	CP&L - Brunswick
Mark Turkal	CP&L - Brunswick
Bill Murray	CP&L - Brunswick
Warren Dorman	CP&L - Brunswick
Ken Nicely	CP&L - Brunswick
Steve Tabor	CP&L - Brunswick
Larry Wheatley	CP&L - Brunswick
Peter Jordan	CP&L - Brunswick
Eric Harkcom	CP&L - Brunswick
Glen Thearling	CP&L - Brunswick
Eric McCartney	CP&L - Harris
Mark Ellington	CP&L - Harris
Rick Gardner	CP&L - Harris
Michael Wallace	CP&L - Harris
Tillie Wilkins	CP&L - Harris
Teresa Koeppen	CP&L - Harris
Peter Yandow	CP&L - Robinson
Brad Dolan	CP&L - Robinson
CT Baucom	CP&L - Robinson
Harold Chernoff	CP&L - Robinson
Bill Ziegler	CP&L - Headquarters
John Caves	CP&L - Headquarters
David Lee	CP&L - Headquarters
Cristina Ionescu	CP&L - Headquarters
Robert Hill	CP&L - Headquarters

Enclosure 1

NAME	AFFILIATION
Phil Opsal	CP&L - Headquarters
Dan Strong	CP&L - Headquarters
Bill Slover	CP&L - Headquarters
Frieda Frando	FPC - Crystal River
Sid Powell	FPC - Crystal River
Johnny James	State of North Carolina
Mel Fry	State of North Carolina
Herbert Berkow	NRC
Richard Correia	NRC
Ram Subbaratnam	NRC
Richard Laufer	NRC
Allen Hansen	NRC

FEEDBACK ANALYSIS

(1) WORKSHOP

Overall, most participants rated the workshop as very good to excellent. The rating was the same regarding accomplishment of objectives. The rating for the coverage and organization of the subject matter, and the suitability of the materials was very good.

(2) JOB-RELATED KNOWLEDGE AND SKILL

Most participants rated their job-related knowledge and skill good to very good before the workshop, and very good to excellent after the workshop.

(3) STRENGTHS OF THE WORKSHOP

Several participants stated that the strengths of the workshop included open discussions and good exchanges, NRC management and PM presence, discussions of Task Interface Agreements (TIAs) and Notices of Enforcement Discretion (NOEDs), and brainstorming what constitutes a good submittal.

(4) WEAKNESSES OF THE WORKSHOP

Some participants felt the ADAMS presentation contained too much historical information, the CP&L submittals selected for review did not have enough "problems," and the review performed on the submittals did not provide significant benefit.

(5) PROPOSED IMPROVEMENTS TO THE WORKSHOP

Participants stated that an ADAMS demonstration would be helpful, and that discussions of ADAMS organization, categorization, search and retrieval capabilities would be useful. A consolidation of all workshop "attributes of a good submittal" and details of current NRC initiatives would be useful. In addition, NRC concerns with licensee packages should be articulated, and the discussion on TIAs should be expanded. Finally, NRC regional personnel participation and the use of better audiovisual equipment were encouraged.

(6) WORKSHOP ELEMENTS USEFUL FOR JOB PERFORMANCE

Most participants stated that the "attributes of a good submittal" provided information that will lead to better licensee submittals.

(7) WORKSHOP TIMING AND DURATION

Most attendees favor a "day and a half" workshop with NRC about every 2 years.

(8) OTHER COMMENTS

Attendees (NRC and licensee) gained a better understanding of each other's processes and challenges, which will help them be more effective in the future. NRC management at the meeting set an impressive standard of involvement during the meeting, which helped to draw others into the dialogs.

CONTENTS OF A QUALITY LICENSE AMENDMENT REQUEST
CP&L/NRC LICENSING COUNTERPARTS MEETING
MAY 31 - JUNE 1, 2000

Everywhere

Include exact wording you'd like to see in the *Federal Register* (FR) notice and Safety Evaluation (SE). Keep the intended audience in mind.

Define acronyms in each document

Use wording in regulations - don't paraphrase

Only provide required detail. Don't use more numbers than necessary.

Proofread for spelling, grammar, and technical accuracy.

Ensure proprietary or safeguards information is identified clearly on every applicable page

Cover Letter

Normal header (docket, date, address, salutation, etc.)

Descriptive title

Purpose of submittal

Basic description

Risk significance

Precedents

Summary of application content

- List of enclosures
- TAC number (if supplement or RAI response)
- Proprietary content
- Safeguards

References

- Regulation citation (10 CFR 50.92)
- Linked submittals
- Prior communication (meetings, NOED, phone calls, etc.)

Enclosure 3

Cover Letter (continued)

Schedule

When you need it and why
Implementation schedule
Classification (emergency, exigent, outage, etc)

Licensing contact information

Copy forwarded to state and other authorities

Distribution list

Oath and affirmation

Enclosure 1, Description of proposed change

Brief description of change (from cover letter)

Background

Proposed change

Approval requested

Expected product

Please issue
When
Why
Implementation

Detailed description of change

Safety evaluation

Justification of change
Technical content
Licensing basis
Compensatory measures
Risk insights
Methods used (approval or topical reference)
Compare to Branch Technical Position or Standard Review Plan
Wording for SE

Enclosure 1, Description of proposed change (continued)

References

TSTF
Correspondence
Precedent

Supporting graphics (8 ½ x 11)

FSAR reference

Conclusion

Enclosure 2, 50.92 Evaluation

Brief description of change (from cover letter)

Follow standard structure

Provide text for FR notice

Enclosure 3, Environmental consideration

Brief description of change (from cover letter)

Basis for determination (short)

Reference categorical exclusion bases

Conclusion

Enclosure 4, page change instructions

Add/delete table

Enclosure 5, revised pages

Markups

Final typed pages

ANSWERS TO WORKSHOP QUESTIONS

1. Questions were raised regarding the need for licensing documents to be submitted to NRC under oath and affirmation. This issue is under review within NRC and the industry will be notified if there are any changes to current policy.

2. Questions were asked related to standards for probabilistic risk assessment (PRA) models used by licensees as part of the preparation of risk-informed licensing submittals. Currently, the staff is evaluating each application individually. Factors being reviewed include the date of the PRA model and the model's suitability for the particular application.

3. Questions were posed about risk-informed technical specifications (TS). There is an ongoing NRC/industry effort to develop a fully risk-informed set of standard TS (RI-STS). Participants include all four owners groups, NEI, EPRI and contractors. At this time, seven initiatives have been identified:

   Define hot shutdown (PWRs) as preferred end state for TS actions

   Increase the time allowed to delay entering required actions when a surveillance is missed

   Modify existing mode restraint logic to allow greater flexibility (for example, use risk assessments for entry into higher mode LCOs based on low risk)

   Replace current system of AOTs with reliance on a configuration risk management program

   Optimize surveillance requirements

   Modify LCO 3.0.3 actions and timing by extending minimum time to begin LCO 3.0.3 shutdown from 1 hour to 24 hours and allowing for a risk-informed evaluation to determine whether it is better to shut down or continue to operate

   Define actions to be taken when equipment is not operable but is still functional.

   No rule changes are anticipated related to these seven initiatives. Most initiatives will be pursued generically as changes to the STS. A lead plant has been identified for six of these initiatives.

4. Questions were asked related to Task Interface Agreements (TIAs) between regional offices and NRR. NRR policy on releasing to the public copies of TIAs when they are first issued by a regional office are currently being revised, and public release is being considered. Project manager (PM) activities on TIAs are billed directly to licensees under PA Code 111C (see next question). Other NRR staff effort on TIAs is not directly billed.

5. Questions were raised regarding direct billing of NRR PM and technical staff labor. For docket-specific licensing actions (such as amendment requests, relief requests and exemptions), all PM and staff time is billed as one charge under "hourly costs." PM time for docket-specific generic activities such as generic letter and bulletin followup, and for TIAs, controlled correspondence, and other review functions is charged to PA Code 111C under "PM Costs." Other NRR staff time on these issues is not directly billed to licensees. PM efforts as a Lead PM on generic issues is not directly billed to licensees. Other PM effort which involves interfacing with headquarters, regional and licensee staff is directly billed to licensees under PA codes 111AAC, 111AAB and 111AAA, respectively, with charges reported under "PM Costs." Other NRR staff time under these codes is not directly billed to licensees.

If a PM works on another docket (but is not formally assigned to that docket), time would be directly billed to that docket for specific licensing actions or inspections only. Other activities on that docket would not be directly billed.

General guidance regarding PM labor billing includes the following:

(a) Non-docket specific activities directly billed under Part 170 (for assigned PM only) include:

9A1A General administration
9A1B Management supervision
9A1C General correspondence
9A1E Staff development/meetings (includes training)
9A1F Travel (for training, professional meetings and seminars)
9A1H Technical coordination
9A1K Support to other organizations (not issue-specific)
9A1N Financial management
9A1P Information technology overhead

If a PM is assigned to more than one docket, these charges are prorated between the dockets.

(b) Non-docket specific activities NOT directly billed under Part 170 include:

9A1G Freedom of information act activities
9A1J Union activities
9A1M Partnerships (labor/management)
9A2 Absence
111H Regulatory improvements
111J Rulemaking

LICENSING WORKSHOP

Licensing Process – NRC Perspective

DIVISION OF LICENSING PROJECT MANAGEMENT
OFFICE OF NUCLEAR REACTOR REGULATION

OFFICE LETTER 803

- WORK PLAN
- PUBLIC NOTIFICATION
- SAFETY EVALUATION
- AMENDMENT ISSUANCE

WORK PLAN

- REVIEW APPLICATION FOR COMPLETENESS AND ACCEPTABILITY
  - OATH & AFFIRMATION
  - CLEAR DESCRIPTION OF AMENDMENT
  - REQUESTED REVIEW SCHEDULE
  - TECHNICAL SPECIFICATION PAGES

WORK PLAN (continued)

- REVIEW APPLICATION FOR COMPLETENESS AND ACCEPTABILITY (continued)
  - SAFETY ANALYSIS AND JUSTIFICATION FOR PROPOSED CHANGE
  - NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC)
  - SEARCH FOR PRECEDENTS

WORK PLAN (continued)

- PRIORITY OF LICENSE AMENDMENTS
  - SAFETY CONCERNS
  - PLANT SHUTDOWN, OR RESTART
  - RISK INFORMED LICENSING ACTION
  - MAINTAIN SAFE PLANT OPERATIONS
  - COST BENEFICIAL LICENSING ACTIONS

PUBLIC NOTIFICATION

- 10 CFR 50.91
- 30 DAY PUBLIC NOTIFICATION, 10 CFR 50.91(a)(2)
  - NSHC
  - SEEKS PUBLIC COMMENT FOR 30 DAY TIME FRAME
  - FEDERAL NOTICE PUBLISHES PROPOSED LICENSE AMENDMENT AND NSHC DETERMINATION

PUBLIC NOTIFICATION (continued)

- EMERGENCY AND EXIGENT PUBLIC NOTIFICATIONS
  - REQUIRES JUSTIFICATION AND NSHC
  - EXIGENT 10 CFR 50.91(a)(6)
    - SEVEN TO THIRTY DAY TIME FRAME
    - TWO WEEK COMMENT PERIOD

PUBLIC NOTIFICATION (continued)

- EMERGENCY AND EXIGENT PUBLIC NOTIFICATIONS (CONTINUED)
  - EMERGENCY 10 CFR 50.91(a)(5)
    - NOTICE OF LICENSE AMENDMENT PROVIDES OPPORTUNITY FOR COMMENTS

SAFETY EVALUATION

- TECHNICAL SAFETY AND LEGAL BASIS OF AMENDMENT REQUEST
  - FINAL NSHC DETERMINATION INCLUDED
- REQUESTS FOR ADDITIONAL INFORMATION
- CONTACT STATE FOR ANY COMMENT TO NSHC
- PUBLIC COMMENTS OR PETITIONS IF RECEIVED

AMENDMENT ISSUANCE

- OBTAIN STAFF CONCURRENCE
- SUBMIT NOTICE OF LICENSE AMENDMENT TO FEDERAL REGISTER

AMENDMENT ISSUANCE (continued)

- SEND LETTER TO LICENSEE WITH FOLLOWING ENCLOSURES
  - REVISED TECHNICAL SPECIFICATION PAGES
  - INPUT TO FEDERAL REGISTER
  - SAFETY EVALUATION WITH EA, IF APPROPRIATE

1

10 CFR 50.55a
Codes and Standards

RELIEF REQUESTS

Allen G. Hansen
NRC Project Manager

2

10 CFR 50.55a TOPICS

- 50.55a(c) Reactor coolant pressure boundary
- 50.55a(d) Quality group B components
- 50.55a(e) Quality group C components
- 50.55a(f) Inservice Testing (IST)
- 50.55a(g) Inservice Inspection (ISI)
- 50.55a(h) Protection systems

3

RELIEF OPTIONS (1 of 2)

Alternatives to Code Requirement Proposed by Licensee

- 50.55a(a)(3)(i) Acceptable level of quality and safety
- 50.55a(a)(3)(ii) Hardship or unusual difficulty without a compensating increase in quality of safety

7

RELIEF GUIDANCE

General

- If licensee submits multiple justifications, NRC will select the most applicable 50.55a section only
- NRC can only authorize what licensee proposes in writing
- NRC-granted relief period can not exceed licensee request
- NRC denial - licensee can request higher NRC management involvement

8

RELIEF GUIDANCE

Impractical / burden

- Inaccessible
- Major plant modification
- High potential for plant trip/require shutdown
- Potential system or component damage
- Personnel hazards/major ALARA concerns
- Technology inadequate

9

RELIEF GUIDANCE

Hardship / unusual difficulty

- Minor hardware changes
- Temporary modifications
- Multiple TS LCOs
- High cost
- ALARA concerns

10

GUIDANCE - 50.55a(a)(3)(i)

NRC authorize proposed alternative if acceptable level of quality and safety

- List Code edition/addenda/requirement/ interval/affected components
- Describe alternative and details of basis
- State why alternative provides acceptable level of quality and safety
- Specify duration
- Do not specify impracticality / burden / unusual difficulty / hardship

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GUIDANCE - 50.55a(a)(3)(ii) (1 of 2)

NRC authorize proposed alternative if hardship or unusual difficulty without a compensating increase in quality/safety

- If IST - determination that alternative provides reasonable assurance that component/system is operationally ready
- If ISI - determination that alternative provides reasonable assurance of pressure boundary integrity

12

GUIDANCE - 50.55a(a)(3)(ii) (2 of 2)

- List Code edition/addenda/requirement/ interval/affected components
- Describe alternative and details of basis for request
- Specify duration
- Do not specify impracticality

13 GUIDANCE - 50.55a(f)(6)(i) (1 of 2)

IST - NRC grant relief and, if necessary, impose alternative requirements

- Determination that code requirement is impractical
- Alternative provides reasonable assurance that component is operationally ready
- 50.55a(f)(6)(i) allows NRC to impose additional requirements without licensee commitment ... 50.55a(a)(3) does not allow this

14 GUIDANCE - 50.55a(f)(6)(i) (2 of 2)

- Indicate Code edition/addenda/requirement/ interval/affected components
- Describe proposed alternative and bases
- Describe why impractical to comply
- Describe burden if compliant
- Basis for reasonable assurance that component is operationally ready
- Specify duration of the alternative
- Do not specify hardship or unusual difficulty

15 GUIDANCE - 50.55a(g)(6)(i) (1 of 2)

ISI - NRC grant relief and, if necessary, impose alternative requirements

- Determination that code requirement is impractical
- Proposed exam provides reasonable assurance of boundary integrity
- 50.55a(g)(6)(i) allows NRC to impose additional requirements without licensee commitment ... 50.55a(a)(3) does not allow this

16 **GUIDANCE - 50.55a(g)(6)(i) (2 of 2)**

- Guidance in Generic Letter 90-05 (temporary non-Code repairs)
- List Code edition/addenda/requirement/ interval/affected components
- Describe proposed alternative and bases
- Describe why impractical/burden
- Basis for exam providing reasonable assurance of boundary integrity
- Specify duration of the alternative
- Do not specify hardship or unusual difficulty

17 **50.55a(g)(6)(ii)(A)(5) NOTE**

For augmented reactor vessel shell weld examination reliefs, NRC can authorize a proposed alternative if the staff determines that the alternative provides an acceptable level of quality and safety (rather than the Code requirement being impractical).

18 **QUIZ**

- Design limitations
- Radiation exposure
- Personnel safety
- Potential plant trip
- Power reduction / shutdown

REFERENCES

NUREG-1482:

www.nrc.gov/NRC/NUREGS/SR1482/index.htm

Information Notice 98-42:

www.nrc.gov/NRC/GENACT/GC/IN/1998/index.html

10 CFR 50.55a:

http://www.access.gpo.gov/nara/cfr/cfr-retrieve.html#page1

New NRR office letter to be issued

AGENCYWIDE DOCUMENTS ACCESS & MANAGEMENT SYSTEM (ADAMS)

NRC/CP&L WORKSHOP

MAY 31- JUNE 1, 2000

WHAT IS IT?

- MAINTAIN READ-ONLY RECORDS THAT CAN BE READ FROM MULTIPLE SITES
- FULL TEXT SEARCH CAPABILITY BY NRC AND PUBLIC
- ELECTRONIC DOCUMENTS BECOME OFFICIAL RECORD
- REPLACES NUDOCS

STATUS

- 11/1/99 - STEPPED IMPLEMENTATION STARTED WITH SCANNING OF DOCUMENTS INTO ADAMS - PAPER COPIES REMAINED OFFICIAL RECORD
- 1/1/00 - NRC STAFF COMMENCED ENTERING INTERNAL DOCUMENTS INTO ADAMS - PAPER COPIES REMAIN OFFICIAL RECORD

4

RELIEF OPTIONS (2 of 2)

Impracticality Demonstrated
By Licensee

- 50.55a(f)(6)(i) Inservice Testing
- 50.55a(g)(6)(i) Inservice Inspection

5

NRC AUTHORIZATION (1 of 2)

NRC-Authorized
Licensee-Proposed Alternatives

- 50.55a(a)(3)(i) Acceptable level of quality and safety
- 50.55a(a)(3)(ii) Hardship or unusual difficulty w/o compensating increase in the level of quality and safety

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NRC AUTHORIZATION (2 of 2)

NRC Relief Granted And
Imposition of Alternative

- 50.55a(f)(6)(i) IST - code requirement is impractical
- 50.55a(g)(6)(i) ISI - code requirement is impractical

STATUS (cont)

- APRIL 1, 2000 - TERMINATE PAPER RECORDKEEPING -ADAMS DOCUMENTS ARE OFFICIAL RECORDS
  - TERMINATE PAPER DISTRIBUTION OF INCOMING DOCUMENTS, WITH LIMITED EXCEPTIONS
  - LIVING DOCUMENTS (TECH SPECS, UFSAR) WILL CONTINUE TO HAVE PAPER DIST.

ELECTRONIC INFORMATION EXCHANGE (EIE)

- FUTURE SYSTEM TO PROVIDE ELECTRONIC DOCUMENT EXCHANGE TO AND FROM NRC
- PARTICIPATION IS VOLUNTARY
- THREE PLANT PILOT PROGRAM UNDERWAY (Vermont Yankee, Grand Gulf and Calvert Cliffs)

PARTICIPATION IN EIE

- MUST HAVE ACCESS TO INTERNET VIA INTERNET EXPLORER OR NETSCAPE
- APPLY FOR AND BE GRANTED A "DIGITAL CERTIFICATE".
- 5 MEG (1000 PAGES) LIMIT. LARGER DOCUMENTS WITH PRIOR NOTICE.

PARTICIPATION IN EIE (cont)

- DOCUMENT SUBMITTALS:
  - PDF NORMAL
  - PDF
  - WORD
  - WordPerfect
- MAY BE EXPANDED LATER (ASCII)

EIE PROCESS

- ELECTRONICALLY SIGN DOCUMENT
- PLACE ON EXTERNAL SERVER
- SEND EMAIL TO RECIPIENT
- NO PUBLIC ACCESS TO EIE

EXTERNAL ACCESS

- ACCESS NRC EXTERNAL WEB (NRC.GOV)
- CLICK ON "PUBLIC ELECTRONIC READING ROOM" AT BOTTOM OF PAGE
- FOLLOW INSTRUCTIONS OR CALL LISTED NUMBERS FOR HELP

SENSITIVE INFORMATION

- PROPRIETARY, SECURITY, PRIVACY INFORMATION PROTECTED BY ADAMS PROCEDURES AND SOFTWARE
- SAFEGUARDS INFORMATION WILL NOT BE INCLUDED IN ADAMS

NUDOCS

- DOCUMENTS PRIOR TO 11/1/99 WILL CONTINUE TO BE KEPT IN MICROFICHE
- WILL NOT BE CONVERTED TO ADAMS
- CAN SEARCH FOR DOCUMENT BY TITLE IN ADAMS LEGACY LIBRARY

QA PROGRAM CHANGES

Richard P. Correia
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301.415.1009

10CFR50.54(a) DIRECT FINAL RULE

- Types of changes that are not reductions in commitment:
  - Adoption of newer endorsed standards
  - Adoption of changes approved by an NRC SE with bases applicable to the licensee's facility
  - Use of generic position titles
  - Use of generic organizational charts
  - Elimination of language that duplicates the Reg Guide or standard to which the licensee is committed
  - Organizational revisions that maintain the requisite independence

QAP CONSOLIDATION CONSIDERATIONS

- Proposed changes may not be reductions in commitment because of consistency with individual plant's approved QAP
- Duplication of commitments & requirements can be minimized by crediting referenced material to explain how Appendix B requirements are met
- Organizational titles and arrangements can be described in general terms with sufficient detail to ensure Appendix B requirements are satisfied
- Repeated general requirements can be combined into common statements that are applicable throughout the QAP (i.e., reduce redundancy)
- **BOTTOM LINE:**
  - show how Appendix B requirements are met,
  - refer to previously approved QAPs (use both application and SE)
  - attend June 7, 2000 workshop
  - contact NRR QA staff (301.415.1017)

NOED GUIDANCE

Herb Berkow
Director, Project Directorate II
Division of Licensing Project Management

CP&L Licensing Workshop
May 31 - June 1, 2000

RESOLUTION OF T.S. NONCOMPLIANCE BY AMENDMENT

(1) Regular Amendment

(2) Exigent Amendment

(3) Emergency Amendment

(4) NOED

NOED DURATIONS

REGIONAL

Requested and Granted For Specified Period ≤ 14 Days

NRR

No Time Limit; In Effect Until Superseded By Exigent Amendment - Normally 4 Weeks

WEATHER OR NATURAL EVENT- RELATED NOEDs

- Simplified Process
- Previously: Enforcement Discretion -
  Prior Commission Approval
- Now: Staff Issued NOED
- Finding of "Emergency Situation" By Government Entity
  Or Responsible Independent Entity
- Risk-Informed - Balance of Public H & S Benefits
  Vs. Radiological Risk
- If Problem Is a Degraded System or Component, Even if Caused by
  Weather, Regular NOED Request Is Appropriate
- Electrical Grid Problems Prerequisite For Weather-Related NOED

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

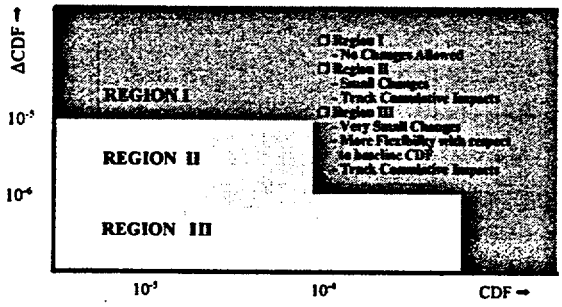
- RG 1.174 Changes to licensing basis
- RG 1.175 Inservice Testing
- RG 1.176 Graded Quality Assurance
- RG 1.177 Technical Specifications
- RG 1.178 Inservice Inspection

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: ~130
  - Approved to date: ~70
  - Withdrawn: 16

Management Oversight

- Risk-Informed Licensing Panel
  - Policy review
  - 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

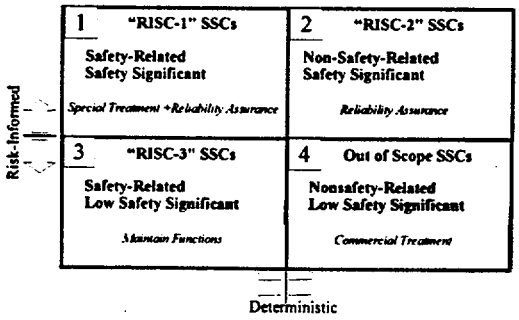
Risk-Informed Part 50

- 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

Risk Categorization and Regulatory Treatment



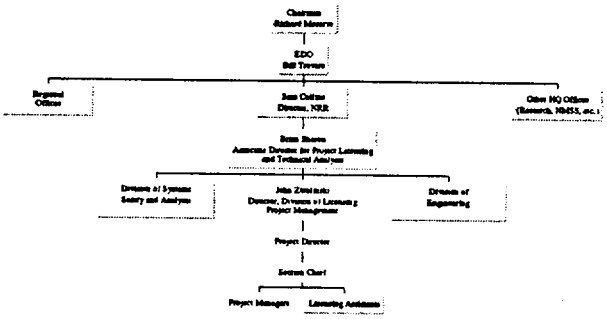
Risk-Informed Part 50 (cont.)

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

DLPM PROJECT MANAGER RESPONSIBILITIES

Ram Subbaratnam
PM Section 2 - Project Directorate II
Division of Licensing Project Management

DLPM ORGANIZATION



BACKGROUND

- Generally, one Project Manager per site
- PM assignments are for a maximum of 5 years
- Educational background is typically engineering
- Experience is varied (nuclear industry, regional inspectors, other NRC offices)

EXPECTATIONS

- Most knowledgeable member of the staff regarding the licensing agenda for assigned facility
- Knowledgeable of plant design and operation
- Thorough understanding of NRC rules, processes and licensing requirements
- Focal Point for NRC/Licensee Correspondence
- Prioritize, Schedule, Review, Manage & Prepare all actions associated with the licensing process
- Maintain NRC information management systems

PERFORMANCE MEASURES

- Timeliness
- Effectiveness
- Efficiency
- Quality
- Quantity

STRATEGIC OUTCOME GOALS

- Maintain Safety
- Reduce Unneccessary Regulatory Burden
- Increase Public Confidence
- Increase Internal Efficiency & Effectiveness

DLPM IMPLEMENTING PLAN

- Licensing Authority
- Interfaces
- Regulatory Improvements
- Total of 75 Specific Tasks

LICENSING AUTHORITY

- Licensing Actions
- Mandated Controls
- Other Licensing Tasks

LICENSING ACTIONS

- License Amendments (TS & USQ)
- Exemptions
- Relief Requests
- License Transfers
- NOEDs
- Lead Plant Reviews

MANDATED CONTROLS

- TS Bases Changes
- UFSAR Reviews (10 CFR 50.71(e))
- Facility Changes (10 CFR 50.59)
- QA, Security, EP Program Reviews

OTHER LICENSING TASKS

- Pre-Application Reviews
- Task Interface Agreements
- 10 CFR 2.206 Petitions
- Plant-Specific Multi-Plant Actions
- Commitment Management
- Hearing Support
- Backfits
- Proprietary Information Reviews
- Topical Report Reviews

INTERFACES

- Licensee/Owners' Groups
- NRC Headquarters
- Regional Offices
- Public

LICENSEE/OWNERS' GROUP ACTIVITIES

- Routine Communications with Licensee
- Site Visits/Drop-ins
- Lead PM on Technical Issues (MPAs, GSIs, USIs)

HEADQUARTERS

- Management Info. & Status Reports
- Incident Response
- Miscellaneous Licensee Reports
- Fee Billing Reviews
- Surveys
- General Support to other NRC Offices

REGIONS

- Morning Plant Status Calls
- Management Oversight Panels
- Routine Communications
- TS Interpretations
- Enforcement Support
- Event Followup

PUBLIC

- Controlled Correspondence
- Noticing Amendments, meetings
- Allegations
- FOIA requests
- Plant Information on NRC Web page

REGULATORY IMPROVEMENTS

- Licensing Action Task Force
- Owners' Group Interactions
- NRR Office Letters
- NRR Reinvention Effort
- Rulemaking (Risk Informing Part 50)
- Task Forces (ADAMS, Public, Y2K)
- Licensing Workshops

PAYMENT OF FEEs

- 10 CFR 170.12(b)(1) - licensing fees
- 170.12(b)(1)(iv) - new provision for project managers (PM)
  - The full cost for PMs assigned to a specific plant or facility, excluding leave time and time spent on generic activities (e.g., rulemaking)
- Licensees pay 100% of all docket specific hours , both fee recoverable and non-fee recoverable
- Licensees do not pay for backup PMs time
- Non-docket specific fees for PMs assigned to multiple plants will be divided by the number of plants assigned

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LICENSEES: CAROLINA POWER & LIGHT COMPANY
FLORIDA POWER CORPORATION

June 29, 2000

FACILITIES: BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
CRYSTAL RIVER, UNIT 3
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2
SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1

SUBJECT: MEETING SUMMARY OF NRC/CP&L/FPC LICENSING WORKSHOP

The Nuclear Regulatory Commission (NRC) and Carolina Power & Light Company (CP&L) jointly sponsored a licensing workshop on May 31 and June 1, 2000, in Cary, North Carolina. Two representatives from Florida Power Corporation (FPC) also attended the workshop. The goals of the workshop included improving the quality of licensing submittals, raising the level of knowledge and understanding of the regulatory process, and enhancing the interface between licensees and the NRC. Major topics of discussion included the licensing process from both the NRC and the licensee perspective, the attributes of a good relief request, information on NRC document control and processing (ADAMS) and electronic information exchange, an overview of the revised quality assurance rule, a discussion of notices of enforcement discretion, attributes of a high quality license amendment request, agency activities regarding risk informed licensing actions and rulemaking, the role of the NRC project manager, and fee billing for project manager labor.

Enclosure 1 is a list of workshop attendees, Enclosure 2 is an analysis of the feedback received from workshop attendees, Enclosure 3 is a list of the attributes of a high quality license amendment request as developed by the attendees during breakout sessions at the workshop, Enclosure 4 includes answers to questions posed during the workshop, and Enclosure 5 contains copies of the workshop handouts. Questions or comments concerning the workshop may be directed to Allen Hansen, Project Manager, at (301) 415-1390 or AGH@NRC.GOV.

/RA/

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Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-325, 50-324, 50-302, 50-261, 50-400

Enclosures:
1. List of Attendees
2. Feedback Analysis
3. Attributes of a High Quality License Amendment Request
4. Answers to Workshop Questions
5. Workshop Handouts

cc w/encls: See next page

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