

From: "FARRELL, Clifton" <CWF@nei.org>
To: "hma@nrc.gov" <hma@nrc.gov>, "btm1@nrc.gov" <b...>
Date: Fri, Sep 1, 2000 10:47 AM
Subject: September 12th Public Meeting on NUREG-1520

Dear Heather:

This E-mail provides you with several documents that we shall likely discuss at the September 12th SRP meeting. It also offers a few comments on what industry would like to see placed on the meeting agenda. I am planning to be on vacation next week and so shall not see the agenda until the day before we meet -- and so I thought I would pass along a few comments today.

A. MEETING DOCUMENTS

This E-mail contains six documents that are relevant to the September 12th meeting on the Part 70 SRP. I am sending them in "red-lined" format so that you can easily see what changes we are proposing. These documents should be used in place of a couple of those referenced in Barry Mendelsohn's E-mail yesterday announcing the September meeting.:

(1) Industry's revision of Chapter 11 (3 documents: [introductory comments](#), ["red-lined" version](#), ["cleaned" version](#))

<<[SRP-11 Explanatory Notes.pdf](#)>> <<[SRP-11 Raw Edits.pdf](#)>> <<[SRP-11 Clean Revision.pdf](#)>>

(2) Revised ISA Summary Guidance Document (2 documents: ["red-lined" version](#), ["cleaned" version](#))

<<[ISA Summary Redline.pdf](#)>> <<[ISA Summary Cleaned.pdf](#)>>

(3) Facility Change Process Guidance Document (1 document, 2 formats: [MS-Word](#), [PDF](#))

<<[Change Process Guidance Document.doc](#)>> <<[Change Process Guidance Document.pdf](#)>>

B. AGENDA TOPICS

Based upon what transpired at the [August 3rd meeting](#), we feel there are at least five items that should be discussed at the September 12th meeting. In approximate decreasing order of importance, these will be:

(1) NRC Management Measure Examples: these will be the examples the NRC has developed over the last couple of months to show how descriptions of management measures in current licenses need to be enhanced (or expanded)

upon) to meet staff expectations for the new Subpart H. You mentioned that existing NRC-approved licenses would meet anywhere from 50% to 80% of the new management measure requirements. We are interested to see how existing licenses can be revised with the missing 20-50%. Industry has made its own attempt to address this concern by examining the commitments in 7 existing licenses for the Maintenance Management Measure and then adding additional material we believe Subpart H requires. This example is provided in Appendix B of the [ISA Summary Industry Guidance Document](#).

(2) Revised SRP Chapter 11 several industry concerns with the [July 2000 NRC revision of SRP Chapter 11](#) were discussed and taken under advisement by the NRC. We look forward to hearing the results of these considerations. Industry has prepared its [own revision of Chapter 11](#) (submitted above). We look forward to discussion of these improvements -- and to closure on a revised Chapter 11.

(3) Revised Industry Guidance Document on ISA We have revised the Industry Guidance Document on Preparation of the ISA Summary based on written [comments prepared by the NRC](#) (and discussed at the August 3rd meeting) and revisions (simplifications) proposed by licensees.

(4) Revisions to SRP Chapter 3 We understand that several significant changes have been made to, or are planned for, SRP Chapter 3. Bob Pierson indicated that these changes would be distributed to stakeholders for comment. Even if the written changes are not yet available for stakeholder review by September 12th, we should appreciate hearing from the staff what changes are being contemplated.

(5) Industry Guidance on the [Facility Change Process](#) industry has prepared a guidance document for application of the 10 CFR 70.72 facility change process. We look forward to hearing NRC comments on this document.

We hope that the documents provided this morning will be useful and that you and your colleagues will have sufficient time to prepare for the September 12th public meeting. It would be very helpful to industry if you could also send us any staff papers relevant to the meeting -- for example, your management measure summaries and revisions to SRP Chapter 3 -- within the next few days.

Please do be in touch today if you experience any troubles downloading or posting the attached PDF/MS-Word documents.

Best Regards,
Clifton

CC: "KILLAR, Felix" <fmk@nei.org>, "FERTEL, Marvin" <m...

Mail Envelope Properties

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Subject: September 12th Public Meeting on NUREG-1520
Creation Date: Fri, Sep 1, 2000 10:44 AM
From: "FARRELL, Clifton" <CWF@nei.org>

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Files	Size	Date & Time
MESSAGE	4149	Friday, September 1, 2000 10:44 AM
SRP-11 Explanatory Notes.pdf	19160	
SRP-11 Raw Edits.pdf	266663	
SRP-11 Clean Revision.pdf	113978	
ISA Summany Redline.pdf	188113	
ISA Summary Cleaned.pdf	149906	
Change Process Guidance Document.doc	130560	
Change Process Guidance Document.pdf	64997	
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