

October 3, 2000

LICENSEES: South Carolina Electric & Gas Company
Dominion Energy Company

FACILITIES: V. C. Summer Nuclear Power Station
North Anna Nuclear Station, Units 1 and 2
Surry Nuclear Power Station, Units 1 and 2

SUBJECT: SUMMARY OF COUNTERPARTS MEETING HELD ON MAY 9-10, 2000,
BETWEEN NRC/SCE&G/DOMINION ENERGY

The Nuclear Regulatory Commission (NRC), South Carolina Electric & Gas Company (SCE&G), and Dominion Energy jointly sponsored a licensing workshop on May 9-10, 2000, at Dominion Energy's Innsbrook Center in Glen Allen, Virginia. The goals of the workshop included improving the quality of licensing submittals, raising the level of knowledge of regulatory processes, and enhancing the licensing interface between the licensee and the NRC staff.

The major topics of discussion included an overview of various regulatory processes such as license amendment and relief request reviews, updates on the status of significant regulatory activities such as ADAMS, streamlining the licensing process, the Consolidated Line Item Improvement Process, 10 CFR 50.72/50.73 Reporting, Office of Nuclear Reactor Regulation project manager responsibilities, information on electronic information exchange, licensee submittal breakout discussions, and related regulatory topics. A copy of the workshop agenda and presentation materials are available under ADAMS Accession Number ML003753814. Enclosure 1 is a list of attendees at the workshop. Enclosure 2 is an analysis of the feedback forms received after the workshop. Enclosure 3 is a list developed during the workshop of the attributes of a quality license amendment application. Enclosure 4 is a list of questions raised during the workshop.

Please direct any inquiries concerning this workshop to me. I can be reached at 301-415-1438.

/RA/

Karen Cotton, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-395, 50-338, 50-339,
50-280, and 50-281

Enclosures: 1. List of Attendees
2. Feedback Form Analysis
3. Attributes of a Quality Submittal
4. List of Questions and Answers

cc w/encls: See next page

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NRC/SCANA/Dominion Counterparts Meeting
May 9-10, 2000

Location: Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, VA 23060

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DOMINION ENERGY/SCANA WRITTEN FEEDBACK ANALYSIS

Feedback forms were issued as part of the workshop and all attendees were requested to complete the forms so that improvements could be made for future workshops. Twelve forms were returned. The following are general trends or highlights:

1. The average overall rating for the workshop was approximately 8, which fell into the "Very Good" category.
2. The responses were positive concerning the overall format and context of the workshop.
3. Typical responses to the question, "What were the workshop's strengths?" included:
 - excellent and active participation; and
 - communication among the licensee staffs and the NRC staff.
4. Typical responses to the question, "What were the workshop's weaknesses?" included:
 - lack of PSA expectation/experiences from the NRC staff;
 - limited time allowed for regulatory initiatives discussions; and
 - lack of new information.
5. A representative licensee response to the question "How will you use what you've learned at the workshop?" was: "The guidelines provided will help improve the quality of the submittals." (Similar comment from licensing and engineering staff.)
6. The general consensus for the most desirable frequency for these workshops was once every 2 years.
7. Other comments included:
 - low expectations were dispelled;
 - enjoyed and appreciated the open dialog; and
 - Good Job!!!

**LICENSING COUNTERPARTS MEETING
SCANA/DOMINION
MAY 9-10, 2000**

ATTRIBUTES OF A GOOD LICENSING SUBMITTAL

Cover Letter

- Specific title and system
- Regulation impacted
- What's being proposed
- Positively stated implementation date - if not 30 days, explain why it is different
- Specified licensing action need date (what, when)
- Proprietary identification
- Attachments identified
- Commitments identified
- Oath & affirmation
- Risk-based submittal identified
- Contact name in letter
- Previous significant communications
- Safeguards identification
- Pending/interaction with other amendment requests

No Significant Hazards

- No acronyms
- Self-sufficient/introduction and overview
- 3 criteria questions verbatim restated
- Minimize numbers
- Avoid "catch phrases" as justification

RAI Response

- RAI response should address No Significant Hazards
- Documentation of draft questions that have been sent to the licensee
- Oath and affirmation if Tech Spec revised

Tech Spec Attachment

- Marked-up pages
- Proposed/retyped pages
- Discussion of change
 - any physical change identified
 - reference to UFSAR section
 - identifying changes
 - generic guidance
 - precedents

- reference SRP
- Consistency with ITS and/or Regs
- Risk-informed consideration
- Drawing/schematic as appropriate
- Safety or operational concern

- Conclusion paragraph
- Licensing/Design Basis
- Introduction/background
- Environmental Assessment

Attachment - Other

- Tabulation page changes
- Proprietary information
- Commitment statements/compensatory measures
- Description and the “why” of change
- Reference/methodology usage

NRC Safety Evaluation Reports

- Any questions ☎ call PM
- If unclear, fix it
- Bases of decision

Questions and Answers

1. Q. Why are TIAs billed to the licensee?
A. TIAs are not billed to the licensee.

2. Q. What is the real time account of hours billed to the licensee?
A. All hours charged to the licensee through 111B activities are real-time. Public Law 101-508, the Omnibus Budget Reconciliation Act of 1990 (OBRA-90), enacted November 5, 1990, required that the NRC recover approximately 100 percent of its budget authority, less the amount appropriated from the Department of Energy (DOE) administered NWF. The NRC assesses two types of fees to recover its budget authority. First, license and inspection fees, established at 10 CFR Part 170 under the authority of the Independent Offices Appropriation Act (IOAA), 31 U.S.C. 9701, recover the NRC's costs of providing individually identifiable services to specific applicants and licensees. Examples of the services provided by the NRC for which these fees are assessed are the review of applications for the issuance of new licenses, approvals or renewals, and amendments to licenses or approvals. Second, annual fees, established in 10 CFR Part 171 under the authority of OBRA-90, recover generic and other regulatory costs not recovered through 10 CFR Part 170 fees.

3. Q. Verify what needs to be docketed regarding an RAI.
A. All the information, the request and the answer, must be docketed and returned to NRC under oath and affirmation

4. Q. Is the staff safety evaluation part of the licensee's licensing basis?
A. No, per the definition of the current licensing basis as defined in Part 54, only the commitments documented in the NRC safety evaluation are a part of the licensing basis.

5. Q. Is Configuration Risk Management Program (CRMP) required to be in the TS?
A. According to Staff Requirements Memorandum 98-067, dated June 29, 1998, relating to the Maintenance Rule, the staff was directed to make preparation to expeditiously remove the CRMP from plant-specific TS once the Maintenance Rule changes become effective, since an appropriate configuration management program would then be required by the Maintenance Rule. In the interim, alternatives to

including the CRMP description in the TS Administrative Controls would be effective and would be more efficient since this would eliminate the need for another license amendment to remove the CRMP description from TS at a later time. Therefore, licensees are allowed to place the CRMP description in a location other than the plant TS.

6. Q. If a change is made to the FSAR (i.e, a drawing), has the FSAR been changed?
 - A. Yes, a revision of the original FSAR containing those original pages that are still applicable plus new replacement pages shall be filed within 24 months of either July 22,1980, or the date of issuance of the operating license, whichever is later, and shall bring the FSAR up to date as of a maximum of 6 months prior to the date of filing the revision. The updated FSAR shall be retained by the licensee until the Commission terminates their license.

7. Q. How does the 50.59 Rulemaking impact recordkeeping?
 - A. The records of changes in the facility shall be maintained until the date of termination of the license, and records of changes in procedures and records of tests and experiments shall be maintained for a period of 5 years.

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