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Rules and Directives
Branch
(1175)

January 19, 2001

Chief, Rules and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, D.C. 20555-0001

Gentlemen:

**NUCLEAR REGULATORY COMMISSION (NRC) - PROPOSED INFORMATION
COLLECTION INITIATIVE (VOLUME 65 FEDERAL REGISTER 76669)**

The Tennessee Valley Authority (TVA) appreciates the opportunity to comment on the proposed subject published in the December 7, 2000 *Federal Register*. TVA supports NRC's continuing efforts to improve effectiveness and gain greater efficiency. The enclosure provides specific comments and suggestions relating to the implementation of the proposed voluntary information submittal initiative.

If you have any questions, please contact Susan Ferrell at (423) 751-7737.

Sincerely,

Mark J. Burzynski
Mark J. Burzynski
Manager
Nuclear Licensing

Enclosure

cc (Enclosure):

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ENCLOSURE

1. Pertaining to the necessity for the initiative, TVA feels that if the NRC Staff is able to maintain their current performance level of 95 percent of the licensee requests completed within one year, the need for a more complicated prioritization system may be an unnecessary administrative burden. Potential areas for additional efficiency improvement might be better focused in the area streamlining the review process. For example, eliminating the need for Office of General Counsel review of nonprecedence amendments.
2. Every plant pays a set fee each year. Each plant should thus receive a minimum level of review commensurate with that cost, regardless of rank or priority. If work assignments are based solely on priority, during a particular year, some plants could be left receiving services less than that covered by the minimum base fee due to the relative priority of their requests. It is recommended that a baseload number of licensee requests, supporting the annual fee, be scheduled for each unit. Only once that baseload is achieved, the ranking could be used to determine priority and schedule of additional requests.
3. The savings aspect of the ranking process needs to be based on an operating unit basis. If the savings are allowed to be cumulatively figured on a multi-unit submittal, then the submittals from the larger operating companies, who develop technical specification changes or other submittals for their many units would outrank the interests of smaller or single operating units.
4. The cost savings aspect of the ranking is subject to the potential for exaggeration. This factor should be based on either a set of consistent labor rates used by all or should be equated in total man hours. Forecasts on equipment outage reductions should be based on industry history or use frequencies numbers consistent with the site's probabilistic safety assessment/maintenance rule analyses. Guidelines need to be developed that provide details on what is to be included as a part of the cost savings and how that number is to be derived in order to ensure an adequate level of consistency between submitting sites.