

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 9, 2001

MEMORANDUM TO: William F. Kane

Deputy Executive Director

for Reactor Programs

FROM:

Patrick L. Hiland

Regional Operations and

Program Management Section, OEDO

SUBJECT:

SUMMARY OF MARCH 20, 2001, PUBLIC MEETING WITH THE

NUCLEAR ENERGY INSTITUTE ON MUTUAL ITEMS OF INTEREST

On March 20, 2001, senior managers of the Nuclear Energy Institute (NEI) met publicly with senior managers of the Nuclear Regulatory Commission (NRC) at NEI's offices in Washington, D.C. The purpose of the meeting was to provide an opportunity for the senior managers of both organizations to discuss items of current interest to the nuclear industry.

Attachment 1 provides a summary of the meeting, with associated handouts enclosed.

Attachment 2 is a list of meeting attendees.

Attachments: As stated

cc w/attachments: See next page CC:

Mr. Ralph Beedle Senior Vice President and Chief Nuclear Officer Nuclear Energy Institute 1776 I Street, NW Suite 400 Washington, DC 20006-3708

Mr. Alex Marion, Director Programs Nuclear Energy Institute 1776 I Street, NW Suite 400 Washington, DC 20006-3708

Mr. James Davis, Director Operations Nuclear Energy Institute 1776 I Street, NW Suite 400 Washington, DC 20006-3708

Mr. Tony Pietrangelo, Director Licensing Nuclear Energy Institute 1776 I Street, NW Suite 400 Washington, DC 20006-3708

Mr. Steve Floyd, Director Regulatory Reform and Strategy Nuclear Energy Institute 1776 I Street, NW Suite 400 Washington, DC 20006-3708

Mr. Dave Modeen, Director Engineering Nuclear Energy Institute 1776 I Street, NW Suite 400 Washington, DC 20006-3708

Mr. Robert Bishop, General Counsel Nuclear Energy Institute 1776 I Street, NW Suite 400 Washington, DC 20006-3708

Ms. Lynette Hendricks, Director Plant Support Nuclear Energy Institute 1776 I Street, NW Suite 400 Washington, DC 20006-3708

SUMMARY OF NRC/NEI SENIOR MANAGEMENT MEETING March 20, 2001

The summary below is presented in order of the original agenda topics, and provides a brief description of comments made by the meeting attendees. Handouts provided at the meeting are referenced in the summary and included as Enclosures A-E to this attachment.

1. Materials Reliability Program

The NRC noted that industry's response to the V.C. Summer nozzle weld cracking and the Oconee control rod drive mechanism reactor vessel head cracking was good. Both of these issues were captured in the materials reliability program (MRP), and the NRC inquired as to the status of continued support from industry on this topic.

NEI responded that industry was committed to MRP, and an industry meeting was to be held Friday, March 30, 2001. NEI further stated their intention to continue to work with industry on this topic, and NEI was not aware of any funding concerns.

2. Spent Fuel Inventory - Availability of Certified Casks

The NRC opened the discussion on this topic by providing the current status on dry cask storage designs, dry cask designs certified for dual-purpose, and current activities underway in the dry cask certification area. The NRC then summarized some current issues and concerns related to dry cask storage with a potential for significant impact. These issues included the staff's workload increase due to non-fuel usage of casks (e.g, burnable poison and assemblies), the resource constraint on the staff, the poor planning for spent fuel contents approval, and the lack of advanced user determination of the site parameters. The NRC requested that industry help the staff improve workload forecasting by defining all the types of fuel in storage; assessing the compatibility of certified casks to the various types of fuel; and, if current casks are not adequate, providing the NRC with industry's plan for storage of fuel.

NEI acknowledged the issues presented, and stated that activities currently underway included conducting a through-put analysis and a cask sensitivity analysis. NEI believed that consolidating amendment requests would be difficult. However, the Part 72.48 workshop was considered a success and standard technical specifications could reduce some rulemaking. Both of these initiatives were believed to improve the process. NEI was willing to further discuss the issues raised by the NRC. NEI also inquired about the status of its petition for rulemaking to streamline the cask certification process. NRC responded that this petition is currently under consideration and the decision is being tracked as an agency action item.

ACTION ITEM: NEI and NRC agreed to identify opportunities to reduce the number of exemption requests and to consolidate amendment requests in order to reduce the impact on NRC resources. NEI will evaluate if there is an appropriate role for NEI to support the identified opportunities.

3. Decommissioning Issues

The NRC discussed the progress made and lessons learned from several decommissioning site activities at Trojan, Maine Yankee, Connecticut Yankee, and Yankee Rowe. Of particular note were the lessons learned to improve the process, including the need for early and frequent communications, design of final surveys, understanding that old records were often of poor quality, and recognizing that environmental impact reviews need to address non-radiological impacts. Another lesson learned, applicable both here and under Agenda Topic 2, "Spent Fuel Inventory - Availability of Certified Casks," was that licensees must continue to provide oversight of vendors during cask design and fabrication to ensure performance of structures, systems, and components as described in the Safety Analysis Report. Additionally, advance planning is important to avoid repetitive amendment requests.

NEI acknowledged the lessons learned through past decommissioning actions and stated they would continue to support industry. NEI was interested in fully understanding the lessons learned that were identified by the NRC.

ACTION ITEM: The NRC will work with NEI to develop a lessons learned document.

4. New plant licensing Issues

For this agenda topic, NEI provided a chart which was used to describe their recent initiatives. The NEI chart is included as **Enclosure A** to this attachment. A brief discussion was conducted by NEI describing their initial activities to support a plan to enable new plant business decisions. NEI stated their intent to provide more detail at an April 5, 2001 meeting.

The NRC acknowledged the usefulness of the information presented, and stated that some effort was underway to look at the regulatory framework. A specific interest from the NRC was the schedule and probability of new plant licensing. The NRC also inquired about Part 52 rulemaking and whether industry wanted the NRC to re-initiate action on this rulemaking, or wait for an industry proposal. NEI stated that they owed the staff an answer next week on that issue.

5. Risk-Informed Regulatory Initiatives

NEI started the discussion by opining that a lot of resources had been spent on low risk items. Also, NEI expressed significant concerns regarding the slow pace in implementing reactor PRA initiatives. NEI's presentation is included as **Enclosure** B to this attachment. NEI highlighted that the nuclear steam supply system owners group was ready to take action on Risk-informing Part 50, Options 2 and 3, and a decision by June 2001 would retain industry interest. Regarding Option 3, NEI noted industry's disappointment with the recent staff presentation to the Advisory Committee on Reactor Safeguards, which industry perceived as not supporting redefining a large break loss of coolant accident as a priority item.

The NRC acknowledged the comments from NEI and commented that a public meeting on 10 CFR 50.46 scheduled for spring 2001 would be an appropriate time to discuss these issues in more detail.

ACTION ITEM: NRC will schedule the public meeting, likely to be in the May 2001 time frame. In addition, the NRC intends to provide comments on NEI-00-04, "Option II Implementation Guidelines." to NEI within two weeks.

6. NRC Use of Codes and Standards

Due to meeting time constraints, this agenda topic had limited dialogue. NEI distributed a handout which is included in this attachment as **Enclosure C**. The handout summarizes the current ASME code acceptance process, a proposed schedule requiring revision to 10 CFR 50.55a, and a suggested alternative option for Code Cases.

7. Reporting Requirements in Regulations

Due to meeting time constraints, this agenda topic had limited dialogue. NEI distributed a list of current reporting requirements that they had previously identified to the staff as candidates for elimination or revision. NEI's distributed list on this agenda topic is included in this attachment as **Enclosure D**. See Topic 10 below for further details.

8. Self Assessment & Corrective Action

For this agenda topic, NEI turned the industry's presentation over to the Institute of Nuclear Plant Operations (INPO). INPO representatives presented the results of their activities to date in the topical area. The INPO presentation material is included as **Enclosure** E to this attachment. INPO briefly discussed their involvement, since 1997, in evaluating industry Self Assessment and Corrective Action. The presentation focused on the results of 23 station evaluations since July 2000 conducted by INPO. As noted in the presentation material, INPO identified both "Strong Points" and "Identified Weaknesses" during their evaluations.

9. Electronic Communications

NEI discussed the NRC's decision to accept electronic communications from Part 50 facilities, but not other licensees (e.g., Part 70). NEI expressed concerns about the slow progress in revising the rules to allow electronic communications in the materials area. NEI requested that the NRC expedite rule revisions to allow acceptance of electronic communications from all license holders.

The NRC responded that there was an electronic communications rule under development and the staff anticipated issuing for comment by summer of 2001. The NRC was working toward an actual implementation time in early 2002.

10. Action Items from September 26, 2000, Meeting

A brief discussion on the status of Action Items from the September 26, 2000, NRC/NEI senior management meeting was conducted. NEI initiated the dialogue with a request that they meet with the staff to discuss industry initiatives such as the materials reliability program. Additionally, NEI discussed and referred back to the list of "Reporting Requirement Burden Reduction," which included a list of proposed rule changes. The list of proposed rule changes

had originally been prepared by Commonwealth Edison, and NEI believed the list was representative of industry suggestions. As noted above for agenda topic Number 7, the distributed list is included in this attachment as **Enclosure D**.

The NRC requested that NEI survey the industry and prioritize the areas it concluded were candidates for NRC efforts to reduce unnecessary regulatory burden. The NRC further requested that **Enclosure D** be incorporated and prioritized in the NEI survey, as appropriate. Both NEI and the NRC agreed that the prioritized list of items needed to be available for the Unnecessary Regulatory Burden workshop to be conducted on May 31, 2001.

In addition, the NRC provided the status of past action items including the status of Okonite Bonded Jacket Cable, modular accident analysis program (MAAP) code, and the unavailability definition for performance indicators. Regarding the MAAP code action item, the NRC requested that industry provide two examples that could be used to test the code. The NRC acknowledged and committed to work on gaining consensus of the unavailability definition at the May 2001 workshop.

ACTION ITEM: NEI to provide NRC two examples for use with the electric power research institute's (EPRI's) MAAP code.

11. Fuel Cycle Oversight Process Revisions

NEI stated that industry continued to support this effort, and briefly discussed industry proposal on what constituted an effective corrective action program. Further, NEI stated their willingness to meet and discuss industry's proposed corrective action program for fuel cycle facilities.

The NRC agreed that existing corrective action programs used at reactor facilities included several attractive features that could be applied to the fuel cycle facilities. In addition, the NRC acknowledged NEI's continued support for the proposed revision to the fuel cycle oversight process.

Action Item: NRC and NEI will work on an acceptable corrective action program for the fuel cycle facilities. NEI committed to work with the NRC to schedule and support a workshop.

12. Security Updates

NEI opened the discussion on this topic by stating their concern about the quality of interactions and communications in the security area (e.g., security performance assessment (SPA) and fitness for duty rule). Specific examples provided by NEI included perceived frustration over lack of interaction with the NRC over the past year; belief that sufficient discussions regarding how NRC oversight fits into the overall industry effort have not been held; concern that the NRC had contracted work to develop guidance without NEI input; and concern that 120 day comment period may not meet stakeholder needs. Another area of concern to NEI under this agenda topic was the Fitness-for-Duty Rule and recent NRC discussions of program implementation changes that could be a major cost to industry. On a positive note, NEI stated that since September 2000, process improvements had been observed in operational safeguards response evaluations.

The NRC acknowledged the comments and perceptions presented by NEI, but did not agree with all the comments. There was agreement that communications between the industry and NRC could improve; however, it was noted by the NRC that it could not do business behind closed doors, i.e., all stakeholders must be included in deliberations. Regarding the perceived lack of good communications, the NRC asked to be provided with specific examples.

ACTION ITEM: NRC would assure an agenda item was included in the upcoming April 5, 2001, meeting.

13. NEI Recruitment Workshop Week of 3/26

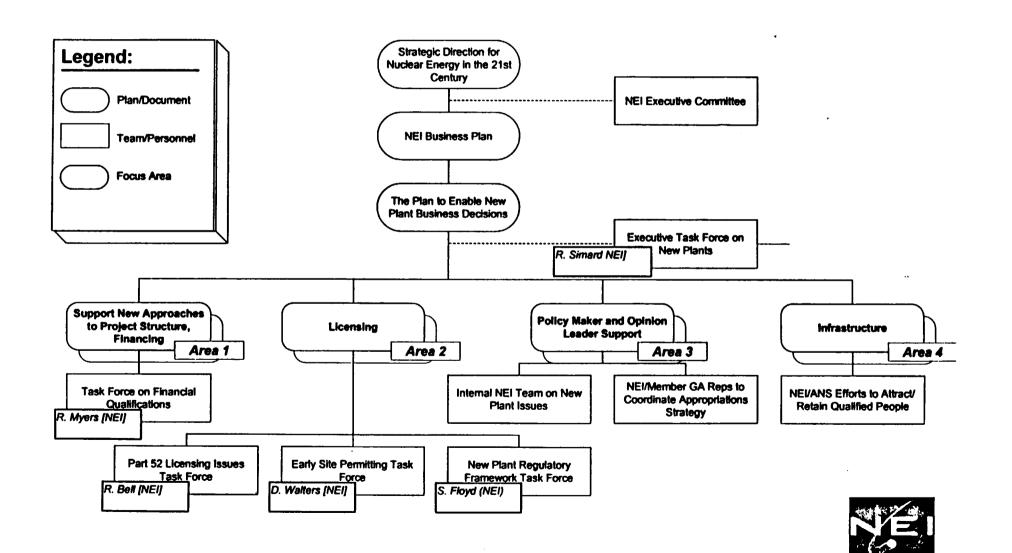
The NRC acknowledged the value of the NEI sponsored workshop. Further, the NRC stated their intent to participate in the workshop planned for the week of March 26, 2001.

NRC/NEI SENIOR MANAGEMENT MEETING LIST OF ATTENDEES March 20, 2001

NAME	ORGANIZATION	NAME	ORGANIZATION	
Bill Travers Carl Paperiello Sam Collins Bill Borchardt Bill Brach Steve Burns Scott Newberry Jon Johnson	NRC NRC NRC NRC NRC NRC NRC	William Kane Pat Norry Martin Virgilio Roy Zimmerman Brian Sheron Cindi Carpenter Frank Gillespie Patrick Hiland	NRC NRC NRC NRC NRC NRC NRC	
Ralph Beedle Alex Marion Dave Modeen Lynnette Hendricks Kurt Cozens Alan Nelson Paul Genoa	NEI NEI NEI NEI NEI NEI	Felix Killar, Jr. Steve Floyd Tony Pietrangelo Jim Davis Robert Bishop Melanie White Ron Simard	NEI NEI NEI NEI NEI NEI	
Gary Leidich Bill Webster Rick Jacobs	INPO INPO INPO			
Tim Sweeney Nancy Chapman Charlie Brinkman Jenny Weil Michael Kwapik Gary Vine Roger Hustan Deann Raleigh	SERCH Westinghous McGraw-Hill McGraw-Hill EPRI Licensing Su	Westinghouse McGraw-Hill McGraw-Hill		

ENCLOSURE A

Activities in Support of New Plant Deployment



Four Task Force Focus Areas

- Predictable licensing and stable regulation
- Options for ownership, risk sharing and project financing
- Policy maker support (Administration, Congress and others)
- Infrastructure, e.g., people, to support new and current plants



Predictable Licensing and Stable Regulation

- Part 52 Licensing Issues Task Force
 - Ensure confidence in licensing, construction inspection and start-up processes
- Early Site Permit Task Force
 - Initiate early site permit project
- Regulatory Framework Task Force
 - Establish generic design and operating criteria for new designs

Part 52 Licensing Issues Task Force

- Achieve Part 52 changes necessary to prepare for new license applications
- Clarify combined license (COL) process, e.g.,
 - Scope of COL ITAAC
 - Construction inspection and ITAAC verification
- Develop and secure NRC endorsement of Part 52 implementation guidance



Early Site Permit Task Force

- Resolve issues and develop generic tools for efficient ESP process
 - Regulatory infrastructure
 - Guidance for developing ESP applications
 - ESP project scope and schedule estimates
- Support ESP pilot project(s)
 - Sites with operating nuclear plants
 - Greenfield and other kinds of sites



Regulatory Framework Task Force

- Tops-down approach based on NRC mission and Safety Cornerstones
- Task Force objectives
 - Develop set of General Design Criteria and General Operating Criteria
 - Develop an improved set of generic, riskinformed, performance -based regulations
- Regulatory guides envisioned on how specific designs meet the regulations



Options for ownership, risk sharing and project financing

- Evaluate the business case for new plants and identify possible cost offsets through policy changes or legislation
- Apply experience from similar capital intensive, long-lead projects in other industries
- Seek necessary changes to NRC regulations, e.g., treatment of financial qualifications, decommissioning funding assurance, etc.

Policy Maker and Public Support

- Broaden support for new plants within the new Congress and Administration
- Remove barriers to commercial deployment of advanced designs
- Secure NRC resource commitment needed to support new plant licensing activities
- Broaden public support, including private sector policy groups and the financial community



Infrastructure Support

- Identify the needs for qualified people for design, construction, operation and regulatory oversight
- Assess the current efforts to meet those needs, identify gaps and lay out actions to fill the gaps
- Provide a mechanism for coordinating and integrating efforts among the diverse organizations addressing infrastructure issues



ENCLOSURE B

Risk-Informed Regulatory Initiatives

NRC/NEI Senior Management Meeting March 20, 2001



Option 2 - Special Treatment Requirements

- Need for definitive conclusion on treatment of safety-related, low safetysignificant SSCs by June to support Owners' Group pilots
- Upcoming Option 2 guideline meetings



Option 3 - Technical Requirements

- Significant interactions over past year
 - 5 public meetings, 2 workshops
- Industry disappointed with staff presentation to ACRS last week
 - Evident reluctance to address redefinition of LBLOCA as priority item
 - Near-term recommendations offer limited benefits for extensive work

Why redefine LBLOCA?

- Greatest potential to focus NRC and licensee resources and attention on safety-significant matters
- Builds on prior applications
- Maintain mitigation commensurate with safety significance

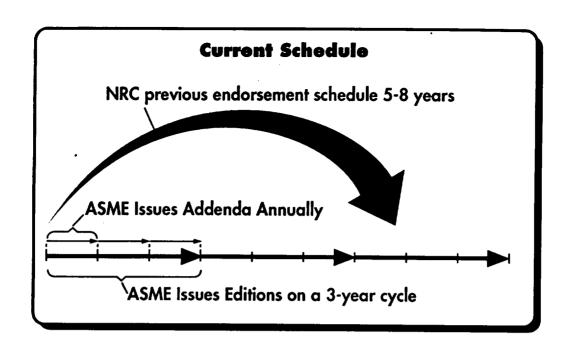


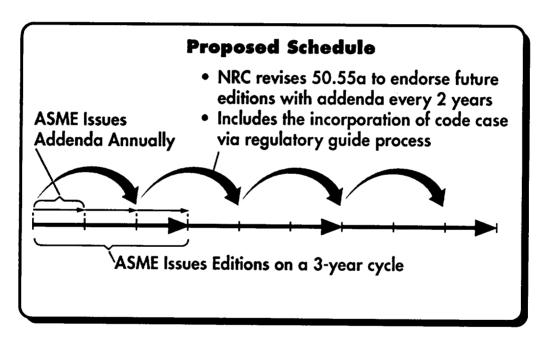
Potential Industry Actions

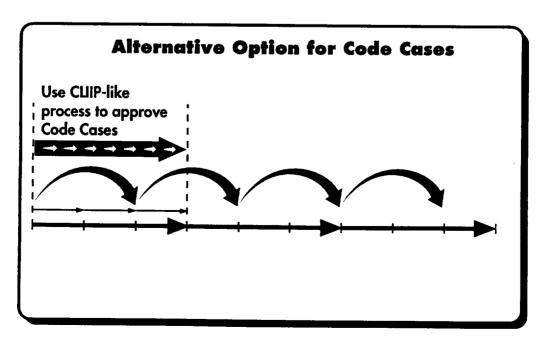
- Stop work on comprehensive riskinformed regulation changes
- Drop LBLOCA; engage staff on other 50.46 alternatives
- Petition for direct final rule on 50.46
 to enable redefinition of LBLOCA



ENCLOSURE C







ENCLOSURE D

Reporting Requirement Burden Reduction

A list of current reporting requirements to consider for revision or elimination is provided below. The list was prepared by the NEI Licensing Action Task Force and first discussed with the NRC staff at a public meeting on September 19, 2000. It is derived from (1) a list of reporting requirements maintained by TXU Electric for the Comanche Peak Steam Electric Station and (2) a list of proposed rule changes provided by Commonwealth Edison at a meeting with the NRC Office of Research on June 14, 2000.

1. 10 CFR 26.71, Recordkeeping requirements [26.71(d)]
Submit fitness-for-duty (FFD) program performance data every six months.

CHANGE: Eliminate the requirement to submit data.

JUSTIFICATION: FFD program performance data will be collected and compiled. It is available for on-site inspection.

2. 10 CFR 50.4, Written communications [50.4(b)(6), Updated FSAR] Submit signed original and 10 copies of updated final safety analysis report (FSAR) replacement pages to the Document Control Desk (Note: this includes other documents periodically updated that are referenced in UFSAR, e.g., fire protection report, etc.)

CHANGE: Eliminate the requirement for multiple copies.

JUSTIFICATION: ADAMS reduces the need for multiple paper copies. This issue is also addressed in RIS 2001-05, "Guidance on Submitting Documents to the NRC by Electronic Information Exchange or by CD-ROM."

3. 10 CFR 50.36a, Technical specifications on effluents from nuclear power plants [50.36a(a)(2)]

Submit an annual radioactive effluent report.

CHANGE: Eliminate the requirement to submit an annual report.

JUSTIFICATION: Appendix I to 10 CFR 50 (Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion "As Low as is Reasonably Achievable" for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents) contains data collection requirements. The data are available for on-site inspection.

4. 10 CFR 50.46, Acceptance criteria for emergency core cooling systems for light-water nuclear power reactors [50.46(a)(3)(ii)]

Submit an annual report of changes or errors in the ECCS evaluation model. If a change or error is significant, submit within 30 days.

CHANGE:

Eliminate the requirements for these reports.

JUSTIFICATION: This is the only calculated core parameter that is required to be reported to the NRC. It is monitored by the licensee and is available for on-site inspection. Report, when necessary, in accordance with 10 CFR 50.72 and 50.73.

5. 10 CFR 50.54, Conditions of licenses [50.54(p)(2), site security plans]; 10 CFR 72.44, License conditions [72.44(e), ISFSI security plans] Submit a report of each change to a security plan made without prior NRC approval. Submit within 2 months after the change is made.

CHANGE:

Eliminate the requirement to submit changes made without prior

NRC approval.

JUSTIFICATION: The reports are "informational." Security plans and procedures, including documentation of changes, are available for on-site inspection.

6. 10 CFR 50.54, Conditions of licenses [50.54(q), site emergency plans]; 10 CFR 72.44, License conditions [72.44(f), ISFSI emergency plans] Submit a report of each change to an emergency plan made without prior NRC approval. Under 50.54(q), submit within 30 days after the change is made. Under 72.44(f), submit within six months.

CHANGE:

Eliminate the requirement to submit changes made without prior NRC approval.

JUSTIFICATION: The reports are "informational." Emergency plans and procedures, including documentation of changes, are available for on-site inspection.

7. 10 CFR 50.54, Conditions of licenses [50.54(w)(3), insurance] Submit an annual insurance/financial-security report on April 1.

CHANGE:

Eliminate the requirement for this report.

JUSTIFICATION: Licensees must comply with 10 CFR 50.54(w)(1), which specifies the required amount and acceptable sources of insurance. Compliance can be verified by inspection.

8. 10 CFR 50.54, Conditions of licenses [50.54(bb), irradiated fuel management after cessation of reactor operationl

Submit written notification of the program a licensee plans to use to manage and provide funding to manage irradiated fuel following permanent cessation of reactor operation (before title to the fuel is transferred to DOE for disposal in a repository). Submit within 5 years before OL expiration, or within 2 years following permanent cessation. Notify NRC of significant changes to the program described in the initial notification.

CHANGE:

Eliminate the requirement for initial and subsequent

notifications.

JUSTIFICATION: In part, the information is redundant to that required by 10 CFR 50.82 in the post-shutdown decommissioning activities report and the site-specific decommissioning cost estimate. Also, if a licensee uses on-site dry cask storage, the NRC is notified in accordance with 10 CFR 72.

9. 10 CFR 50.59, Changes, tests, and experiments [50.59(d)(2)] 10 CFR 72.48, Changes, tests, and experiments [72.48(b)(2)]

Submit a summary report of changes, tests, and experiments. Operating reactor licensees submit at intervals not to exceed 24 months. ISFSI licensees submit at least annually.

CHANGE:

Eliminate the requirement to submit summary reports of

changes, tests, and experiments.

JUSTIFICATION: The reports are "informational." Licensee evaluations are available for on-site inspection.

10 CFR 50.71, Maintenance of records, making of reports [50.71(b)] 10. Submit an annual financial report, including certified financial statements.

CHANGE: Eliminate requirement to submit report.

JUSTIFICATION: The submittal is "informational." It is available for on-site inspection.

10 CFR 50.75, Reporting and recordkeeping for decommissioning 11. planning [50.75(f)(1)]

Submit reports on the status of decommissioning funding at least once every 2 years. CHANGE: After the initial submittal (March 31, 1999), update the report only if the funding approach changes, upon merger or acquisition, or approximately 5 years before decommissioning (as part of the decommissioning plan).

12. 10 CFR 72.44, License conditions [72.44(d)(3)]

Submit an annual report of radioactive effluents (licensees authorized to receive, handle, and store spent fuel or high-level radioactive waste).

CHANGE:

Eliminate the requirement to submit a report for dry cask storage

types that do not have effluents.

JUSTIFICATION: NRC safety evaluations for dry storage casks acknowledge designs that preclude effluents.

13. 10 CFR 140.15, Proof of financial protection [140.15(b)(1)]

File annual financial statements.

CHANGE:

Consider deleting this requirement.

JUSTIFICATION: Determine the regulatory need for this report. If it is not reviewed and used by NRC staff for an identified purpose, it should be eliminated.

14. 10 CFR 140.21, Licensee guarantees of payment of deferred premiums Submit evidence annually of guarantee of payment of deferred premiums.

CHANGE:

Eliminate this requirement.

JUSTIFICATION: The submittal "informational." It is redundant to 10 CFR 140.11 (Amounts of financial protection for certain reactors).

15. Standard Tech Spec 5.6.4, Monthly Operating Report

Monthly report of operating statistics and shutdown experience.

CHANGE:

Eliminate requirement from Technical Specifications.

JUSTIFICATION: Determine the regulatory need for this report. Elimination would reallocate approximately 600 man-hours per year per unit.

ENCLOSURE E

INPO Perspective on Industry Self Assessment and Corrective Action Programs

Rick Jacobs March 20, 2001

Background

- INPO has been evaluating SA/CA since 1997
- SA/CA Principles document issued 12/99
- Industry task force w/ utility executive oversight
- All utilities reviewed programs against principles
- INPO evaluations against principles began July 2000
- 23 stations evaluated since July

Evaluation Methodology

- Team manager leads evaluation, all areas contribute
- Gap analysis determines differences between principles and utility program
- Extensive document review at INPO
- Selected condition reports and corrective actions followed up onsite
- Program owners, users and managers interviewed
- Areas for improvement written if principles not met

Documents Reviewed Each Evaluation

- Recent self assessment reports in each functional and cross functional area
- Independent audits/effectiveness reviews of CA program
- Recent root cause reports
- SA/CA program policies and procedures
- Several hundred condition reports written since last evaluation

Strong Points

- SA/CA programs have strong management support
- Industry on improving trend in SA/CA 15 strengths written since July
- Low thresholds for problem identification
- Programs for identifying, screening, reportability, and management review generally solid
- Quality/quantity of self assessments improving

Identified Weaknesses

Problem Resolution Shallow (9 stations)

- Root causes don't investigate organization effectiveness issues or human performance contributors
- Extent of condition evaluation not thorough
- Root causes not timely

Ineffective Corrective Actions – Repeat Events (6 stations)

- Lack of rigor in tracking/closeout numerous delays/extensions
- Quality/timeliness not monitored
- Identified corrective actions miss the mark

Identified Weaknesses (con't)

Self assessments performed by departments not meeting program objectives (9 stations)

- Department level assessments done because required
- Quality varies among departments
- Assessments don't result in improvement actions
- Performance compared to requirements not top performance

Management observation programs not effective (4 stations)

- Observations not critical few improvement opportunities identified
- Managers and supervisors not trained/coached
- Reluctance to identify improper behaviors

Identified Weaknesses (con't)

Adverse trends not identified or used (4 stations)

- Trends identified but not acted upon
- Trending not helpful categories too broad, causes not available to target resolution
- Lower tiered programs not monitored for trends

Key Self-Assessment Principles

- Formal program; includes ongoing and periodic focused self-assessments
- People with necessary expertise
- Performance measured against high standards, management expectations, and requirements
- Station organizations routinely self-assess
- Independent oversight groups periodically used
- Close communication with assessed groups and sharing of results
- Issues promptly captured for resolution
- Program effectiveness is reviewed

Key Corrective Action Principles

- All employees encouraged to report problems
- Reporting criteria, system(s), level(s) of problem evaluation, and corrective action timeliness defined
- Prompt screening for safety, reliability, operability, and reportability
- Evaluation commensurate with problem significance
- Root cause analysis of significant problems, not needed for lower-significance problems

Key Corrective Action Principles (cont)

- Corrective actions approved, prioritized, and completed in a timely manner
- Prompt feedback to employees
- Trending to identify repeat occurrences, generic issues, and vulnerabilities
- Lower-tier information assessed for trends
- Corrective action effectiveness checks
- Overall program effectiveness checks

NRC/NEI SENIOR MANAGEMENT MEETING LIST OF ATTENDEES March 20, 2001

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NAME PHiland P2 H MSatorius SBurns CPaperiello PNorry	OFFICE	ROPMS	E	ROPMS:C	OGC O	DEDMRS	DEDM
DATE 3/19/01 34/01 4/101 NOVELLET 3/ /01 3/ /01	NAME	PHiland	PZH		SBurns (1)	CPaperiello	PNorry
	DATE	3/19/01		3/2 9 01	14201 No 1 Ject	3/ /01	3/ /01

OFFICE	DEDR	EDO		
NAME	WKane	WTravers		
DATE	3/ /01	3/ /01		