

October 2, 2001

MEMORANDUM TO: Stuart A. Richards, Director  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

FROM: Jack Cushing, Project Manager, Section 2 /RA/  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MEETING HELD ON JULY 19, 2001, WITH THE  
COMBUSTION ENGINEERING OWNERS GROUP (CEOG)  
REGARDING IMPROVEMENTS TO THE TOPICAL REPORT PROCESS

On July 19, 2001, a public meeting was held at the NRC Headquarters office in Rockville, Maryland, between the CEOG and the NRC staff. The list of attendees is attached. The purpose of the meeting was to discuss lessons learned from the review of CEOG topical reports and improvements to the topical report process. The slides are available in ADAMS under accession number ML012010400.

The improvements that are envisioned are:

- improved quality of both topical reports and safety evaluations (SE),
- ensure topical reports provide the necessary information so that the NRC can perform an efficient review, and
- timely and cost-effective implementation.

The CEOG discussed their self-assessment plan. The plan involves performing a case study of two previously reviewed topical reports, Safety Injection Tank/Low Pressure Safety Injection/Emergency Diesel Generator Allowed Outage Time (AOT) Extension and Elimination of Post Accident Sampling System (PASS). The two topical reports cover a spectrum of issues. By analyzing the review of these two topical reports, the CEOG plans to develop a lessons learned report that will provide input to the topical report improvement process. Inherent in the improvement process is establishing metrics to provide ongoing performance assessment and to identify further improvements.

The NRC staff has a similar effort to improve the topical report process. An office instruction was recently issued to provide staff guidance on the review process for topical reports.

The NRC staff and the CEOG had similar findings on areas for improvements.

1. Pre-application meeting should discuss:
  - Concept and technical issues.
  - Scope of the topical report (how much of the subsequent license amendment will be covered in the topical report and how much will be provided on a plant specific basis).
  - Schedule for submittal of topical report and requested completion date for SE.
  - Process (if the topical report involves a change to standard technical specifications then a technical specification task force traveler (TSTF) is needed. Will the consolidated line item process (CLIP) be used or individual license amendments)?
  - Will a fee waiver be requested (must meet criteria of 10 CFR 170.21)?
  - Staff should if possible provide a rough estimate of review hours.
  - Process issues, if the submittal is a new process, (i.e., first of its kind risk-informed report then the review path should be clearly understood by both parties. Does regulatory guidance need to be developed? Does the report qualify for a fee waiver)?
  
2. The cover letter submitting the report should state:
  - What is requested (i.e., approval for referencing in licensing actions for CE designed plants).
  - When the review should be completed and why.
  - Which licensees will be sending in a license amendment.
  - What method will the licensee use for their amendment request (CLIP or individual submittal).
  - When will the technical specification task force traveler (TSTF) be submitted.
  - If the CEOG believes the report qualifies for a fee waiver in accordance with the criterion in 10 CFR 170.21, then request one at the time of submittal. Review will not start until fee waiver is resolved.
  
3. The NRC should issue a letter accepting or rejecting the report for review within 30 days. The letter should state:
  - Estimated staff review hours.
  - Target date for completing review.
  - Whether fees are being billed to the applicant.
  - Any extenuating circumstances that may interfere with the review.
  
4. The licensees that will be referencing the topical report should commit to a sufficient level of participation during the review process to allow for a timely closure of technical issues.
  
5. The topical report should be limited to addressing systems that have sufficient commonality of design and operation to allow a meaningful comparison of risk.

6. The topical report should provide probabilistic risk assessment (PRA) assumptions impacting the applications in a standard way. Categories of assumptions are:
  - Success Criteria.
  - Recoveries.
  - Credit taken for other systems.
  - Configuration assumptions.
7. Frequent communication during the review process, either by phone calls or meetings would help resolve issues.
8. Licensees should submit a license amendment as soon as possible after the topical report is approved.

The above analysis and the lessons learned will be incorporated into a revision of the office instruction for the review of topical reports. This will improve our review process. However, topical reports are merely one component of a license amendment. An efficient and technically thorough review of a topical report that does not result in a license amendment is a waste of both the licensees and the NRC resources.

The meeting ended with the CEOG stating that they are continuing to develop the metrics for their self assessment. The staff requested that the CEOG share the non-sensitive information they develop that can help the staff improve its review process. The staff also requested that the topical reports that are under development capture as much of the lessons learned as possible.

The staff and the CEOG realize that improvement is an on-going process and will both continue to work together to make the process as efficient as possible.

Project No. 692

Attachment: Meeting Attendees

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NAME	JCushing:lf	EPeyton	SDembek
DATE	10/1/01	9/27/01	10/1/01

CE Owners Group

Project No. 692

cc:

Mr. Richard Bernier, Chairman  
CE Owners Group  
Mail Stop 7868  
Arizona Public Service Company  
Palo Verde Nuclear Generating Station  
P.O. Box 52034  
Phoenix, Arizona 85072-2034

Mr. Gordon C. Bischoff, Program Manager  
CE Owners Group  
Westinghouse Electric Company LLC  
Mail Stop 125020 - 0407  
2000 Day Hill Road  
Windsor, CT 06095-0500

Mr. Andrew P. Drake, Project Manager  
Westinghouse Owners Group  
Westinghouse Electric Company LLC  
Mail Stop ECE 5-16  
P.O. Box 355  
Pittsburgh, PA 15230-0355

Mr. Charles B. Brinkman, Director  
Washington Operations  
Westinghouse Electric Company LLC  
12300 Twinbrook Parkway, Suite 330  
Rockville, MD 20852

Mr. Virgil A. Paggen  
Westinghouse Electric Company LLC  
Mail Stop 126009 - 1901  
2000 Day Hill Road  
Windsor, CT 06095-0500

**ATTENDANCE LIST FOR MEETING BETWEEN  
NRC AND THE CEOG  
REGARDING IMPROVEMENTS TO THE TOPICAL REPORT PROCESS  
JULY 19, 2001**

**CEOG**

Ed Weinkam  
Vigil Paggen  
Dave Smith  
Miles Brandon  
Jack Rainsberry  
Rich Jaworski  
Mike Schoppman  
Philip Richardson

**NRC**

Jack Cushing  
Mark Rubin  
Stephen Dembek  
Millard Wohl  
Robert Dennig