



NUCLEAR ENERGY INSTITUTE

Ralph E. Beedle

SENIOR VICE PRESIDENT AND
CHIEF NUCLEAR OFFICER,
NUCLEAR GENERATION

October 1, 2001

Mr. Samuel J. Collins
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop O-5 E7
Washington, DC 20555-0001

Dear Mr. Collins:

On October 31, 2000, NRC published a *Federal Register* notice authorizing the first use of the consolidated line item improvement process (CLIIP) for plants with a Westinghouse or Combustion Engineering design. The notice, "Notice of Availability for Referencing in License Amendment Applications – Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems Using the Consolidated Line Item Improvement Process" (65 FR 65018), established a one-year period during which licensees may reference the model SE and NSHC determination. The period expires on October 31, 2001. Given the unanimous use of the pilot CLIIP, NEI recommends that NRC extend the due date by six months to permit all plants to reference the CLIIP.

NEI recently conducted a telephone survey of all plant sites with Westinghouse and Combustion Engineering designs to determine which had submitted, or were planning to submit, license amendment requests (LARs) to reference the model SE and NSHC determination for PASS elimination. The "lessons learned" from the survey are attached for your information. Of particular interest is the fact that approximately half the applicable plants have submitted LARs and the remaining plants intend to submit. However, for reasons based on reallocation of resources, a few licensees may not be able to submit before the October 31, 2001, due date.

We believe this action results in a prudent use of NRC resources. The objective of placing a due date on use of the CLIIP is to encourage licensees to submit applications in a time frame during which the set of NRC staff reviewers familiar with the issue and available to process the applications would remain relatively

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stable. Extending the due date for a brief time period will continue to satisfy this objective.

Please call me or Lynnette Hendricks (202-739-8109) if you have questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Beedle", written over a horizontal line.

Ralph E. Beedle

Enclosure

Post Accident Sampling System Survey Summary

- *Pilot CLIIP* – On October 31, 2000, the NRC published a *Federal Register* notice of availability (65 FR 65018) for the first use of the consolidated line item improvement program (CLIIP). The FR notice contained a model safety evaluation for a Technical Specification (TS) improvement to eliminate requirements on the post-accident sampling system (PASS) at Westinghouse and CE plants. A one-year time period was allotted for referencing the model SE.
- *Applicability of Pilot CLIIP* – There are 28 Westinghouse and nine CE plant sites (60 units).¹ The PASS CLIIP is applicable to 35 of these sites (57 units). Based on an NEI telephone survey concluded on September 7, 2001, license amendment requests (LARs) have been submitted by 18 sites (30 units). The remaining 17 sites (27 units) are working to submit LARs before the due date of October 31, 2001.
- *Successful Pilot* – All Westinghouse sites, and all but two CE sites, either have submitted or intend to submit LARs to implement the PASS CLIIP. One CE site (two units) does not need to implement because the TS do not contain PASS requirements, and a second CE site (one unit) obtained a plant-specific amendment authorizing PASS elimination before the CLIIP was published. Therefore, 100% of the applicable plants intend to adopt the PASS CLIIP.
- *Implementation Time for a Complex CLIIP* – Nuclear sites typically plan and budget on a one-year cycle. The budget for a given 12-month period is established well in advance of that period. If a complex CLIIP (such as PASS elimination) is published after a licensee's planning cycle has ended, its implementation may be delayed until the next planning cycle. Thus, a complex CLIIP needs at least a two-year implementation window.
- *Extend the Implementation Time for the Pilot CLIIP* – A few licensees that intend to implement the CLIIP for PASS elimination may not be able to submit before the October 31, 2001, due date. Emergent considerations have caused these licensees to reallocate engineering and/or licensing resources away from the CLIIP LAR. Given the success of the PASS CLIIP, NRC should extend the due date by six months rather than require a stand-alone LAR after October 31, 2001.

¹ For the purposes of the survey, Millstone-2 (CE) and Millstone-3 (W) were considered separate sites.