



*Strategic Planning and Resource Sharing*

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# STARS / IRAG

March 5, 2002

Meeting between STARS IRAG and NRC



# STARS

- Strategic Teaming and Resource Sharing
- Alliance started February 2000
- Original members: AmerenUE, TXU Electric, Pacific Gas and Electric, STPNOC and Wolf Creek NOC
- Additional members: Arizona Public Service Co. joined in January 2002



# IRAG

- Integrated Regulatory Affairs Group
- Team of Regulatory Affairs managers for each of the STARS members
- Worked together even before STARS organized
- Focused on more effectively and efficiently addressing regulatory issues



# IRAG Activities

- STARS Projects
- Centers of Excellence (COEs)
- IRAG Projects
- Enhanced communications
- Strategic Regulatory Issues



# IRAG - STARS Projects

- Control Room Habitability
- 50.59 Rule Implementation
- Common training on revised reporting requirements
- Common licensing processes
- Enhanced communications with industry



## IRAG - COEs

- 10CFR50.59 Program
- Event reporting/operability evaluations
- License renewal
- Licensing Actions
- Risk informed initiatives
- Regulatory Oversight Process
- Regulatory Affairs Training



# IRAG Projects

- Center of Business - Regulatory Affairs Strategic Issues Group (RASIG)
- IRAG organizational study
- Offsite Safety Committees
- Electronic Licensing Basis Documents (LBDs)
- Updated Technical Requirements Manuals (TRMs)



## IRAG Enhanced Communications

- Weekly conference calls to address active licensing issues (rulemaking, etc.)
- Coordinated interface with industry organizations (NEI, WOG, EPRI, etc.)
- Quarterly meeting
- Joint meetings/interfaces with NRC
- Monthly Licensing Reports





# IRAG Strategic Issues

- Reactor Vessel Head Cracking
- Security
- Worker Fatigue
- Risk Informed Regulatory Activity
- PWR Sumps



# Common Licensing Actions

- Past Common Submittals
  - Bases Control Program(50.59 Rule) - TSTF-364
  - Risk Informed Inservice Inspection (ISI)
  - Elimination of PASS Requirements - TSTF-366



# Common Licensing Actions

- Common LARs under review
  - Equipment Hatch Open during Fuel Movement
  - Missed Surveillances - TSTF-358
  - Definition of Positive Reactivity - TSTF-287
  - Low Power Calorimetric - TSTF-371
  - Expanded COLR and COLR References - TSTFs -339 & 363
  - Licensed Operator Qualifications - RIS 2001-01



## Future LARs

- RIS 2001-21 responses by all members
- Potential Common Submittals
  - Mode restraints (potential CLIIP) - TSTF-359
  - Inoperable Snubbers - TSTF-372
  - NIS trips during physics testing - TSTF-315
  - Electrical Surveillance mode restrictions - TSTF-283
  - AC Electrical Completion Times - TSTF-417
  - DC Electrical Rewrite - TSTF-360



## Other Future LARs

- Eliminate Response Time testing for certain SSPS components
- Increase surveillance interval for slave relays
- Increased surveillance interval for certain RPS components
- Relaxed Completion Times for Containment Isolation Valves
- Update License Conditions (e.g. reporting)



## STARS Saving on Common LARs re NRC Review Costs

<u>Common LAR</u>	<u>TXU</u>	<u>WC</u>	<u>CA</u>	<u>DC</u>	<u>STP</u>	<u>PV</u>	<u>STARS</u>	<u>Lead</u>
<b>PASS</b>								
NRC Cost		\$734.40	\$993.60	\$1152.00	\$450.00	\$1540.00	\$734.40	WCNOC
Saving Est.		0	(259.20)	(417.60)	284.40	NA	(\$392.40)	2001 savings
<b>RI-ISI</b>								
NRC Cost	\$34290.00	\$16985.40	\$9083.40	\$9374.40	\$1583.60		\$34,290.00	TXU
Saving Est.	0	\$17,304.60	\$25,206.60	\$24,915.60	\$32,706.40		\$100,133.20	2001 Savings 2002 Savings
<b>Equipment Hatch</b>								
NRC Cost		2078.40					2078.40	WCNOC
Saving Est.		0					0	
<b>50.59 Rule</b>								
NRC Cost	\$3,744.00	\$691.20	\$1,512.00	\$1,440.00	NA	\$2300.00	3744.00	TXU
Saving Est.	0	\$3,052.80	\$2,232.00	\$2,304.00	NA	NA	\$7,588.80	2001 Savings
<b>Expanded COLR</b>								WCNOC
NRC Cost								
Saving Est.								
<b>Missed SRs</b>								AmerenUE
NRC Cost								
Saving Est.								
<b>LP Cal</b>								AmerenUE
NRC Cost								
Saving Est.								
<b>Pos Reactivity</b>								AmerenUE
NRC Cost								
Saving Est.								

(Updated quarterly from NRR invoices)



## Lessons Learned/ Open Discussion

- LAR Format
  - Use of NEI standard
- Parallel versus Staggered Submittals
- Degree of commonality
- Description of commonality
- Lead NRC Project Manager
- Same reviewer(s)



# Areas for Improvement

- Open Discussion
  - STARS
  - NRC