

Protocol for Resolution of Steam Generator Issues Between the Industry and the NRC

1.0 Purpose

The purpose of this protocol is to define a process for identifying, tracking, and resolving issues that may arise during NRC or industry review of guideline documents, plant-specific events, generic trends, and NRC research findings.

2.0 Scope

This process applies to all identified steam generator related issues, whether technical or regulatory. Both industry and NRC actions will be tracked.

3.0 Interface

The two principal parties involved in this process will be the NEI Steam Generator Program Task Force (SGTF) for the industry and the NDE and Metallurgy Section for the NRC. Other organizations will be called to support the effort as necessary.

Each principal party has identified a lead individual (“Lead”) and a point of contact (“Contact”) for communications as follows:

	Industry	NRC
Lead	Jim Riley	Louise Lund
Point of Contact	Jim Riley	Louise Lund

The Lead for each party will have overall responsibility for coordinating the resolution of the issues. The Point of Contact will be the focal point for written documents intended to either offer positions on the issues or provide comments on a position.

4.0 Process

4.1 Issue identification

This process is intended to capture all steam generator related issues that require resolution because of different NRC and industry positions. The industry and NRC Contacts will be responsible for obtaining a written summary of their party’s position on each issue. Each issue and the status of industry and NRC positions will be tracked. Management of the tracking system will meet the intent of the following guidance.

Protocol for Resolution of Steam Generator Issues Between the Industry and the NRC

4.2 Issue tracking

4.2.1 Issue management

4.2.1.1 Authority for Identifying Issues and Actions

The NRC and the industry Leads will jointly decide which issues to add to the Tracking List and will coordinate their resolution.

4.2.1.2 Prioritization of Issues

Each issue will be assigned a priority based on its safety significance and schedule importance.

Priority will be assigned as follows:

- 1 – high safety significance – needs immediate attention
- 2 – moderate safety significance – target resolution within 12 months
- 3 – low safety significance – resolve as time permits

4.2.1.3 Action Status

The next for each item will be identified: Each item's action status will be annotated as follows:

- I – Industry has the next action
- N – NRC has the next action
- P – “Pending” – Issue has been resolved but is awaiting publication of a document for final closeout.
- C – “Closed”

4.2.1.4 Assigning Action responsibilities

The Leads are responsible for ensuring that each item in the Tracking List has been assigned to a group for resolution.

4.2.1.5 Due dates

The Leads are responsible for the identification of any required due dates that may exist for items and ensuring that this information is entered in the Tracking List.

Protocol for Resolution of Steam Generator Issues Between the Industry and the NRC

4.2.2 Tracking List

4.2.2.1 Description

A Tracking List will be developed to aid the tracking of identified issues. The List will include:

- A statement of each issue being resolved
- A summary of each party's position on the issue
- The priority of each issue
- The next action identified for each issue
- Responsibilities for action completion
- Action due dates and status
- Applicable references for each item

The List will be used as the primary tool to structure industry / NRC meetings and follow the resolution of all open issues.

4.2.2.2 Responsibility for upkeep

NEI will be responsible for upkeep of the Tracking List. The Contacts will be responsible for informing NEI of changes to the information contained within the List.

4.2.2.3 Authority to change entries

The Leads will be responsible for agreeing to changes to the items in the List.

4.3 **Issue resolution**

4.3.1 Means of communication

Verbal communication is encouraged to facilitate progress on each issue. However, at some point written positions will be required to ensure understanding of the positions.

Written draft industry or NRC positions will be created for each issue and for actions as appropriate. The draft positions will be communicated via e-mail through the Contacts to the other party for review. Written comments on positions will be communicated via e-mail through the Contacts back to the group responsible for the work.

4.3.2 Meetings and phone calls

NRC and industry intend to meet frequently to resolve the steam generator issues. In so far as possible, written positions

Protocol for Resolution of Steam Generator Issues Between the Industry and the NRC

and comments will be brought to these meetings to facilitate understanding of each party's position.

4.4 Issue closeout

4.4.1 Issue Closure

For the purpose of this process, an issue will be considered closed when the NRC and the industry agree on the resolution or agree to disagree on the solution. If further action is required to complete the resolution, the item will be identified as "pending" and will be maintained on the list until its ultimate completion. For example:

Industry and NRC agree on the changes necessary to a Guideline. The Guideline must be changed before all the actions are final, but once industry and the NRC have reached agreement on the proposed change, further discussion on the issue will not be necessary. The item's status will be identified as pending until the Guideline is revised.

4.4.2 Documentation requirements

Once the industry has reached a final position on each issue, NEI will communicate the final industry response to the NRC by formal correspondence.

The NRC will formally respond to each final position in writing, either acknowledging agreement or documenting its final comments on the industry position and providing an alternate approach.

Final positions and a reference to the closeout document will be captured in the Tracking List.

5.0 Documentation

The final Tracking List will document all issues and the actions taken to resolve them.

Ultimately the closeout of every issue will be documented by a formal industry position submitted via NEI letter to the NRC and by a formal written NRC response that either expresses agreement with the industry position or provides NRC comments and an alternate position.

Email from Jim Riley 1/8/03 to L. Lund