

NRC/NEI Licensing Action Task Force Meeting

January 21, 2004

AGENDA

1. Annual Licensing Forum Followup items
2. Status of White Papers
  - alternate source term
  - setpoint methodology
3. Status of the Reduction of Unnecessary Burden Initiative
4. NOEDs and shutdown risk
5. NEI LATF Mission Statement 2004

NEI White Papers Submitted to NRC

Title	Version	Date
Use of Precedent in NRC Licensing Action	Draft	11/01/99
Unintended Technical Specification Actions	Original	03/15/00
Standard Format for Requests Pursuant to 10 CFR 50.55a	Original	10/15/02
Standard Format for Operating License Amendment Requests from Commercial Reactor Licensees	Revision 1	10/22/02
Use of the Generic Letter 91-18 Process and Alternative Source Terms in the Context of Control Room Habitability	Draft	10/22/03
ISA S67.04 Methods for Determining Trip Setpoints and Allowable Values for Safety-Related Instrumentation	Original	12/05/04

Future papers pending:

- Licensing aspects of setpoint methods and allowable values
- License amendment threshold

NEI LATF RUBI Pilots:

- Shift Technical Advisor – 12/9/03 letter from D. Stenger to NRC Chairman on behalf of the Nuclear Regulatory Services Group (NRSG) – request that the Nuclear Regulatory Commission consider an amendment to the 1985 *Commission Policy Statement on Engineering Expertise on Shift*.
- Monthly Operating Report – 1/5/04 submittal of TSTF Traveler 369 Revision 1
- Offsite Review Committee – 10/31/03 NMC fleet-wide submittal.

NOEDs and shutdown risk

- NEI has requested that EPRI prepare a paper describing the qualitative risk impacts of mode transitions
- 2/16/04 target date for draft paper to NEI

## **NEI Licensing Action Task Force (LATF) 2004 Mission Statement**

The mission of the NEI Licensing Action Task Force (LATF) is to identify potential licensing and regulatory issues and to provide licensing input to the resolution of regulatory and technical issues.

The LATF is comprised of the "licensing managers" on the NEI Licensing Contacts List. It includes the following U.S. organizations with a commercial power reactor program:

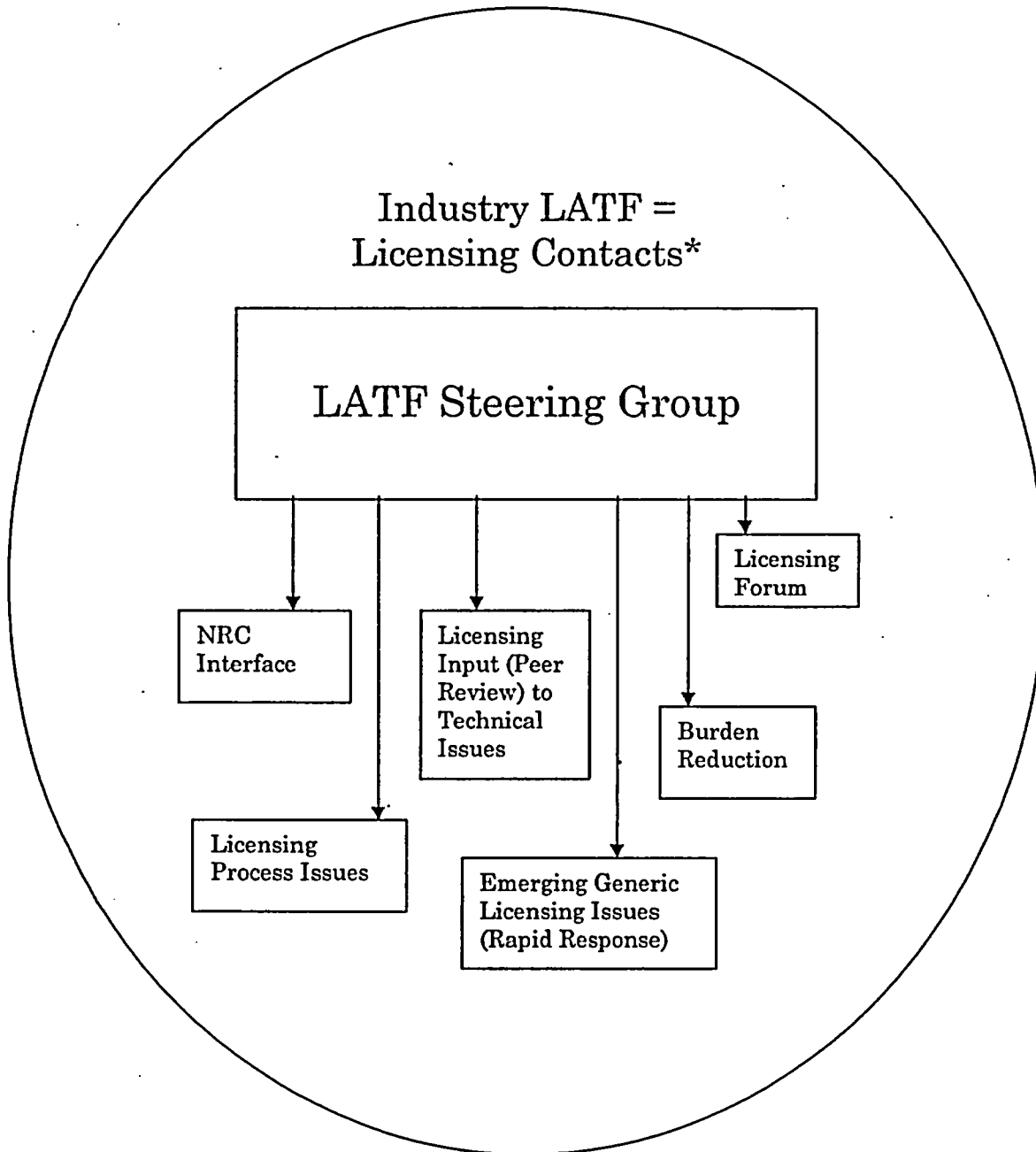
- Commercial utilities with operating nuclear power plants
- NSSS Owners Groups
- NSSS Vendors
- EPRI
- INPO
- Regional Utility Groups
- Special Issue Groups
- Nuclear-practice law firms (case-by-case)
- Licensing consultants (case-by-case)

The full LATF meets once per year at the annual Licensing Forum. A smaller LATF Steering Group meets approximately four times per year with NRC senior management.

Key areas of dialogue are:

- The procedures and processes used by licensees and NSSS vendors to prepare and submit proposed licensing actions.
- The procedures and processes used by the NRC staff to review proposed licensing actions and prepare safety evaluations (SEs).
- Identification of barriers to improved efficiency that are embedded in current processes (both Industry and NRC).
- New ideas for improving/expediting the processing and issuance of licensing actions.
- Feedback on the use of precedent, the threshold for prior NRC staff review and approval of licensee activities, NRC requests for additional information (RAIs), NRC task interface agreements (TIAs), and other regulatory processes.
- Communications between licensees and the NRC staff on generic licensing-process issues and licensing experience.
- The quality of industry submittals and NRC staff evaluations.
- Coordinating the sharing of licensing lessons learned, good practice, performance indicators, and other information across the nuclear industry through the annual Licensing Forum.

# NEI Licensing Action Task Force Functional Organization



\* Commercial reactor licensees; NSSS Owners Groups; NSSS vendors; EPRI; INPO; Regional Utility Groups; Special Issue Groups; nuclear-practice law firms (case-by-case); licensing consultants (case-by-case)

## LATF Organization

- Senior level licensing managers
  - Strategic oversight
  - Routine Communications conducted via Steering Group
    - Meetings at NEI (approximately quarterly)
    - Steering Group e-mail & telecons
    - Use "Licensing Contacts List" when warranted
    - Maintain a Licensing WebBoard
  - Publications
    - Guidelines
    - White Papers
    - Correspondence
- 

## NRC Interface

- Routine meetings at NRC (approximately quarterly). NRR Division of Licensing Project Management (DLPM) has lead for NRC.
  - Strategic Discussions
    - Emerging licensing issues
    - Licensing input to technical issues
    - Policy Discussions
    - Priorities
  - Establish a NRC/NEI LATF regulatory communications strategy
- 

## Licensing Process Issues

- Ensure development, review, & monitoring of regulatory strategy
  - adequate licensing input from industry
  - right level of licensing participation
- Standardization of submittals, for example:
  - LAR Format & Content
  - 10 CFR 50/55a requests
- Process Monitoring, for example:
  - RAI process
  - Regulatory creep (NRC Headquarters & Regions)
  - Use of precedent
  - NRC review cycle timing & review fees
  - Generic Letter 91-18 process
  - Consolidated Line Item Improvement Process (CLIIP)
  - Petitions for Rulemaking
  - Regulatory approval of ASME Code Cases

### Licensing Input to Technical Issues

- Ensure development, review, & monitoring of regulatory strategy
    - adequate licensing input
    - right level of licensing participation
    - Examples: PWR sump performance; Control Room Habitability; instrumentation setpoint methodologies
- 

### Emerging Generic Licensing Issues

- Rapid-response clearinghouse for new generic licensing issues
  - Determine scope & impact on industry resources, and make recommendation for action, if the issue exceeds a generic, high-level threshold
  - Coordinate with other industry groups and NRC
    - Owners Groups
    - Regional Utility Groups
    - Special Issue Groups
  - Transition to applicable LATF sub-group or industry group
  - National Regional Utility Group (NRUG) interface
- 

### Burden Reduction

- Ensure development, review, & monitoring of regulatory strategy
    - adequate licensing input
    - right level of licensing participation
  - NRC RUBI items (CFR based) + additional LATF items (may or may not be CFR based)
  - Maintain an up-to-date TABLE of RUBI items
  - Incorporate new industry initiatives, as needed
- 

### Licensing Forum

- Annual (Washington, DC area)
- Share licensing information, for example:
  - 50.59
  - design basis
  - UFSAR
  - commitment management
  - process improvement
  - best practices
- Licensing Managers determine agenda