

Decrease in Effectiveness 10 CFR 50.54(q) Guidance

NEI/STARS

50.54(q) Issue Task Force

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Background

- Mid 2003
 - NRC indicates need to address effective 50.54(q) evaluations
- July 2003
 - 68 Fed. Reg. 43673, July 24, 2003
- October 2003
 - NEI 50.54(q) Task Force formed to address industry issues and previous correspondence (EPPOS 4, RIS 2003-018, NRC Inspection Manual MC 0609, industry white paper and responses)



Background (continued)

- April 2004
 - NEI Task Force finalizes draft guidance and issues for industry review
- June 2004
 - NEI Task Force meeting to finalize and present to NRC



Collaborative Industry Effort

- Synergies
 - Reviewed new 50.54(q) guidance against NEI 96-07 Endorsed by NRC (10 CFR 50.59 process)
 - 50.54(q) guidance consistent with 50.54(p) (security)
- Industry involvement
 - NEI, STARS, and over 20 licensees input
 - 10 CFR 50.59 task force members on 50.54(q) task force



Why 50.54(q) Guidance Needed?

- History of ambiguous interpretations
- Inconsistent application of 50.54(q)
- Model guidance more closely to 50.59 process and language
- NRC inspections conclude some inconsistent evaluations performed



What Does NEI/STARS 50.54(q) Guidance Provide?

- Background
- Clear and unambiguous definitions
- 10 CFR 50.54(q) evaluation guidelines
- “Screening criteria” for proposed *activity*
- Guidance on seeking prior Commission approval



What Does NEI/STARS 50.54(q) Guidance Provide?

- Address relocation of Emergency Plan information to lower tier documents (“TS & TRM” similar to “E-Plan & EPIPs”)
- Extensive references
- NRC prior approval process (flow chart)
- Checklists to input evaluation results

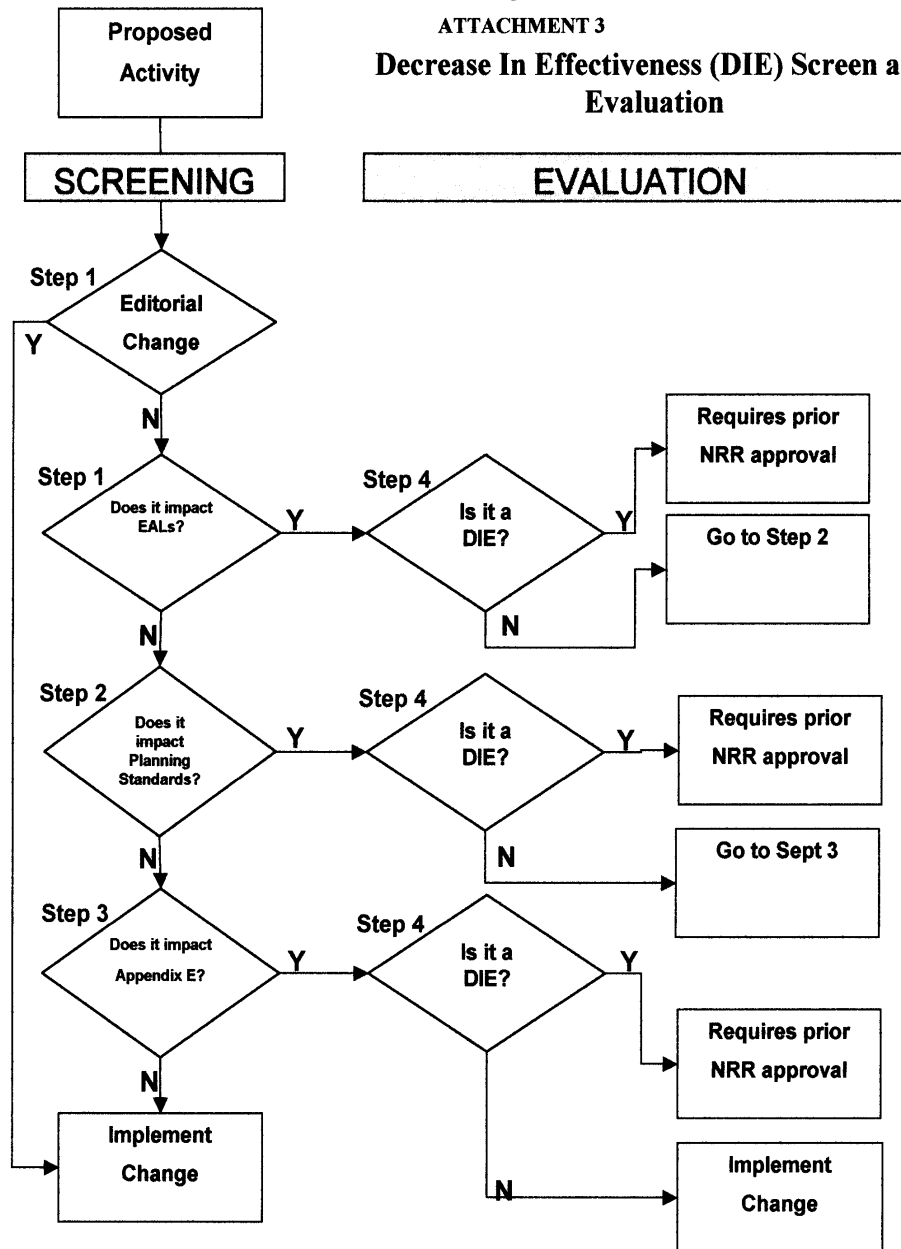


Checklists and Tables

- EALs impacted?
- Planning standards impacted?
 - Risk significant?
- Appendix E impacted?
- Decrease in effectiveness?
- NRC approval required to implement change?



Decrease In Effectiveness (DIE) Screen and Evaluation



Conclusion

- Questions?
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- Copies of draft NEI guidance available

