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Date: 04/04/2005 4:29PM
Subject: PROGRAM IMPLEMENTATION MATRIX.doc

The attached DRAFT pgm implementation matrix is provided as a basis for discussion at our public meeting on Apr. 7.

If you have any questions, please advise.

Thanks.

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DRAFT PROGRAM IMPLEMENTATION MATRIX

April 4, 2005

The Commission issued SRM/SECY-04-0032 on May 14, 2004. The SRM provided clarification to previously issued Commission guidance (SRM/SECY-02-0067) on the level of program description detail that must be provided in a COL application in lieu of programmatic ITAAC. The SRM listed 14 programs that are required by regulation and sorted the 14 programs into Categories A through E to aid in the determination of the need for ITAAC or for an increased level of detail in the COLA description. The SECY categorized 10 programs as potentially requiring ITAAC or an increased level of detail in the COLA description, and the Commission requested that the staff present its conclusions on these 10 programs in a follow-up SECY. As has been discussed with the Staff, one of those 10, Reportability, is not considered an operational "program" like the others; NRC reporting requirements are typically implemented in procedures that directly reflect the detailed regulatory requirements for current plants. The following table describes the expected timeline for program implementation for the remaining programs. The implementation matrix was requested by the Staff in a meeting on March 3, 2005. Note that, Fitness for Duty, Access Authorization and Physical Security are combined into a single program for purposes of COLA description.

DRAFT PROGRAM IMPLEMENTATION MATRIX

<u>Program</u>	<u>FSAR Ref.</u>	<u>Implementation Timing</u>					
		<u>COLA Submittal</u>	<u>Prior to COL Issuance</u>	<u>Prior to Fuel Receipt</u>	<u>Prior to Fuel Load</u>	<u>Prior to Full Power</u>	<u>Commercial Operation</u>
Fire Protection	9.5.1	FP Description in COLA		Develop procedures, organization, responsibilities. Implement for buildings containing new fuel and adjacent areas, as appropriate.	Complete procedures and organization. Fully implemented		

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		<u>COLA Submittal</u>	<u>Prior to COL Issuance</u>	<u>Prior to Fuel Receipt</u>	<u>Prior to Fuel Load</u>	<u>Prior to Full Power</u>	<u>Commercial Operation</u>
Security, Access Authorization, Fitness for Duty	13.6	Security Plan submittal concurrent with COLA	Certain FFD program requirements apply during active construction, which may begin prior to COL issuance	Develop applicable procedures, contracts, organization.	Program fully implemented		
Radiation Protection Program	12.5	RP description in COLA		Program implemented in phases as needed for materials received on site	Fully implemented		
QA Program – Operations	17.2	Program description in COLA		Procedures developed, organization in place	Fully implemented		

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		<u>COLA Submittal</u>	<u>Prior to COL Issuance</u>	<u>Prior to Fuel Receipt</u>	<u>Prior to Fuel Load</u>	<u>Prior to Full Power</u>	<u>Commercial Operation</u>
Emergency Planning	13.3	Develop plant-specific ITAAC. Emergency Plan submitted concurrent with COLA. Certifications from state and local governments or, if not available, justification			Fully implemented – state and local agreements in place or justification submitted by applicant		
Licensed Operator Training	13.2.2	Program description in COLA		Sufficient operators trained, human factors training included, operators licensed per 10 CFR 55	10 CFR 50.54(m) requirements met. All licensed operators trained.		
Training	13.2	Program description in COLA		Sufficient plant personnel training complete	Initial training of plant personnel complete		