IMPLEMENTATION PLAN
LICENSE RENEWAL APPLICATION IMPROVED SAFETY REVIEW PROCESS IMPROVEMENTS

RECOMMENDATIONS	IMPLEMENTATION PLAN ACTIONS	ESTIMATED COMPLETION
I. Communications		
I.1 RLEP should continue to seek opportunities (e.g., DE Division Meeting, Regional counterpart meetings) to brief internal stakeholders involved in the LRA review process on program improvement initiatives (i.e., audit process guidance and enhancements, SER shell development).	RLEP agrees with this recommendation. 1) LR Audit Team Training was provided May 2005 to internal stakeholders involved with the Monticello & Palisades LRA review process. This training included program improvements (i.e. GALL revisions, audit process guidance, report shell enhancements) as well as lessons learned from past LRA reviews.	May 2005 Lead Sections RLEP A & B Complete
	2) RLEP plans to provide an orientation training session to all internal stakeholders, after the GALL Revisions have been published.	Dec. 2005 Lead Sections RLEP A&B Open
	3) The license renewal orientation web page has been updated with the revised process guidance documents and will continue to be updated as new revisions to guidance documents are issued.	May 2005 Lead Section RLEP B Complete
	4) The License Renewal PM Handbook has been revised to brief internal stakeholders on improvement initiatives during the kick off meeting after the work packages have been issued as described in Recommendation I.3.	June 2005 Lead Sections RLEP A Complete

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I.2	RLEP should continue to conduct lessons-learned meetings on the improved process with external stakeholders.	RLEP agrees with this recommendation. 1) A public meeting with NEI was held May 2005 to discuss the ISGs and Gall updates. This meeting included discussions of issues and lessons learned related to past LRA reviews from both the industry and NRC. 2) Another public meeting is scheduled for 7/21/05 with NEI to discuss lessons leaned on the improved process. A one time focus public meeting on the improved process will also be conducted with NEI upon issuance of the GALL revision in September 2005. The staff and industry have agreed to monthly working level contacts (i.e. phone, meeting) and six month public management meetings are also planned to be conducted.	May 2005 Lead Sections RLEP A & B Complete Dec. 2005 Lead Sections RLEP A & B Open June 2005 Lead Sections RLEP A & B Complete
I.3	Communications between technical reviewers and project team members should be enhanced on: (1) emerging technical issues; and (2) significant project team or technical reviewer findings. The enhanced communications would encourage an exchange of insights from their respective reviews.	RLEP agrees with this recommendation. The PM Handbook has been revised to reflect this new guidance. This will be done on a project basis after work packages are issued. The PM will remain cognizant of plant specific issues and coordinate communications among staff members. The PM will coordinate the kick off meeting as described in Recommendation I.6, between the technical reviewers and the project team at the beginning of the project. The PM will coordinate additional meetings with the staff to share information on emerging issues and significant findings as needed.	June 2005 Lead Sections RLEP A Complete.

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I.4	RLEP should enhance communications with the Regional offices by: (1) offering regions an opportunity to observe Headquarters on-site audit activities (i.e., DIPM scoping and screening, RLEP-B AMP/AMR), if their inspection resources allow; (2) coordinating project team site visits, in order to minimize potential impacts on planned inspections (the schedule should capture DE, DSSA, DRIP, DIPM, and Region LRA activities with emphasis on on-site audits coordination and SER input); (3) discussing the issuance of near term products (i.e., draft SER, inspection reports) that may impact each others area of review; and (4) discussing draft SER open items that may be closed out under regional inspection activities.	RLEP agrees with this recommendation. The PM handbook has been revised to incorporate this communication with the Regional Staff. The PM will offer the invitation to observe audit activities during the scheduling process and subsequently solicit regional inspection help for SER open item closure just prior to Regional inspections as appropriate For example, Point Beach SER open items were discussed with the Regional staff in order to determine if any open item may be closed out during regional inspection activities.	June 2005 Lead Section RLEP A Complete
I.5.	RLEP should conduct periodic, informal meetings with LRA review support organizations (i.e., OGC, DE, DSSA, etc...) to solicit feedback on the license renewal program.	RLEP agrees with this recommendation. The PM handbook has been revised to conduct informal meetings with internal stakeholders as necessary to discuss overall value added program enhancements identified during the review process.	June 2005 Lead Section RLEP A Complete
I.6	RLEP PMs should conduct internal kick-off meetings between the project team leader and assigned technical reviewers to discuss the LRA work assignments.	RLEP agrees with this recommendation and believes it should be combined with Recommendations I.1 and I.3. The PM handbook has been revised to incorporate this meeting.	June 2005 Lead Section RLEP A Complete
I.7	RLEP should enhance the Public License Renewal web page to provide abroad overview of the safety review process.	RLEP agrees with this recommendation. RLEP has provided the public web page to PMAS and it has been posted.	June 2005 Lead Section RLEP A Complete

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II. Guidance Documents		
II.1 RLEP should continue to review and update guidance documents to reflect lessons learned during the pilot and subsequent LRA reviews to date.	RLEP B agrees with this recommendation. The GALL revisions will be completed September 2005. The PM handbook has been revised to incorporate assessment recommendations. NRR Office Instruction RWNL-100 is currently being revised as necessary.	Sep. 2005 Lead Section RLEP B Open
II.2 RLEP-B should continue to enhance the AMP and AMR worksheets by incorporating additional guidance based on lessons learned.	RLEP B agrees with this recommendation. AMP/AMR worksheets were updated and were presented during contractor orientation training discussed in Recommendation I.1. The work sheets will be updated again following completion of the Gall revisions.	May 2005 Lead Section RLEP B Complete
II.3 RLEP-B should continue the expedited effort to update the GALL Report by September 2005.	RLEP B agrees with this recommendation. This is on schedule as described in Recommendation Section II.1.	Sep. 2005 Lead Section RLEP B Open
II.4 RLEP-B should discontinue the further development and refinement of the plant-specific SER input template and instead focus its efforts on modifying the audit report so that information is more easily transferred into the draft SER.	RLEP B agrees with this recommendation. A copy of the revised audit report template was provided during the training discussed in Recommendation I.1.	May 2005 Lead Section RLEP B Complete
II.5 RLEP should coordinate monthly meetings between the Interim Staff Guidance (ISG) coordinator, RLEP-B project team members and technical staff representatives to focus on the status of ISGs and emerging issues under review.	RLEP B agrees with this recommendation. To date, there are only two remaining ISGs. Meetings will be conducted on an as needed basis for emerging issues.	June 2005 Lead Section RLEP B Complete

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III. Staff Documents		
Audit Reports		
III-1 RLEP-B project team members should continue to pre-write audit reports based on the LRA and the template before going to the site to conduct the first audit.	RLEP B agrees with this recommendation. This expectation was provided to team members during the training discussed in Recommendation I.1, and has been used during the Palisades and Monticello LRA audit reviews.	May 2005 Lead Section RLEP B Complete
III-2 RLEP-B should strive to develop the audit report input within one week of completing the site visit and complete the first draft of the audit report before the scheduled public exit meeting.	RLEP B agrees with recommendation. RLEP B has established this expectation as a goal. This expectation was provided to team members during the training discussed in Recommendation I.1.	May 2005 Lead Section RLEP B Complete
III-3 RLEP-B should continue to peer review draft audit reports.	RLEP B agrees with this recommendation. RLEP B has implemented a peer review process for audit reports beginning with Brunswick and Point Beach.	May 2005 Lead Section RLEP B Complete
III-4 RLEP-B should modify the audit report format so that it better aligns with the format of the SER.	RLEP B agrees with this recommendation. RELP B will create a new SER shell in-line with the RELP A SER format, starting with Oyster Creek.	June 2006 Lead Section RLEP B Open

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Safety Evaluation Reports		
III-5 RLEP-A should ensure that the SER template under development, appropriately reflects the current technical staff SER input templates.	RLEP A agrees with this recommendation. The PM handbook has been revised to incorporate this guidance. The contractor prepares an SER shell that is consistent with technical staff templates, RLEP A has implemented this recommendation beginning with the Monticello SER.	June 2005 Lead Section RLEP A Complete
III-6 RLEP-A should update the SER style guide for use during LRA review	RLEP A agrees with this recommendation. The SER Style guide will be updated.	June 2006 Lead Section RLEP A Open
III-7 RLEP should provide training on the use of the SER shell to technical reviewers.	RLEP agrees with this recommendation. The PM handbook has been updated to incorporate this training during the kick-off meeting described in Recommendation I.3. Training on the use of the SER shell was provided in June 2005 to Monticello technical reviewers..	June 2005 Lead Section RLEP A Complete
III-8 RLEP-A PMs should ensure that the SER shell for their respective LRA under review is developed and provided to the technical staff and project teams within two months of receipt of the LRA submittal.	RLEP A agrees with this recommendation. The PM Handbook has been updated to incorporate this recommendation. The Monticello PM is the first to follow this recommendation.	June 2005 Lead Section RLEP A Complete
III-9 RLEP-A should make every attempt to provide a complete draft SER to OGC for their review and concurrence in order ensure continuity in the document.	RLEP agrees with this recommendation. The PM handbook has been updated to reflect this guidance.	June 2005 Lead Section RLEP A Complete

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III-10 RLEP-A should develop an Integrated Quality Initiative (IQI) process form to provide feedback to the technical staff reviewers and project teams on the quality of their SER input which identifies strengths and areas for improvement.	At this time RLEP believes that an IQI process feedback form to the applicable technical staff is unnecessary, since the quality of SER input is currently evaluated by the applicable technical reviewers section chief. However, RLEP may consider an informal feedback form to the section chiefs of the applicable technical reviewers.	June 2006 Lead Section RLEP A Open
Requests for Additional Information		
III-11 RLEP-A should establish clear expectations for PMs handling of RAIs and RAI responses. This should include: (1) the establishment of firm cut off dates for issuing RAIs and applicants RAI responses (e.g., within 30 days of final RAI issuance); (2) enhanced tracking and screening of RAIs received from RLEP-B project teams and technical reviewers to minimize duplicate or unnecessary RAIs; (3) periodically reviewing RAIs for inclusion in the LRA sufficiency review check list.	RLEP agrees with this recommendation. The PM handbook has been revised to incorporate this new guidance.	June 2005 Lead Section RLEP A Complete
III-12 The technical reviewers should develop SER input with corresponding place holders which focuses the development of their RAIs.	RLEP A met with DE Section Chiefs and Coordinators and the DSSA coordinator. This is an expectation for technical reviewers. The PM Handbook has been revised to include this recommendation	July 2005 Lead Section RLEP A, DE Complete

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IV. Project Team Composition		
IV-1 The RLEP budget should be adjusted to reflect individuals participating on project teams for purposes of training to support future LRA reviews.	RLEP agrees with this recommendation. For FY06 and FY07, 1.0 FTE was included for License Renewal Orientation. Section Chiefs and Team Leaders will ensure that individuals participating in audits for training purposes are informed to charge to the appropriate TAC number. The PM handbook has been revised to discuss the use of the License Renewal Orientation TAC.	May 2005 Lead Section RLEP A Complete
IV-2 DE technical reviewer's should be encouraged to participate in audits as a team member assigned to RLEP-B.	RLEP agrees with this recommendation. DE technical reviewers are encouraged to participate in audits as team members. The PM handbook has also been revised to incorporate this guidance during the internal kick off meeting described in Recommendation I.3.	May 2005 Lead Section RLEP A Complete
IV-3 Project Managers should participate in on-site audits by observing the audit, reviewing one or two AMPs and AMR line items (for PMs new to RLEP), and interacting with the applicant on headquarter staff issues.	RLEP agrees with this recommendation. The PM Handbook has been revised to reflect this recommendation.	June 2005 Lead Section RLEP A Complete

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V. Schedule and Resources		
V-1 RLEP-B and DE should enhance their work control processes in order to meet the schedules for providing inputs to the audit report and draft SER.	RLEP B agrees with this recommendation. RLEP B has developed templates, pre-written audit reports, and SER shells starting with Palisades and Monticello to enhance the work control process and to improve the schedule. DE will be also utilizing the new SER shell format for their technical evaluations.	June 2005 Lead Section RLEP B, DE Complete
V-2 RLEP should publish a generic schedule model to external stakeholders which includes the milestones and target dates for audits and inspections.	RLEP agrees with this recommendation. The generic schedule model was used for Brunswick, Monticello, and Palisades. The generic schedule model will be generalized and revised as needed based on additional experience.	June 2006 Lead Section RLEP A Regions Open
V-3 RLEP should continue to communicate with industry the importance of a quality LRA, the resource intensity during the first 10 months of the LRA review (e.g. response to technical reviewers and project team RAIs) and the applicant being able to adequately support the technical staff reviewers and project team.	RLEP agrees with this recommendation. The PM handbook has been revised to specify this communication by the PM during initial plant visit, and communications with the applicant.	June 2005 Lead Section RLEP Complete
V-4 RLEP contracts should be issued at least one month prior to receipt of a LRA to ensure that the contractor can promptly begin work upon receipt.	RLEP B agrees with this recommendation and has established this as a goal.	June 2005 Lead Section RLEP B Complete

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V-5	The LRA review schedule model should be re-evaluated to ensure optimum integration of DSSA/DE reviews, DIPM reviews/audits, regional inspections and RLEP-B audits.	RLEP agrees with this recommendation and believes it should be combined with Recommendations V-5 and V-8. Schedule models and results of current ongoing LRAs will be reviewed and evaluated to ensure optimum integration of all internal stakeholders inputs.	June 2006 Lead Section RLEP Open
V-6	RLEP-A should provide initial work packages for RLEP-B and technical staff review within two weeks of receiving the LRA submittal.	RLEP agrees with this recommendation . The PM handbook has been revised to incorporate this recommendation. RLEP A met this goal with the Monticello application.	June 2005 Lead Section RLEP A Complete
V-7	RLEP-A should establish firm cut-off dates with LRA applicants for accepting information for incorporation into the SER with open items.	RLEP agrees with this recommendation and believes it should be combined with Recommendation III-11. The PM handbook has been revised to incorporate this recommendation	June 2005 Lead Section RLEP A Complete
V-8	The NRR Process Standard for License Renewal and LRA Process Model should be updated to reflect the current review process, along with adjusting the schedule, work assignments, and budget assumptions accordingly	RLEP agrees with this recommendation. RLEP recommends that RLEP-B with support from RLEP-A develop a plan that integrates this item with Recommendations V-5 and V-11 to address these items. Successful completion of V-9 (a) supports development of this recommendation	June 2006 Lead Section RLEP A& B Open

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V-9	(a) The Work Planning Center (WPC) should prepare individual LRA "budget vs. actual" resource reports that show monthly and cumulative section, branch, division and NRR expenditures for each LRA, including both NRC staff hours and contract dollars. (b) RLEP-A should use these reports to identify out of standard resource expenditures and identification of areas for appropriate management action.	RLEP agrees with these recommendations. RLEP recommends that WPC with support from RLEP-A develop a plan to develop monthly LRA review resource reports. RLEP recommends that once the monthly LRA review resource reports are developed, RLEP-A update the PM Handbook to reflect the guidance for PM review of the monthly resource reports.	June 2006 Lead Section RLEP A, WPC Open June 2006 Lead Section RLEP A Open
V-10	The LRA review model should be modified to reflect a 2 month reduction in the DE review schedule from 10 months to 8 months.	RLEP met and discussed this recommendation with DE Section Chiefs and Coordinators in June 2005. DE will evaluate recommendation. RLEP A will follow up with DE.	June 2006 Lead Section RLEP A, DE Open
V-11	LRA resource allocations should be evaluated during the next budget cycle to reflect the current trend of the aging management work assignments for RLEP-B and the technical reviewers.	RLEP agrees with this recommendation and believes it should be combined with Recommendations V-5 and V-8. Successful completion of V-9 (a) supports development of this recommendation.	June 2006 Lead Section RLEP A&B Open
V-12	RLEP-B should review the scope and depth of their audit activities to determine if there are additional efficiencies that can be implemented.	RLEP B agrees with this recommendation and will develop an action plan to implement the recommendation.	June 2006 Lead Section RLEP B Open

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VI. Training		
VI-1 RLEP should continue to conduct initial and refresher training for individuals responsible for the conduct of LRA reviews. The training should cover the evolution of the improved process, regulatory requirements, guidance documents, and expectations for performing reviews. OGC should be invited to discuss their expectations for draft SER content, including legal requirements and necessity for the technical basis in staff's conclusions.	RLEP agrees with this recommendation and believes it should be combined with Recommendation I.1.	May 2005 Lead Section RLEP A & B Complete
VII. Other Areas		
VII-1 RLEP-A PMs should continue to ensure that the DIPM methodology audit is appropriately coordinated with DSSA in order to allow for a DSSA representative to participate in the onsite audit. The region should also be offered an opportunity to participate.	RLEP agrees with this recommendation. The PM handbook has been revised to incorporate this recommendation. DSSA's contractor participated in the DIPM audit for Palisades.	June 2005 Lead Section RLEP A Complete
VII-2 Once the updated GALL Report is issued in September 2005, RLEP should develop and implement database for tracking all "exceptions to the GALL Report." The database should include the bases for acceptance/denial and an evaluation of consideration for updating the GALL Report.	RLEP agrees with this recommendation and will implement an action plan to address this recommendation.	June 2006 Lead Section RLEP B Open
VII-3 RLEP should conduct a feasibility study to determine if a GALL Report-like document can be developed for scoping and screening based on past plant reviews and used by a similar AMP/AMR on-site project team.	RLEP agrees with this recommendation and has started work to develop an approach for researching a scoping and screening document.	June. 2006 Lead Section RLEP B Open