

NEI Handout

NRC/NEI LATF Meeting
July 28, 2005

LAR Guideline

- The current draft of NEI 06-xx, "Guidelines for Preparing License Amendment Requests," is dated January 2005
- A 5-person LAR Team has been established to expedite progress
 - Prepare a near-term draft guideline and a long-term schedule in time for the 2005 Licensing Forum
 - Expand 2002 NEI White Paper on LAR format & content
 - Add guidance on use of precedent
 - Add lessons learned from the NRC/NEI RAI project
- Obtain industry peer review and finalize the document
- Submit to NRC for endorsement in 2006
- Distribute the final endorsed guideline for licensee use

Generic Issues Management

- The issue – NRC use during plant-specific LAR reviews of information developed as part of an open generic issue
- A 7-person GIM Team has been established to prepare a Problem Statement and examples in time for the 2005 Licensing Forum
- Potential topics to explore:
 - Backfit considerations (new or different interpretations; applicability of new information; use of compliance exception)
 - Burden of proof (licensee? NRC?)
 - Impact of NRC DPO process (justification threshold)
 - Making a staff “finding” (definition; documentation)
 - Role of management (oversight; accountability; CRGR)

Operability Determination Process

- Feb-May 2005 public meetings – NEI RAI Team participated in developing a new IM chapter on ODP
- Early June – NRC published a final draft IM chapter
- July 14 – NEI workshop very well attended by licensee operations and engineering staff
- September – NRC scheduled to publish final IM chapter
- 2005 Licensing Forum – NRC is invited to join NEI in conducting an ODP implementation workshop
- Ongoing – NEI continue to collect industry comments to share with NRC for possible incorporation in future IM revisions

FAQ

- NEI add FAQ module to LATF website
- Discuss protocol for NRC access
- Separate pages for:
 - NRC/NEI LATF interpretations
 - ODP examples
 - 50.59 examples
 - Other topics, as needed
- Demonstrate at 2005 Licensing Forum

Topical Report Process

- An important process similar to TSTF Travelers and CLIIPs
- NEI LATF is concerned that recent NRC process changes described in May-June letters to NEI, EPRI, and the OGS will decrease the efficiency and effectiveness of the TR process
 - Changes to other NRC processes could free resources for review of TRs
- A 7-person TR Team has been established to:
 - By 9/1 submit a response to the NRC letters
 - Propose ideas for longer-term dialogue with NRC, for example
 - Identify the proper level of attention to give each TR
 - Define the scope of TR use early in the process
 - Use of pre-application meetings and communication plans