Generic Letter Clarification
NRC Workshop

January 9-10, 2006

Table of Contents

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Question #1 Communication Protocol
NRC GL

Q-1 Describe your formal agreements with your transmission system operator (TSO) to promptly notify you when conditions of the surrounding grid are such that degraded voltage (i.e., below TS requirements) or LOOP could occur following a trip of the reactor unit(s).

(a) What is the time period required for the notification?

(b) Describe the procedures to periodically check with the TSO to determine the grid condition and ascertain any conditions that would require a notification. If you do not have procedures, describe how you assess grid condition that would require notifications.

(c) Describe how NPP operators are trained and tested on the use of the procedures in 1(b).

(d) Describe the grid conditions that would trigger a notification.

(e) If you do not have a formal agreement with your TSO, describe why you believe you comply with the provisions of GDC 17 as stated above, or describe what actions you intend to take to establish the necessary formal agreement with your TSO.

(f) If you have existing formal interconnection agreements and related protocols that ensure adequate communication and coordination between the NPP and the TSO, describe such agreements to promptly notify you when the conditions of the surrounding grid could result in degraded voltage (i.e., below TS nominal trip setpoint value requirements; including NPPs using allowable value in its TSs) or LOOP after a trip of the reactor unit(s).

(g) Describe the low switchyard voltage conditions that would initiate operation of plant degraded voltage protection.

Clarification

Q-1 Communication Protocol

Conditions of the surrounding grid could result in degraded voltage (i.e., below degraded grid nominal protection setpoint values) or LOOP after a trip of the reactor unit(s).

1. Does a communications protocol exist that drives prompt notification between the Transmission System Operator (TSO) and your Nuclear Power Plant (NPP), when conditions of the surrounding grid are such that degraded voltage (i.e., below TS requirements) or LOOP could occur following a trip of the reactor unit(s)?

2. Does the TSO have a set time period to notify your NPP when these conditions occur?
3. Describe the grid conditions that would trigger a notification.
4. Is it necessary for your NPP to proactively contact the TSO in order to uncover a low-voltage or unit trip contingency problem affecting your NPP?
5. Are your NPP control room operators periodically trained and tested on making the proper response to offsite power issues in the context of Technical Specifications (TS)?
6. If you do not have an agreement with your TSO, describe how you ensure the offsite power system continues to meet the provisions of GDC 17 or describe what actions you intend to take to establish the necessary agreement with your TSO.
7. Describe the low switchyard voltage conditions that would initiate operation of plant degraded voltage protection.

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Explanation

Without changing the intent of the proposed questions, this clarification requests the intended responses and substantiations of the associated processes that focus on the operation of the local bulk power system in a manner that is consistent with the NPP design and licensing bases. This includes normal operation and capability/capacity in response to design basis events. Also, this clarification addresses appropriate content and timeliness of communication between the TSO and the NPP.

Part Q-1f is now redundant; thus it is eliminated.

Question #2 Grid Conditions Determination

NRC GL

Q-2 Describe how you ensure (i.e., the criteria and any methodologies used to assess) that the offsite power system will remain operable following a trip of your NPP.

(a) Does your NPP's TSO use a RTCA program, or an online analytical transmission system studies program or other equivalent predictive methods, to determine the grid conditions that would make the NPP offsite power system inoperable during various contingencies? Provide a brief description of such a program used by the TSO.

(b) Does your NPPs TSO use the RTCA program as the basis for notifying the NPP when such a condition is identified? If not, how does the TSO notify the NPP of such a condition on the grid?

(c) Would the RTCA program utilized by your TSO identify a condition in which a trip of the NPP would result in switchyard voltages (immediate and/or long term) below TS nominal trip setpoint value requirements (including NPPs using allowable value in its TSs) and would actuate plant degraded voltage protection? If not discuss how such a condition would be identified on the grid.

(d) How frequently does the RTCA program update?

(e) Provide details of RTCA-identified contingency conditions that would trigger an NPP notification from the TSO.

(f) Is the NPP notified of periods when the RTCA program is unavailable to the TSO, and does the NPP conduct an offsite power system operability determination when such a notification is received?

(g) After an unscheduled inadvertent trip of the NPP, are the resultant switchyard voltages verified by procedure to be bounded by the voltages predicted by the RTCA?

(h) If an RTCA program is not available to the NPP's TSO, are there any plans for the TSO to obtain one? If so when?

(i) If an RTCA program is not available, does your TSO perform periodic studies to verify that adequate offsite power capability, including adequate NPP post-trip switchyard voltages (immediate and/or long-term), will be available to the NPP licensee over the projected timeframe of the study?

i. *Are the key assumptions and parameters of these periodic studies translated into TSO guidance to ensure that the transmission system is operated within the bounds of the analyses?*

ii. *If the bounds of the analyses are exceeded, does this condition trigger the notification provisions discussed in question 1 above?*

(j) If your TSO does not use, or you do not have access to the results of a RTCA program, or your TSO does not perform and make available to you periodic studies that determine the adequacy of offsite power capability, please describe what compensatory actions you intend to

take to ensure that the offsite power system will be sufficiently reliable and remain operable with high probability following a trip of your NPP.

Clarification

Q-2 Grid conditions Determination

Many activities ensure that the offsite power system conditions are met following a trip of your NPP.

1. Describe the analytical methods that the TSO use to ensure that the offsite power system conditions are met following a trip of your NPP.
2. Identify the predictive method(s) used to determine the grid conditions that would make the NPP offsite power system inoperable following a trip of your NPP. Provide a brief description of the predictive method(s) used (RTCA program, online analytical transmission system studies program, or other predictive methods).
3. Does the TSO base its contingent voltage on real-time data (RTCA program)? If not, how frequently does the TSO determine the low-voltage threat of a trip of your NPP?
4. Would the predictive method(s) used to determine the grid conditions identify a condition in which a trip of your NPP would result in switchyard voltages below the TS requirements?
5. How frequently are the results of the analytical method updated?
6. Does the TSO notify your NPP of a low-voltage or unit trip contingency problem based on the predictive method(s) used to determine the grid conditions?
7. When the method(s) used to determine the grid conditions is unavailable, does the TSO notify your NPP? What NPP action is taken (alternate methods, input from alternate organizations, input from other indicators, etc.)?
8. Does the TSO benchmark the predictive method(s) used to determine the grid conditions against actual data from your NPP, e.g. sequence-of-event data or traces taken during an NPP trip?

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Explanation

Without changing the intent of the proposed questions, the clarification requests the intended responses and substantiations of the associated processes.

The RTCA program does not calculate the probability of voltage levels for a particular bus or any grid; it is a deterministic tool.

Q-2(h), (i), & (j) impose the RTCA program as the only analytical method available that is not the case. The process information is addressed in the above clarifications.

Question #3 TS Operability
NRC GL

Q-3 NPP TS require that the plant's offsite power system be operable as part of the plant's limiting condition of operation. Describe how you ensure (i.e., the criteria and any methodologies used to assess) that the NPP's offsite power system and safety-related components will remain operable when switchyard voltages are degraded.

(a) When the TSO notifies the NPP operator that a trip of the NPP or the loss of most critical transmission line or the largest supply to the grid would result in switchyard voltages (immediate and/or long-term) below TS nominal trip setpoint value requirements (including NPPs using allowable values in its TSs) and would actuate plant degraded voltage protection, is the NPP offsite power system declared inoperable under plant TSs? If not, why not?

(b) If onsite safety-related equipment (e.g., emergency diesel generators or safety-related motors) is lost when subjected to a double sequencing (LOCA with delayed LOOP event) as a result of the anticipated system performance and is incapable of performing its safety functions as a result of responding to an emergency actuation signal during this condition, is the equipment considered inoperable? If not, why not, including any compensatory actions?

(c) Describe your evaluation of onsite safety-related equipment to determine whether it will operate as designed during the condition described in question 3(b).

(d) When the NPP is notified by the TSO of other grid conditions that may impair the capability or availability of offsite power, are any plant TS action statements entered? If so, please identify them.

(e) If you believe your plant TSs do not require you to declare your offsite power system or safety-related equipment inoperable in any of these circumstances, explain why you believe you comply with the provisions of GDC 17 and your plant TSs, or describe what compensatory actions you intend to take to ensure that the offsite power system and safety-related components will remain operable when switchyard voltages are degraded.

(f) Describe how NPP operators are trained and tested on the compensatory actions mentioned in questions 3(a) through 3(e).

Clarification

Q-3 TS Operability

Your NPP TS require that the offsite power system be operable as part of the plant's Limiting Condition of Operation. Describe the actions taken by your NPP when switchyard voltages are below the TS requirements.

1. Describe the actions taken by your NPP when the TSO notifies you that post-trip switchyard voltages may be below the TS requirements.

2. When your NPP is notified by the TSO of other grid conditions that may impair the capability or availability of offsite power, are any plant TS action statements entered? If so, identify them.
3. If you believe your NPP TSs do not require you to declare your offsite power system or safety-related equipment inoperable in any of these circumstances, describe what actions you intend to take to ensure that the offsite power system and safety-related components remain operable when switchyard voltages are degraded.
4. Are your NPP control room operators periodically trained and tested on making the proper response to offsite power issues in the context of Technical Specifications (TS)?

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Explanation

Q-3a -- remove the phrase “or the loss of most critical line or the largest supply to the grid” and focus on nuclear plant.

Q-3b – Double sequencing is not part of NPP design or licensing basis; therefore, it is not a regulatory requirement.

Q-3c – Double sequencing is not part of NPP design or licensing basis; therefore, it is not a regulatory requirement.

Q-3e – Mis-match of interpretations of requirements of GDC 17 exists between NRC and industry. Actions should be limited to those of NPP TS (LCO).

Question #4 Post Trip Operability
NRC GL

Q-4 NPP TS require that the plant's offsite power system be operable as part of the plant's limiting conditions of operation. Describe how you ensure (i.e., the criteria and any methodologies used to assess) that the offsite power system will remain operable following a trip of your NPP.

(a) Do the NPP operators have any guidance in plant TS bases sections, the final safety analysis report, or plant procedures regarding situations where the condition of plant-controlled or –monitored equipment (e.g., voltage regulators, auto tap changing transformers, capacitors, static VAR compensators, main generator voltage regulators) can adversely affect the operability of the NPP offsite power system?

(b) Describe how NPP operators are trained and tested on the guidance and procedures described question 4(a).

(c) If your TS bases sections, the final safety analysis report, or plant procedures do not provide guidance regarding situations where the condition of plant-controlled or –monitored equipment can adversely affect the operability of the NPP offsite power system, explain why you believe you comply with the provisions of GDC 17 and the plant TSs, or describe what actions you intended to take to provide guidance on situations where the condition of plant-controlled or –monitored equipment can adversely affect the operability of the NPP offsite power system.

Clarification

Q-4 Post Trip Operability

Your NPP TS requires that the offsite power system be operable as part of the plant's Limiting Conditions of Operation. Is there an analysis to document the effect of a NPP trip on the offsite power system?

1. How often or under what circumstance is this analysis updated?
2. Do your NPP operators have any guidance in NPP TS bases sections, the final safety analysis report, or plant procedures regarding situations where plant-controlled equipment can adversely affect the operability of the NPP offsite power system?
3. Are your NPP control room operators periodically trained and tested on making the proper response to offsite power issues in the context of Technical Specifications (TS)?
4. If your TS bases sections, the final safety analysis report, or plant procedures do not provide guidance regarding situations where the condition of plant-controlled or monitored equipment can adversely affect the operability of the NPP offsite power system, describe what actions you intended to take to provide such guidance.

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Explanation

NPPs are not immediately concerned with the TSO's actions following a trip. Operations personnel are focused on safe shutdown and post-trip assessment of root cause and system/equipment response.

System analysis evaluation of the impact of NPP trip on offsite power is the responsibility of the NPP engineering design organization.

This clarification addresses appropriate content and timeliness of communication between the TSO and the NPP.

Question #5 Maintenance Risk Assessments
NRC GL

Q-5 *Describe how you perform grid reliability evaluations as part of the maintenance risk assessments required by 10 CF 50.65(a)(4).*

(a) Is a grid reliability evaluation performed at your NPP as part of the maintenance risk assessment required by 10 CFR 50.65(a)(4) before performing grid-risk-sensitive maintenance activities? This includes surveillances, post-maintenance testing, and preventive and corrective maintenance that could increase the probability of a plant trip or LOOP or SBO coping capability, for example, before taking a risk-significant piece of equipment (such as an EDG, a battery, a steam-driven pump, and alternate AC power source) out of service?

(b) Is grid status monitored by some means for the duration of the grid-risk-sensitive maintenance to confirm the continued validity of the risk assessment and is risk reassessed when warranted? If not, how is the risk assessed during grid-risk-sensitive maintenance?

(c) Is there a seasonal variation in the stress on the grid in the vicinity of your NPP site? Is there a seasonal variation in the LOOP frequency? If yes to either question, discuss when do they occur and what is the magnitude of the variations.

(d) Are seasonal variations in the probability of a LOOP at your plant site considered in the grid-risk-sensitive maintenance evaluation? If not, what is your basis for not considering them?

(e) Describe your contacts with the TSO to determine current and anticipated grid conditions as part of the grid reliability evaluation performed before conducting grid-risk-sensitive maintenance activities.

(f) Describe your use of a formal agreement with your TSO or use formal procedures to assure that a worsening grid condition has not emerged during a maintenance activity in progress.

(g) Do you contact the TSO periodically for the duration of the grid-risk-sensitive maintenance activities?

(h) Describe how NPP operators and maintenance personnel are trained and tested on these agreements and procedures in question 5.(f).

(i) Is the TSO expected to notify the NPP of such a condition? If so, why can the TSO be relied on to do so?

(j) If a grid reliability evaluation performed as part of the maintenance risk assessment required by 10 CFR 50.65(a)(4) does not consider or rely on some arrangement for communication with the TSO, explain why you believe you comply with 10 CFR 50.65(a)(4).

(k) If risk is not assessed (when warranted) based on continuing communication with the TSO throughout the duration of grid-risk-sensitive maintenance activities, explain why you believe you have effectively implemented the relevant provisions of the endorsed industry guidance associated with the maintenance rule.

(l) With respect to questions 5.(j) and 5.(k), you may, as an alternative, describe what actions you intend to take to ensure that the increase in risk that may result from proposed grid-risk-sensitive activities is assessed before and reassessed during grid-risk-sensitive maintenance activities, respectively, during existing, imminent, or worsening degraded grid reliability conditions.

Clarification

Q-5 Maintenance Risk Assessments

Before performing maintenance on risk significant equipment, a risk assessment by your NPP is required by 10 CFR 50.65(a)(4).

a. Maintenance activities in this context includes: surveillances, post-maintenance testing, and preventive and corrective maintenance.

b. The NRC is particularly interested in activities that could significantly increase (an order of magnitude) the possibility of a plant trip or increase the estimated frequency of a LOOP.

c. Specifically, the NRC is interested in 10 CFR 50.65(a)(4) practices regarding maintenance on EDGs, safety-related batteries, safety-related steam-driven pumps, or a 10 CFR 50.63 alternate AC power source.

1. Describe how your NPP performs risk assessments required by 10 CFR 50.65(a)(4), when maintenance is proposed on risk significant equipment.
2. How are emergent issues with the grid identified and captured in the plant risk assessment done in the course of 10 CFR 50.65(a)(4) work?
3. Is there a seasonal variation in the probability of a LOOP in the vicinity of your NPP site?
4. Are current and anticipated grid conditions considered as part of the Maintenance Rule 10 CFR 50.65(a)(4) risk assessment performed while conducting maintenance activities on risk significant equipment.
5. Are there additional risk assessments at your NPP to ensure that the risk is reassessed for emerging conditions that may result from a degraded grid condition, during maintenance activities on risk significant equipment?

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Explanation

This Q-5 (Maintenance risk assessments) closely approaches the content of Q-6 (Maintenance risk assessments); thus, the clarification separates the NPP maintenance activity risk assessment and the local transmission system maintenance activity risk assessment. The proposed NRC questions commingled and duplicated the topics.

PRA staff can address response.

NRC already has data concerning any variation in the LOOP frequency.

Seasonal variations in the possibility of a LOOP at a NPP site are considered in the SBO rule compliance; thus, they are not considered in the course of 10 CFR 50.65(a)(4) work. Generally, NPPs consider periods when the grid is more vulnerable to failure when they do grid-risk significant maintenance.

Updating risk assessments is part of the process of 10 CFR 50.65(a)(4) maintenance on risk significant equipment.

Q-5a -- Should be ‘possibility’ rather than ‘probability’. No way to quantify remote maintenance activities, seasonal activities, etc.

Q-5c – Remove ‘stress on grid’ since not defined. Off site power capacity.

Q-5d -- Are there identifiable periods of increased risk? May not be tied to time when other issues are more significant, i.e. drought, fire, special transfer periods, etc.

Question #6 Maintenance Risk Assessments
NRC GL

Q-6 Describe how you use the results of your risk assessment, including the results of the grid reliability evaluations, in managing maintenance risk, as required by 10 CFR 50.65(a)(4).

(a) Describe how the TSO coordinates transmission system maintenance activities that can have an impact on the NPP operation with the NPP operator.

(b) Describe how the NPP operator coordinates NPP maintenance activities that can have an impact on the transmission system with the TSO.

(c) Describe how you consider, and implement if warranted, the rescheduling of grid-risk-sensitive maintenance activities (activities that could (i) increase the likelihood of a plant trip, (ii) increase LOOP probability, or (iii) reduce LOOP or SBO coping capability) under existing, imminent, or worsening degraded grid reliability conditions?

(d) If there is an overriding need to perform grid-risk-sensitive maintenance activities under existing, or imminent conditions of degraded grid reliability, or continue grid-risk-sensitive maintenance when grid conditions worsen how do you effectively implement when warranted, appropriate risk management actions, including alternate equipment protection and compensatory measures to limit or minimize risk?

(e) Describe how these actions (in question 6.(a) through (d)) are accomplished and how the procedures in place provide reasonable assurance they are accomplished consistently and effectively.

(f) Describe how NPP operators and maintenance personnel are trained and tested on these procedures (in question 6.(e)).

(g) If there is no effective coordination between the NPP operator and the TSO regarding transmission system maintenance or NPP maintenance activities, please explain why you believe you comply with the provisions of 10 CFR 50.65(a)(4).

(h) If you do not consider and effectively implement appropriate risk management actions during the conditions described above, explain why you believe you effectively addressed the relevant provisions of the associated NRC-endorsed industry guidance.

(i) You may, as an alternative to questions 6.(g) and (h) describe what actions you intend to take to ensure that the increase in risk that may result from grid-risk-sensitive maintenance activities is managed in accordance with 10 CFR 50.65(a)(4).

Clarification

Q-6 Maintenance Risk Assessments

Before performing maintenance on risk significant equipment, a risk assessment by your NPP is required by 10 CFR 50.65(a)(4). How your NPP uses the results of your risk assessments in managing maintenance risk as required by 10 CFR 50.65(a)(4) is important. Such maintenance activities include those that could (i) increase the likelihood of a plant trip, (ii) increase LOOP probability, or (iii) reduce LOOP or SBO coping capability.

1. Describe how the TSO coordinates with your NPP personnel about transmission system maintenance activities that can have an impact on your NPP operation.
2. Describe how your NPP personnel coordinate with the TSO about your NPP maintenance activities that can have an impact on the transmission system.
3. Describe the process used by your NPP to assure the appropriate action, if a worsening or degraded grid condition were to develop during a planned or in-progress maintenance activity on risk significant equipment.
4. How does your NPP effectively implement appropriate risk management actions, if there were an overriding need to perform such maintenance activities under worsening or degraded grid conditions?
5. Are your NPP control room operators periodically trained and tested on making the proper responses associated with maintenance on risk significant equipment?
6. Are there additional risk assessments at your NPP to ensure that that the risk is reassessed for emerging conditions that may result from proposed maintenance activities, during maintenance activities on risk significant equipment?

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Explanation

This Q-6 (Maintenance risk assessments) closely approaches the content of Q-5 (Maintenance risk assessments); thus, the clarification separates the NPP maintenance activity risk assessment and the local transmission system maintenance activity risk assessment. The proposed NRC questions commingled and duplicated the topics.

Q6-e,f,g,h,i only apply with improper responses in a,b,c,d.

If there is no effective coordination between the NPP operator and the TSO regarding transmission system maintenance or NPP maintenance activities is a question that is unnecessary.

Question #7 Grid restoration
NRC GL

Consistent with the recommendations in Section 2 of RG 1.155, you are expected to have established an agreement with your plant's TSO that identifies local power sources that could be made available to re-supply your plant following a LOOP event. Briefly describe any agreement made with the TSO.

(a) Describe how NPP operators are trained and tested on identifying and using local power sources to re-supply your plant following a LOOP event.

(b) If you have not established an agreement with your plant's TSO that identifies local power sources that could be made available to re-supply your plant following a LOOP event, explain why you believe you comply with the provisions of 10 CFR 50.63, or describe what actions you intend to take to establish compliance.

Clarification

Q-7 Grid Restoration

Consistent with the guidance in Section 2 of RG 1.155, your NPP is expected to have established an agreement with the TSO that identifies local power sources that could be made available to re-supply your NPP following a LOOP event.

1. Briefly describe the grid restoration process used by your NPP and the TSO.
2. Are your NPP control room operators periodically trained and tested on making the proper response to offsite power issues in the context of Technical Specifications (TS)?
3. If you have not established an agreement with the TSO that identifies grid restoration activities, explain what alternative actions your NPP would take to re-supply your NPP following a LOOP event.

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Explanation

The TSO has many options to configure restoration using available local power sources; NPPs do not want to limit opportunities. Specific identification of sources may limit the ability of the TSO to restore a wide-spread grid outage.

For purposes of the SBO rule, it was assumed that offsite power was restored (or EAC sources would be made available) at the end of the coping period and the plant would be exit the SBO condition.

Proposed questions needed TSO assistance to answer a & b; NRC could use the NRC-FERC MOA to obtain the desired information.

NERC requires that nuclear plants be given highest priority for restoration, since they provide large baseload generation. TSO determines how to return grid. NPP personnel are not trained to use local power sources; reliance on the TSO should suffice.

Question #8 SBO Coping
NRC GL

Describe how your NPP maintains its SBO coping capabilities in accordance with 10 CFR 50.63.

(a) Has your NPP experienced a total loss of offsite power caused by grid failure since the plant's coping duration was initially determined under 10 CFR 50.63?

(b) If so, have you reevaluated the NPP using the guidance in Table 4 of RG 1.155 to determine if it should be assigned to the P3 offsite power design characteristic group?

(c) What were the results of this reevaluation, and was the initially determined coping duration for the NPP adjusted?

(d) If your NPP has experienced a total loss of offsite power caused by grid failure since the plant's coping duration was initially determined under 10 CFR 50.63 and has not been reevaluated using the guidance in Table 4 of RG 1.155, explain why you believe you comply with the provisions of 10 CFR 50.63 as stated above, or describe what actions you intend to take to ensure that the NPP maintains its SBO coping capabilities in accordance with 10 CFR 50.63.

Clarification

Q-8 SBO Coping

Your NPP maintains its SBO coping capabilities in accordance with 10 CFR 50.63.

1. Has your NPP experienced a grid-related LOOP, since your NPP's coping duration was initially determined under 10 CFR 50.63?
2. If so, has your NPP reevaluated the coping capability analysis and configuration, using the guidance in Table 4 of RG 1.155, to determine whether or not your NPP characteristic group should be assigned to the P3 offsite power design characteristic group?
3. If your NPP was reevaluated, describe the results and identify whether or not the initially determined 10 CFR 50.63 coping duration for your NPP was adjusted?

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Explanation

NRC analysis of grid disturbance events reported a frequency of 0.020 per site year; thus, the assumption is equal to or greater than once in 20 site-years in accordance with RG 1.155, "Station Blackout." Evaluations of the impact of LOOP on a multi-unit site should not be on a plant-specific basis.

SBO rule coping assessment is based upon the following:

- Site susceptibility to grid-related LOOP events
- Frequency of LOOP due to weather related events
- Independence of off-site power
- Off-site AC power design configuration

NUMARC 8700 (endorsed by NRC) has specific definition of grid related event, how to evaluate them, & establishing criteria.

SBO is LOOP and selected AC sources.

If a NPP site has not had a LOOP and not been reevaluated, then no actions are required to ensure that the SBO coping capabilities are in accordance with 10 CFR 50.63. This clarification acknowledges that the licensee would have submitted an LER following such a LOOP event; however, the NRC may not be aware of the closure documents related to the commitment to reexamine the coping analysis.

Question #9 Regulatory Compliance
NRC GL

If you determine that any action is warranted to bring your NPP into compliance with NRC regulatory requirements, including TSs, GDC 17, 10CFR50.65(a)(4), 10CFR50.63, 10CFR55.59, or 10CFR50.120, describe the schedule for implementing it.

Clarification

Eliminate.

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Explanation

This question is already addressed by responses to the earlier questions associated with existing regulations and NPP licensing bases.