

RIC 2006
Session T1E
Licensing Issues

LICENSING ACTION
TASK FORCE (LATF)

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LATF Topics for RIC 2006

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Role of LATF

- Work with NRC to establish clear processes, e.g., CLIIP
- Monitor NRC submittal products to promote standardization and consistency
- Provide feedback to NRC on process experience and lessons learned
- Assist industry in communicating emerging process concerns to NRC. Recent examples:
 - definition of “performance deficiency”
 - implementation timing for steam generator CLIIP

Role of LATF (continued)

Feedback to NRC on Definition of “Performance Deficiency”

- NRC Inspection Manual definition goes beyond typical practice (Manual Chapter 0612)
 - PD exists if licensee fails to adhere to widely accepted industry standard, even if licensee is not committed to the standard
- NEI LATF requested basis for definition
- Definition is contrary to CLB, and changes the CLB without due process
- Definition devalues NRC SERs and docketed licensee commitments
- Definition bypasses the backfitting process

Role of LATF (continued)

Feedback to NRC on GL 2006-01 (Steam Generator Tube Integrity)

- CLIP vs. GL 2006-01
- CLIP
 - 1-year target implementation
 - Scope based on TSTF-449
 - Plant-specific implementation may take longer than 1 year based on design, procurement, and outage-management schedules
- GL 2006-01 deadline
 - Deadline of 5/31/06
 - Submittal by 5/31 is condition for avoiding burdensome information request (duplicates TSTF)
 - Introduced schedule instability and uncertainty

NEI 06-02

- License Amendment Request (LAR) guideline
 - Industry comments on draft revision 4 were due March 1
 - NEI distribute final draft for industry comment during May-June
 - Submit to NRC for endorsement July 1
 - Discuss at NEI Licensing Forum 2006 in October

Generic Issue Management (GIM)

- Document industry viewpoints in a NEI White Paper
- Publish draft revision 0 for industry comment in mid-2006
- Clarify definitions and responsibilities
- Clarify treatment of generic issues during plant-specific licensing actions
- Align reviewer/licensee expectations

GIM (continued)

- Topics for NEI White Paper
 1. Key definitions and concepts
 - Increased operating authority (Perry decision)
 - Use of precedent
 - Burden of proof
 - Cost-benefit parameters
 - Standardizations
 - Current licensing basis
 2. Generic vs. Plant-Specific Resolution
 - Stability of plant-specific baseline
 - CLB
 - Tech Specs
 - Procedures

GIM (continued)

- Topics for NEI White Paper
 3. Use of Licensing Processes
 - 10 CFR 50.59 change process
 - 10 CFR 50.90 license amendment process
 - Task Interface Agreement (TIA) process
 - Operability Determination Process (ODP)
 - Consolidated Line Item Improvement Process (CLIIP)
 - Inspection Process
 4. Resolution Options for Generic Issues
 - Rulemaking process
 - Generic Safety Issue (GSI) process
 - Backfitting process
 - Generic communication
 - Voluntary industry initiative
 - Risk-informed, performance-based solution
 - Plant-specific commitment

GIM (continued)

Prospective Issues:

- Setpoints
- Control Room Habitability
- Alternative Source Term
- 10 CFR 50.46 Reporting Requirements
- Grid Reliability
- Steam Generator Tube Integrity
- 10 CFR 50.72 & 50.73 Reporting Requirements

NRC/NEI LATF Interface

- Quarterly meetings:
 - NEI LATF Steering Group
 - NRC/NEI LATF public meeting
- Annual Licensing Forum
- Ad Hoc Workshops
- Use team approach to work products:
 - ODP Task Force (IM Chapter 9900)
 - LAR team (NEI 06-02, LAR Guideline)
 - GIM team (GIM White Paper)
 - Methods team (10 CFR 50.46 reporting guideline)
 - Topical Report team (periodic meetings with NRC)
 - RAI team (complete → input given to LAR team)

NRC/NEI LATF Interface (continued)

- Excellent forum for communication in both directions
 - Early identification of process problems
 - Impact surveys
 - Lessons learned
 - Implementation experience
 - Process improvement options
 - Standardization ideas
 - Licensing input for technical issues