

ACCELERATED iSTS CONVERSION (PILOT)

A/2

- Purpose of This Presentation: Information
- Measure for Success of This Presentation:
 - LT understands the current status of this initiative

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Background/History

- Standard Technical Specifications - 1979
NUREG-0123 (BWR5)
NUREG-0212 (CE)
NUREG-0452 (W)
- improved Standard Technical Specifications (iSTS)
 - Rev. 0 - September 1992
 - Rev. 1 - April 7, 1995
 - Rev. 2 - April 30, 2001
- Revisions incorporate generic changes to iSTS; over 400 TSTFs since iSTS Rev. 0
- iSTS, Rev. 3 - June 2004

iSTS Conversion Status

- Plants implementing iSTS - 69
- Plants currently converting to iSTS - 5
 - DC Cook, 1&2 (4/12/04)
 - Beaver Valley, 1&2 (10/04)
 - Monticello (4/05)
- Plants considering converting to iSTS - 30
- Plants not considering converting to iSTS - 0
(Note: There were 5 plants in this category until NRC initiated the pilot program for the accelerated review process)

GOALS

- Reduce conversion review time

Current Process

16 months

Accelerated Review

8 months (goal, NOT a metric!)

- Efficiency and Burden

Current Process

2.0 FTE

Accelerated Review

\leq 2.0 FTE

- Improved Predictability

- Licensees plan funds 1-2 years in advance of submittal (Estimate ~\$3 million to convert)
- Savings realized only upon implementation - Technical work begun 1 year prior to submittal; NRC reviews can take 12-20 months; implementation can take 6-12 months

CONCEPTS

- Team approach vs. individual reviews over extended period
- Decisions by licensee and NRC as issues arise vs. formal RAIs and licensee response
- Web based issue tracking
- Contentious issues resolved at public meetings
- Improved Public Access
 - Access to Web Tracking System
 - Issues documented in meeting notices and minutes
 - Public meetings

HOW SAVINGS REALIZED

- Reduce relearning time between submittals
- Reduce iterative re-thinking of issues by NRC and licensee
- Reduce volume of formal correspondence (Both NRC RAIs and licensee submittals)
- Synergy of licensee and NRC staff teams
- Web based interactions & tracking
- Categorizing of TS changes as part of initial application

CHALLENGES

- Delay/Deferral of other TSS work during review periods
 - Strategy: Coordinate work with WPC and DLPM
- I&C is critical path due to volume of changes, deviations from iSTS, Beyond Scope Items, and TSS reviewer availability - may require more review time than planned
 - Strategy: Request additional support from EEIB

OTHER CONSIDERATIONS

- Initial Indicators are Positive
 - Interest from long time unconverted plants
 - D. C. Cook initiated request to be a pilot plant
 - Beaver Valley preparing Letter of Intent
- Potential Increase in Future Work
 - Increased number of iSTS conversions
 - “Mini-conversions” of early iSTS to Revision 3 (over 400 TSTFs since Rev. 0)
- Traditional Causes of Delays May Recur
 - Quality of Submittals
 - Delays in Licensee Responses to issues/RAIs
 - Beyond Scope Items/Deviations