

DC COOK TS CONVERSION LESSONS LEARNEDPre-Submittal

Problem: Loss of Control by NRR of maintaining the schedule of the Conversion Review

The licensee submits a TS conversion that contains BSIs and unapproved TSTFs (UTSTFs) already implemented into the TS; the licensee is assuming that the BSIs/UTSTFs are going to be approved before the conversion review begins, because they usually are. Through use of the BSIs/UTSTFs the licensee takes control of the schedule.

Solution: Develop Standard Format and Guidelines

The Standard Format restricts the BSIs/TSTFs that are incorporated in the original TS submittal to those BSIs/TSTFs that are not precedent setting by requiring the licensee to provide examples of other NRC approved applications that contain the BSI/TSTFs precedents. BSIs/TSTFs identified during the Acceptance Review as precedent setting will be reviewed in a parallel path outside the TS Conversion Review.

Bullet: TS Conversion submittal only contains non-precedent setting BSIs/TSTFs

Ground Rules

Problem: Communication Breakdown at Impass Issues

Staff and licensee representatives get bogged down in information exchanges during impass issues instead of addressing the problem.

Solution: TS Conversion Ground Rules

Compose ground rules that include recognizing past precedents, turn around times for RAIs, schedule commitments, BSI precedent/non-precedent setting, impass and differences resolution mechanisms, etc.

Bullet: Setup Conversion Review Ground Rules

Submittal

Problem: Loss of Control by NRR of the BSI Review

BSI Review is complicated and time consuming. PM should compose Green Sheets and obtain assigned BSI Reviewers when the TS Conversion is submitted..

Solution: Assign a primary PM at the beginning of the conversion review

PM must devote substantial effort at the beginning of the TS Conversion Review.

Bullet: From the Submittal involve the PM and BSI Reviewers in the review

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### Acceptance Review

Problem: Early Identification of BSI Problems

Solution: Involve BSI Reviewers in the Acceptance Review

BSI Reviewers identify early in the review the precedent setting BSIs and initiate the parallel review for these BSIs. The TS Conversion submittal is amended to remove precedent setting BSIs from the improved TS.

Bullet: Initiate the parallel review for the Precedent Setting BSIs during the Acceptance Review

### Acceptance Review/RAI Meetings

Problem: Turn around time for RAI responses is too long

Solution: A Panel composed of NRR staff and Licensee representatives 1 week after each face to face meeting to determine and document the causes of response delay.

Bullet: Appoint a Panel to provide solutions to RAI response delays.

### TS Conversion Review

Problem: Resources squandered on Instrumentation Review

NRC initial Instrumentation questions tended to be very narrow in scope then evolved in later rounds to specify information necessary to justify the licensee's proposed changes. This led to a rounds of instrumentation question using both staff and licensee resources.

Solution: Instrumentation Reviewers must focus their questions to involve only justification for the licensee's proposed changes. The reviewers initial questions must address the entire area of concern.

Bullet: Focus Instrumentation Review questions to address the licensee's justification for the proposed changes.

### Involvement of the Public

Problem: Further increase in the Public Involvement

If a webpage is to be used, the NRC staff needs to issue a letter early in the conversion review to improve the Public's notification of the webpage.

Solution: The webpage allows the public to see the questions and answers. To do this, it is recommended that the Sholly notice for the conversion be issued, early in the review, to the licensee and service list with an explanation of the webpage. This will make the service list, and the public via the FR notice, aware of the webpage and how to access it.

Bullet: Issue Sholly notice for the conversion early in the review