

ACCELERATED STS CONVERSION

- Purpose of This Presentation: Awareness of Initiative

Staff Lead: Pete Hearn, NRR/DIRS/ITSB, 2/06/2007

SUMMARY

- **Accelerate the traditional STS conversion review from 16/24 months to 8 months**
- ***DC Cook was pilot conversion: start date 4/12/2004***
- **Expectations: Pilot Program, was not a change in review process at the time**
- **Significant Potential for future STS Conversions and “mini Conversions” (conversion from early STS to STS Rev. 3)**

Background/History

- Pre-improved Standard Technical Specifications - 1979
NUREG-0123 (BWR5)
NUREG-0212 (CE)
NUREG-0452 (W)
- Standard Technical Specifications (STS)
 - Rev. 0 - September 1992
 - Rev. 1 - April 7, 1995
 - Rev. 2 - April 30, 2001
- Revisions incorporate generic changes to STS; nearly 500 TSTFs since STS Rev. 0
- STS, Rev. 3 - June 2004
STS, Rev. 3.1- December 2005

STS Conversion Status

- Plants implementing STS - 74
- Plants converted to STS with ARP - 5
 - DC Cook, 1&2
 - Beaver Valley, 1&2
 - Monticello
- Plants considering converting to STS - 30
- Plants not considering converting to STS - 0
(Note: There were 11 plants in this category until NRC initiated the pilot program for the accelerated review process)

GOALS

- Reduce conversion review time

<u>Current Process</u>	<u>Accelerated Review</u>
16/24 months	8 months (goal, NOT a metric!)

- Improved Predictability
 - Licensees plan funds 1-2 years in advance of submittal
 - Savings realized only upon implementation - Technical work begun 1 year prior to submittal; NRC reviews can take 12-24 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

- Eliminate 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

OTHER CONSIDERATIONS

- Traditional Causes of Delays May Recur
 - Quality of Submittals
 - Delays in Licensee Responses to issues/RAIs
 - Beyond Scope Items/Deviations