

**Improved Technical Specifications (ITS)  
Submittal  
Accelerated Licensing Review Process**

# Improved Technical Specifications (ITS) Submittal Accelerated Licensing Review Process

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# **Improved Technical Specifications (ITS) Submittal Accelerated Licensing Review Process**

## **Background**

Improved Technical Specification (ITS) conversion guidance, established in NEI 96-06, outlines the basic tasks and milestones that must be accomplished to support an ITS conversion. Attachment 1 of NEI 96-06 contains the NRC Recommended Conversion Application Guidelines.

Based on discussions with the NRC and the Industry, an accelerated 6 to 8 month NRC review process may be used for ITS submittals. This accelerated NRC review process will reduce licensee costs, NRC resources, and ultimately reduce the required amount of formal correspondence between the utility and the NRC from the initial ITS submittal to the final NRC issuance of the ITS Safety Evaluation Report (SER), including issuance of the approved ITS and Bases.

This document was developed using NEI 96-06 as the baseline for an ITS conversion and incorporates those details from both the initial pilot process and comments/lesson learned that were generated from both the Licensee and the NRC as a result of the first application of the accelerated review process. This process includes:

1. Description of the review process,
2. Documentation of questions and answers,
3. Review schedule and duration,
4. Review ground rules, and
5. Required level of engagement by the different organizations.

The overall process schedule requires review/evaluation from a dynamic perspective. As an example, during the period of the accelerated NRC review, ongoing events may necessitate change to the proposed ITS and Bases provided in the initial submittal, as well as the statements in the initial submittal providing technical justification for the proposed ITS and Bases. It is generally assumed that any of these events may impact the schedule associated with the accelerated review process and should be considered during the review of the process. These events include, but are not limited to, the following:

- Meetings and teleconferences with the NRC regarding the proposed ITS and Bases, including planned and emergent technical review and administrative meetings and teleconferences;
- Licensing correspondence between Licensee and the NRC regarding the ITS submittal, including NRC requests for additional information (RAIs), Licensee response to RAIs, and Licensee self-initiated supplements to the ITS submittal;
- Licensing correspondence between Licensee and the NRC regarding other issues that impact the ITS submittal and the NRC review and approval process, including potential Technical Specification changes on a planned or emergent basis;
- Plant configuration changes that impact the ITS submittal and the NRC review and approval process, including procedure changes, accident and safety analyses changes, engineering document changes, and physical modifications to the facility; and
- Implementation impacts identified during development of procedures and engineering documents, relocation of current Technical Specification requirements to other

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controlled documents such as the UFSAR, development and conduct of ITS specific training activities, and initial implementation of the proposed ITS requirements.

### **NRC Review Process**

The NRC review process will use the following as a baseline schedule. This baseline process includes public meetings, two sets of RAIs, associated responses and a single supplement prior issuance of the SER. The steps of the process are as follows:

1. Licensee submits ITS LAR (including preliminary Discussion of Change (DOC) Table),
2. Initial public meeting held at NRC Headquarters (Weeks 1-2),
3. NRC completes acceptance review and concurs with the proposed accelerated NRC review (Weeks 1-2),
4. NRC completes initial review and informally provides initial RAIs to Licensee (may be by ISTS Section) (Weeks 1-7),
5. Licensee completes review of informal RAIs, and submits informal responses (may be by ISTS Section) (Weeks 4-7),
6. Five day initial RAI public meeting held at NRC Headquarters (Week 8),
7. NRC reviews RAI response, identifies remaining issues, and issues final formal RAI(s)(not anticipated) (Weeks 9-10),
8. Licensee completes review of formal RAIs, and submits formal response(s)(not anticipated) (Weeks 9-12),
9. Three day final RAI public meeting held at NRC Headquarters(not anticipated) (Week 13),
10. NRC reviews RAI response, and issues meeting summary (Weeks 14-16),
11. NRC begins draft SER (Weeks 9-18),
12. Licensee submits ITS LAR supplement, final DOC Table, and clean ITS and Bases pages (Weeks 14-18),
13. NRC completes review of ITS LAR supplement, DOC Table, and ITS and Bases pages (Weeks 19-21),
14. NRC issues draft SER(Weeks 22-24),
15. Licensee completes review of draft SER(Weeks 25-26),
16. NRC completes preparation, review, and issuance of SER with final ITS and Bases (Weeks 27-31).

A schedule that reflects the steps of this process can be found in Attachment 1.

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## **Submittal**

When the ITS License Amendment Request is submitted to the NRC, it should be assembled/delivered in accordance with the guidelines established in NEI 96-06 with the following additional considerations/changes:

1. One entire paper copy of the License Amendment Request, the clean typed ITS Specifications and the clean typed ITS Bases,
2. 15 copies of the License Amendment Request on cd,
3. Each cd should include the pdf of the ITS License Amendment Request, the clean typed ITS Specifications and the clean typed ITS Bases and the DOC tables in Word.

## **Discussion of Change (DOC) Table**

A table will be created by the Licensee which lists each of the four major types of DOCs and collates them by various details. An example of each of the four major DOC tables can be found in ATTACHMENT 2.

## **Meetings and Teleconferences During NRC Review**

During the NRC review of the ITS submittal, it is anticipated that the following planned meetings and teleconferences would be held:

1. Initial Public Meeting

The primary purpose of this meeting is to establish ground rules for the ITS conversion review. In addition, the Licensee identified Beyond Scope Items (BSIs) will be explained/discussed for appropriate disposition. At this meeting training will be provided, as appropriate, to the NRC Project Manager, NRC Technical Specification Reviewers, and other NRC Discipline Technical Reviewers responsible for technical reviews, in the content and format of the ITS submittal, including how to navigate the electronic files. Other purposes of the meeting would be to describe to the NRC the development process used for the submittal, and to reach agreement regarding acceptable methods of informal and formal communications to be used during the review process. Based on the subject matter and expected attendance level by the NRC, it is recommended that the three ITS Project Team representatives would be the ITS Project Manager, ITS Project Licensing Team Member, and EXCEL ITS Project Development Team Member.

2. Technical Review Meetings

Two technical review meetings are anticipated to be held at NRC Headquarters in order to facilitate resolution of either informal or formal RAIs. At both meetings, the four Licensee ITS Project Team representatives may be required. The first meeting is anticipated to be a five day meeting, primarily to discuss all initial NRC informal or formal RAIs to ensure common understanding of open issues, and to allow the ITS Project Team to respond to and close out as many of these open issues as possible. To make effective use of NRC resources, the meeting will be scheduled such that

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appropriate NRC personnel need only attend during these times designated to review and resolve issues associated with the ITS sections or BSI issues for which they have primary responsibility.

The second meeting is not anticipated, but if necessary, would be a three day meeting, primarily to discuss resolution of issues remaining from the first meeting, and to again allow the ITS Project Team to respond to and close out as many of these open issues as possible. This meeting will be scheduled in a manner similar to the five day meeting.

Based on the subject matter and expected attendance level by the NRC, it is recommended that the four ITS Project Team representatives would be the ITS Project Operations Team Member, ITS Project Engineering Team Member, ITS Project Licensing Team Member, and EXCEL ITS Project Development Team Member. Support from the rest of the ITS Project Team and other commitment empowered Licensee staff would be required by telephone during these meetings. It is recommended that a Licensing Engineer be a primary point of contact between ITS Project Team representatives at NRC Headquarters and the rest of the support staff, assisted by the ITS Project Manager, ITS Project Maintenance Team Member, and any EXCEL ITS Project Team Members located at the Licensee office.

### **Licensing Correspondence and Communications Regarding the ITS Submittal**

#### **1. License Amendment Request Supplement**

A cycle of informal RAIs will require response during the NRC review of the ITS submittal. In addition to the possibility of a formal response to either verbal or written RAIs, it is anticipated that at least one planned supplement will be required prior to approval of the proposed ITS and Bases. This submittal would be provided following resolution of all verbal and written RAIs and before issuance of the draft SER.

#### **2. Request for Additional information**

During the NRC review of the ITS submittal, it is anticipated that there will be a need to submit additional information to the NRC to facilitate the review and the approval of the proposed ITS and Bases. This information includes formal correspondence as well as informal submission of information in response to anticipated as well as emergent NRC verbal or written RAIs, as well as self-initiated correspondence either as a planned supplement or in response to self-identified emergent issues from either internal or external sources affecting the content of the ITS submittal. Formal correspondence will be developed and processed in accordance with the current Nuclear Regulatory Affairs procedures. Informal submission of information will be channeled through the Nuclear Licensing Supervisor, also in accordance with the current Nuclear Regulatory Affairs procedures.

#### **3. Self Initiated Correspondence**

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The Licensee self-initiated correspondence in response to self-identified issues from either internal or external sources affecting the content of the ITS submittal would include changes created by licensing correspondence regarding other issues, plant configuration changes, and implementation impacts as further described in the sections below.

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### 4. Current Technical Specification Issues

During the NRC review of the ITS submittal, it is anticipated that other licensing correspondence will be submitted to the NRC potentially affecting the contents of the ITS submittal. In addition, the NRC may formally approve requested changes to the current Technical Specifications, or may issue other correspondence that also affects the contents of the ITS submittal.

In order to quickly identify and respond to these possibilities, the ITS Project Licensing Team Member should participate in planned communications meetings conducted by the Nuclear Regulatory Affairs Department, as well as direct communications with the NRC regarding proposed submittals and/or pending approvals of requested changes to the current licensing basis. If actions are identified through these contacts that require further evaluation or tracking by the ITS Project Team, then appropriate ITS Project Licensing Open Items shall be created to track resolution.

### 5. Emergent Issues and Related Communications

In addition to planned meetings and teleconferences, there is the potential for emergent issues to necessitate other teleconferences both internally and with the NRC. If these emergent issues arise, it is essential that the ITS Project Team Core Members and appropriate Nuclear Regulatory Affairs personnel participate in the communications process with the NRC.

All planned and emergent teleconferences will be documented internally by memorandum, with a minimum distribution to the ITS Project Team and to Nuclear Regulatory Affairs, and to all participants or other persons providing significant information exchanged with the NRC during the meeting or teleconference. Teleconferences shall be conducted in accordance with the current Nuclear Regulatory Affairs procedures governing written and verbal communications with the NRC. If actions are required to resolve open issues arising from the meeting or teleconference, then appropriate ITS Project Licensing Open Items shall be created to track resolution.

### **ITS Project Licensing Question/Answer Database**

All formal or informal issues will be tracked in an on line database. This database will be maintained by the Licensee from the start of the Licensing process thru issuance of the SER. The purpose of this database is to positively track issues to closure. Establishment of ownership and schedule expectations with respect to open items will support both timely issue resolution/closure and the accelerated review process schedule.

An example of both the database question and the answer fields and entry requirements/instructions can found in Attachment 3.

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It is essential to the success of the accelerated licensing process that both the data entry methods and the data itself be entered in a consistent manner. A lesson learned, during the performance of the pilot process, has shown that periodic database training/guidance on database entry will be useful for both the NRC review team and the Licensee. Therefore, in addition to the team training during the initial public meeting, a help window in the database is available, for both NRC Questions and the Licensee Answers, to use as an online guide. This online guide is a template which establishes minimum expectations for consistent data entry.

### **ITS Conversion Ground Rules**

ITS Conversion Ground Rules need to be established to provide a baseline for efficient negotiations between the NRC and Licensee and also to capture the lessons learned from previous efforts.

Each ITS Conversion Licensee Project Manager and the NRC TS Section Project Manager should endorse a contract/letter/memo of understanding to formally document expectations associated with BSI's, schedule milestones, review time, process, definitions, training, etc. The following list of expectations/lessons learned should be considered when creating a working agreement between the NRC and the Licensee:

1. Review Times for RAI's- A reasonable time expectation for posting/answering/closing questions in the database should be agreed upon. This should include details associated with:
  - a. An acceptable response time by the licensee,
  - b. An acceptable response review time by the NRC,
  - c. The expectation on timely closure for those questions that are responded to satisfactorily,
  - d. For those questions that require additional information from the licensee, the expectation on review and response should also be considered,
  - e. Precedence- Past precedence/repeatability should be considered when establishing expectations on review times and effort.

For those responses or closure resolutions that are taking too long, based on the previously agreed upon guidelines, an issue resolution panel should be engaged. The panel, consisting of NRR and Licensee personnel, should provide solutions/success paths for RAI response delays.

2. BSI Definition- Changes which are in addition to the direct conversion of CTS to ITS have been labeled "Beyond Scope Issues." The current guidance on defining a "BSI" can be found in NEI 96-06. It describes potential "beyond scope" or licensing basis changes as those that are both different than the CTS and different than the ISTS.

NEI 96-06 also provides guidance on the acceptability of including beyond scope issues in the conversion. It supports that those changes which are in addition to the direct conversion of the CTS to the ITS but which may be included within the scope of an ITS conversion application include incorporation of Generic Letter line item improvements (including extending surveillance frequencies

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to 24 months in accordance with Generic Letter 91-04), incorporation of generically approved topical reports, AOT-STI for BWRs, and generically approved risk based changes.

Changes which are considered beyond the scope of an ITS conversion application, and therefore may result in delays in the review and approval of the application, include plant-specific risk based changes, and power uprate.

It is appropriate for NRC ISTS Section reviewers to obtain additional help when required including concurrence from other NRR Sections and Branches, however, the responsibility for issue identification and closure should remain in the NRC ISTS Section. A mutual understanding, of the beyond scope concept, is required by both the Licensee and NRC to ensure the correct identification of beyond scope issues and the ultimate removal of ISTS section responsibility for the issue in question.

3. BSI Schedule Impact- When a licensee submits an ITS conversion that includes precedent setting BSI's or unapproved TSTF's, the licensee assumes they will be approved and as a result the BSI's and/or TSTF's control the schedule. Previously established conversion guidance permits only those BSI's and TSTF's that are not precedent setting to be incorporated into the conversion. Therefore, during the acceptance review and/or initial public meeting, an effort should be made to identify any precedent setting changes incorporated in the license amendment. Those identified during the review as precedent setting should be removed from the conversion and reviewed in a parallel path outside of the ITS Conversion review. Each BSI element should receive individual schedule milestones that support the ITS conversion schedule milestones for completion.
4. BSI Reviewers- A BSI review can be very complicated and time consuming. An NRC BSI Project Manager and BSI technical reviewers should be assigned and made part of the NRC review team during the initial public meeting. They should be trained with the team during the initial review and be informed of the precedent/non-precedent discussions. The BSI review and the conversion review need to track parallel paths for a timely completion for the entire license amendment review.
5. BSI Communication/Expectations- During the informal RAI process supporting BSI issues, the issue resolution process may stall due to poor communication/information exchange. As a result, the original issue is sometimes lost or misunderstood. It is important that the Q&A process maintains a keen focus on identified issues through out the issue resolution process.
6. BSI Reviewer Questions- Reviewers questions should fully describe the potential issue/concern and stay within the scope of the conversion. Submitted questions sometimes tend to be very narrow in scope which leads to many rounds of additional questions to fully address the potential issue/concern. This often results in many questions and answers that result in a gradual loss of focus on the original issues/concerns. As a result, resource time is not used as efficiently as possible in reviewing and approving the licensee's justification for the proposed changes.

A recommendation, especially for the less experienced reviewers, is that questions be screened by a more senior reviewer prior to being placed on the web page. An alternative to

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this would be for the NRC ISTS Section or BSI Project Manager to review all questions prior to being placed on the web page. This has an added benefit in that, the NRC Project Manager can ensure consistency in meeting expectations of question quality/detail and at the same time stay very informed of issues as they are developing.

7. More Restrictive Changes- Consistent application of requirements/justification to include more restrictive changes in an ITS Conversion is required. Inconsistent application of requirements to adopt more restrictive changes has been experienced in recent conversions. This inconsistency has resulted in an inefficient use of resources and tends to shift the focus from more important justifications to proposed changes that could very well be optional for the licensee.
  
8. Removal Of Brackets-NEI 01-03, Writers Guide for the Improved Technical Specifications, provides guidance for removal of bracketed items in the ISTS. There has been an inconsistent level of detail required to justify the removal of brackets and the replacement of information inside the brackets. Licensee and NRC Project Management need to agree on specific acceptable criteria for bracket removal and information replacement.

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**Attachment 1- Schedule**

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**Attachment 2-DOC Table Examples**

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### A- Administrative Change

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.1.1	3/4.3.3.1, 2.2.1

### M- More Restrictive Change

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.1 M.1	CTS 3.2.2 and CTS 3.2.6 do not contain an Action to follow if the provided Actions are not followed. Therefore, CTS 3.0.3 would be entered which would require the plant to be in MODE 2 within 7 hours. ITS 3.2.1 ACTION B states that when the Required Action and associated Completion Time is not met, the plant must be in MODE 2 within 6 hours. This changes the CTS by providing 6 hours instead of 7 hours to be in MODE 2.	3.2.1 ACTION B	3.2.2, 3.2.6, 3.0.3

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### L- Less Restrictive Change

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.1 L.1	CTS 3.2.5 Action requires the unit to reduce THERMAL POWER to < 5% of RTP within the next 4 hours if the DNB parameters are not restored to within limit in 2 hours. ITS 3.4.1 ACTION B requires the power reduction to $\leq$ 5% RTP (MODE 2) within the next 6 hours if the DNB parameters are not restored to within limit in 2 hours. This changes the CTS by extending the time for the unit to be placed outside the MODE of Applicability. The change which allows the THERMAL POWER reduction to be only to 5% RTP is discussed in DOC A.2.	3.4.1 ACTION B	3.2.5 Action	3

#### Change Categories:

- 1 - Relaxation of LCO Requirements
- 2 - Relaxation of Applicability
- 3 - Relaxation of Completion Time
- 4 - Relaxation of Required Action
- 5 - Deletion of Surveillance Requirement
- 6 - Relaxation of Surveillance Requirement Acceptance Criteria
- 7 - Relaxation of Surveillance Frequency, Non-24 Month Type Change
- 8 - Deletion of Reporting Requirements
- 9 - Surveillance Frequency Change using GL 91-04 Guidelines, non-24 Month Type Change
- 10 - 18 to 24 Month Surveillance Frequency Change, Non-Channel Calibration Type
- 11 - 18 to 24 Month Surveillance Frequency Change, Channel Calibration Type
- 12 - Deletion of Surveillance Requirement Shutdown Performance Requirements
- 13 - Addition of LCO 3.0.4 Exception
- 14 - Changing Instrumentation Allowable Values

Note 1 - Certain Less Restrictive Changes for Section 3.4 did not fall into any of the categories listed above. A Specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change (annotated above by the use of "N/A") in Section 3.4.

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### LA and R – Removed Details and Relocated Specifications

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.13 LA.1	Table 3.6-2	CTS Table 3.6-2 specifies the divider seal acceptable physical properties. The table includes the tensile strength and elongation property as well as the material type. The material must be Uniroyal 3807 or equal, defined as meeting at least the requirements discussed in Question 5.98 of the Plant's FSAR. ITS SR 3.6.13.4 only includes the tensile strength and elongation property requirements. This changes the CTS by moving the material type to the UFSAR.	UFSAR	10 CFR 50.59	1
3/4.6.5.2 R.1	3/4.6.5.2	CTS 3/4.6.5.2 provides requirements on the Ice Bed Temperature Monitoring System. The Ice Bed Temperature Monitoring System monitors the temperature of the ice bed to ensure that the ice bed temperature does not increase above the required limits undetected. However, the Ice Bed Temperature Monitoring System is not required to ensure the ice bed temperature is maintained within limits. Another Technical Specification (that is being retained) will continue to ensure that temperature is maintained within the required limits. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	N/A

Change Types (only applicable to LA DOCs):

- 1 - Removing Details of System Design and System Description, including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
- 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
- 5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the COLR
- 6 - Removal of LCO, SR, or other TS Requirement to the TRM, UFSAR, ODCM, QAPD, or IIP

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**Attachment 3-Licensing Open Item Database Desktop Guide**

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### **NRC Reviewer Input:**

- **ID:** Auto populated number. This number is assigned when the NRC Reviewer signs in and adds a new question, and is based on the year, month, day, and time that the new question is originally saved. No additional action is required.
- **Conference Call Requested:** Check the box if you wish to have a conference call with the Licensee.
- **Category:** Select the Category of the question. This is a dropdown menu. Simply move the mouse to the desired Category description and left mouse click once and this will select the Category.
- **ITS Section:** Select the Section that you are reviewing. This is a dropdown menu. Simply move the mouse to the desired number and left mouse click once and this will select the number. This field only allows one ITS Section to be entered at this time. Therefore, if more than one ITS Section is affected, then enter all affected ITS Sections in the Comments field.
- **ITS Number:** Select the specific section that you are reviewing. This is a dropdown menu. Simply move the mouse to the desired number and left mouse click once and this will select the number. This field only allows one ITS Number to be entered at this time. Therefore, if more than one ITS Number is affected, then enter all affected ITS Numbers in the Comments field.
- **DOC Number:** Select the proper Discussion of Change (DOC) number that the question is about. If the question does not pertain to a DOC Number, select None from the menu. This is a dropdown menu. Simply move the mouse to the desired number and left mouse click once and this will select the number. This field only allows one DOC Number to be entered at this time. Therefore, if more than one DOC Number is affected, then enter all affected DOC Numbers in the Comments field.
- **JFD Number:** Select the proper Justification for Deviation (JFD) number that the question is about. If the question does not pertain to a JFD Number, select None from the menu. This is a dropdown menu. Simply move the mouse to the desired number and left mouse click once and this will select the number. This field only allows one JFD Number to be entered at this time. Therefore, if more than one JFD Number is affected, then enter all affected JFD Numbers in the Comments field.
- **JFD Bases Number:** Select the proper JFD Bases number that the question is about. If the question does not pertain to a JFD Bases Number, select None from the menu. This is a dropdown menu. Simply move the mouse to the desired number and left mouse click once and this will select the number. This field only allows one JFD Bases Number to be entered at this time. Therefore, if more than one JFD Bases Number is affected, then enter all affected JFD Bases Numbers in the Comments field.
- **Page Number(s):** Enter the page number that is stamped at the top or bottom of the page. (Example: Volume 3, Attachment 1, Revision 3, Page X of Y. You would enter X for the page number.) This field only allows one Page Number to be entered at this time. Therefore, if more than one page is affected, then enter all affected Page Numbers in the Comments field.
- **NRC Owner:** Auto populated Name. This is the name of the NRC Reviewer and is assigned when the NRC Reviewer signs in and adds a new question. Only the NRC Reviewers and the Licensee can see the NRC Owner name. No additional action is required.
- **Comment:** Enter the information in as much detail as needed. If the text gets lengthy then prepare an appropriate document to attach. Also, any electronic file(s) may be added to the question if required. To add an electronic file, left mouse click once on the "Browse..." button in the comment section to select and add the file(s). Be aware that certain word-processing symbols may not correctly appear in the database if cut and pasted from other programs, including such things as "smart" quotes and apostrophes, and formatting items such as hard returns, page breaks, hard spaces, etc. will also not appear correctly. In addition, font formatting will be lost if cut and pasted from a word-processed document, including bold, colors, and underline. Therefore, spell out symbols and other items when necessary. To verify

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correct formatting, save the question and then reopen the question, and edit if necessary to correct formatting errors. In this case, if the question is edited immediately after the initial save it is not necessary to notify the Licensee (see Note below on editing questions).

- **Issue Date:** Enter the date. If you double click with the left mouse, it will enter the day's date.
- **Save:** When all the necessary information has been added, move the mouse to the top of the screen over top of the save button and left mouse click once.
- **Cancel:** When it is determined that the question is not required, move the mouse to the top of the screen over top of the cancel button and left mouse click once.

Note: The above instructions also apply when editing a question. However, it is necessary to inform the licensee whenever a question is edited to prevent confusion. If editing of an original question is necessary, then it is recommended that a new NRC Reviewer follow up comment be added to the original question. **DO NOT** edit the original question or other NRC Reviewer follow up comments unless agreed to by the Licensee to prevent confusion. The Licensee and others cannot determine with certainty if, when, or how an original question, NRC Reviewer follow up comment, or Licensee comment has been edited.

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### **Licensee Comments:**

- **ID Number:** Auto populated number. This number was assigned when the NRC Reviewer originally signed in and added the original question, and is based on the year, month, day, and time (hour and minute) that the new question was originally saved.
- **Response By:** Auto populated Name. This is the name of the Licensee Reviewer and is assigned when the Licensee Reviewer signs in and begins to answer a question. Only the NRC Reviewers and the Licensee can see the Response By name. No additional action is required.
- **Licensee Assigned:** Identify the person who needs to supply the response.
- **Date Assigned:** Enter the date. If you double click with the left mouse, it will enter the current date.
- **Response Submitted:** Enter the date. If you double click with the left mouse, it will enter the current date.
- **Comment:** Enter the information in as much detail as needed. If the text gets lengthy then prepare an appropriate document to attach. Also, any electronic file(s) may be added to the comment if required. To add an electronic file, left mouse click once on the "Browse..." button in the comment section to select and add the file(s). Be aware that certain word-processing symbols may not correctly appear in the database if cut and pasted from other programs, including such things as "smart" quotes and apostrophes, and formatting items such as hard returns, page breaks, hard spaces, etc. will also not appear correctly. In addition, font formatting will be lost if cut and pasted from a word-processed document, including bold, colors, and underline. Therefore, spell out symbols and other items when necessary. To verify correct formatting, save the comment and then reopen the comment, and edit if necessary to correct formatting errors. In this case, if the comment is edited immediately after the initial save it is not necessary to notify the Licensee (see Note below on editing Licensee comments).
- **Validation:** Click the box if validation of any technical information or statement of fact in the comment is required.
- **Save:** When all the necessary information has been added, move the mouse to the top of the screen over top of the save button and left mouse click once.
- **Cancel:** When it is determined that the follow up comment is not required, move the mouse to the top of the screen over top of the cancel button and left mouse click once.

Note: The above instructions also apply when editing a Licensee comment. However, it is necessary to inform the NRC Reviewer and/or NRC Project Manager whenever a Licensee comment is edited to prevent confusion. If editing of an original Licensee comment is necessary, then it is recommended that a new Licensee comment be added to the original question. DO NOT edit the original question or other Licensee comments unless agreed to by the NRC Reviewer and/or NRC Project Manager to prevent confusion. The NRC Reviewer and/or NRC Project Manager and others cannot determine with certainty if, when, or how an original question, NRC Reviewer follow up comment, or Licensee comment has been edited.

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### **NRC Reviewer Follow up Comments:**

- **ID Number:** Auto populated number. This number was assigned when the NRC Reviewer originally signed in and added the original question, and is based on the year, month, day, and time (hour and minute) that the new question was originally saved.
- **Date:** Enter the date. If you double click with the left mouse, it will enter the current date.
- **Response By:** Auto populated Name. This is the name of the NRC Reviewer and is assigned when the NRC Reviewer signs in and begins to provide a comment. Only the NRC Reviewers and the Licensee can see the Response By name. No additional action is required.
- **Comment:** Enter the information in as much detail as needed. If the text gets lengthy then prepare an appropriate document to attach. Also, any electronic file(s) may be added to the comment if required. To add an electronic file, left mouse click once on the "Browse..." button in the comment section to select and add the file(s). Be aware that certain word-processing symbols may not correctly appear in the database if cut and pasted from other programs, including such things as "smart" quotes and apostrophes, and formatting items such as hard returns, page breaks, hard spaces, etc. will also not appear correctly. In addition, font formatting will be lost if cut and pasted from a word-processed document, including bold, colors, and underline. Therefore, spell out symbols and other items when necessary. To verify correct formatting, save the comment and then reopen the comment, and edit if necessary to correct formatting errors. In this case, if the comment is edited immediately after the initial save it is not necessary to notify the Licensee (see Note below on editing NRC Reviewer follow up comments).
- **Save:** When all the necessary information has been added, move the mouse to the top of the screen over top of the save button and left mouse click once.
- **Cancel:** When it is determined that the follow up comment is not required, move the mouse to the top of the screen over top of the cancel button and left mouse click once.

Note: The above instructions also apply when editing a NRC Reviewer follow up comment. However, it is necessary to inform the licensee whenever a NRC Reviewer follow up comment is edited to prevent confusion. If editing of an original NRC Reviewer follow up comment is necessary, then it is recommended that a new NRC Reviewer follow up comment be added to the original question. **DO NOT** edit the original question or other NRC Reviewer follow up comments unless agreed to by the Licensee to prevent confusion. The Licensee and others cannot determine with certainty if, when, or how an original question, NRC Reviewer follow up comment, or Licensee comment has been edited.

## **Improved Technical Specifications (ITS) Submittal Accelerated Licensing Review Process**

### **NRC Reviewer Comment Acceptance:**

When the Licensee's response is acceptable, then perform the following:

- **Close Date:** Enter the date. If you double click with the left mouse, it will enter the current date.
- **CTS Markup:** Click the box if the Licensee has committed to change the CTS Markup Page(s) of the ITS Submittal.
- **NUREG Bases Markup:** Click the box if the Licensee has committed to change the NUREG Markup Page(s) of the ITS Submittal.
- **Typed ITS Bases:** Click the box if the Licensee has committed to change the final Typed ITS Bases Page(s).
- **DOC:** Click the box if the Licensee has committed to change the DOC(s) of the ITS Submittal.
- **Bases JFD:** Click the box if the Licensee has committed to change the Bases JFD(s) of the ITS Submittal.
- **Formal RAI Required:** Click the box if a Docketed RAI Response from the Licensee is required.
- **NUREG Markup:** Click the box if the Licensee has committed to change the NUREG Markup Page(s) of the ITS Submittal.
- **NSHC:** Click the box if the Licensee has committed to change the Generic or Specific NSHC(s) of the ITS Submittal.
- **None:** Click the box if the Licensee has not committed to change the ITS Submittal (i.e., the question may be closed with no further actions required).
- **JFD:** Click the box if the Licensee has committed to change the JFD(s) of the ITS Submittal.
- **Typed ITS:** Click the box if the Licensee has committed to change the final Typed ITS Page(s).
- **Other:** Click the box if the Licensee has committed to a change that is not listed.
- **Docket Response Required:** Click the box if the Licensee has committed to a Docketed Response, including revisions to the original ITS Submittal as noted in the other boxes.
- **Save:** When all the necessary information has been added, move the mouse to the top of the screen over top of the save button and left mouse click once.
- **Cancel:** When it is determined that the response is not required, move the mouse to the top of the screen over top of the cancel button and left mouse click once.

**NOTE:** Multiple boxes may be checked. Check all that are required.

NOTE: If an additional comment is desired upon closing the question, then it is recommended that a new NRC Reviewer follow up comment be added to the original question prior to closing the question. DO NOT edit the original question or other NRC Reviewer follow up comments to prevent confusion. The Licensee and others cannot determine with certainty if, when, or how an original question, NRC Reviewer follow up comment, or Licensee comment has been edited.