

## **Project Plan**

1. Objectives
  - a. Industry Guidelines
  - b. Companion to NRC Guidelines
  - c. Cross-Reference to other NRC and NEI Guidelines
  - d. Identify NRC and NEI Management Sponsors
2. Scope (options)
  - a. License Amendment Requests (10 CFR 50.90)
  - b. Relief Requests
  - c. Exemptions
  - d. Emergency/Exigent Tech Spec changes
  - e. 50.54 plan changes
  - f. Other actions that involve NRC approval
  - g. License Amendments vs. Licensing Actions
3. Deliverables
  - a. NEI-06-02 Rev 1
  - b. Others?
4. Assignments
  - a. Pending telecon/meeting in January 2008
  - b. Team members screen NEI 06-02 to identify terms to define (1/8/08)
5. Schedule
  - a. General process (NEI produce next rev by July 2008)
    - i. TEAM concurrency
    - ii. LATF Steering Group concurrence
    - iii. Peer Review – Licensing Contacts List
  - b. Next TEAM meeting ~ January 31
  - c. Tentative milestones
    - i. 12/11/07 – TEAM start date
    - ii. 06/30/08 – TEAM draft
    - iii. 07/31/08 – LATF Steering Group draft
    - iv. 09/30/08 – Peer Review complete
    - v. 10/06/08 – Discuss peer review at NEI Licensing Forum in October
    - vi. November/December – Submit to NRC for endorsement

## **Terms and Definitions**

1. Precedent
2. Rejection (i.e., content is missing or inadequate)
3. Denial (i.e., technical disagreement)
4. Current Licensing Basis
5. FOAK (first of a kind)
6. Generic
7. Commitment
8. Tech Spec Task Force (TSTF) Traveler
  - a. Regular Traveler
  - b. "A" Traveler
  - c. "T" Traveler
9. CLIIP
10. ACRONYM use
11. TEAM is reviewing NEI 06-02 Revision 0 to identify other terms

**LAR Quality**

1. RAI Response Template
2. Reference NEI Tech Spec writer's guide
3. Roadmap to details (FSAR, Design Basis, Regulations, Standards, etc.)
4. Identify underlying regulatory requirements
5. Strive for a stand-alone document
6. User friendly format
7. Specify the NRC actions the licensee believes are necessary for approval
8. Style Manual
9. Develop acceptance criteria

## **Precedent**

1. Difficult to find older CLB information for other plants. No public database.
2. Existing documentation is published without identifying its potential use as precedent.
3. No criteria for what might be applicable as precedent.
4. Consider possibility of a website database of accepted precedent.
5. Establish a framework for precedent boundary conditions, i.e., what a licensee must do to verify that precedent applies
6. Establish an expectation within NRC that reviewers will accept documents that have been identified as precedent.
7. Develop a process for capturing RAIs and documenting them for use as precedent
8. Treat approved TSTF travelers as firm precedent.
9. Include Topical Reports in the precedent process.

## **Issues**

1. NRC Licensing Metrics influence the course of LAR reviews
2. Changing NRC reviewers
3. New NRC reviewers
4. NRC reviewers raise the bar from one LAR to next "identical" LAR
5. No framework for verifying when an LAR is similar enough to another LAR to use it as precedent
6. No detailed "Reviewer Standard" on the use of precedent
7. No detailed "Reviewer Standard" on the RAI process
8. Inconsistent treatment of BASES changes during reviews
9. Industry perceives a diminished role for the NRC Project Manager
10. Regulatory Issue Screening Process – relationship to LARs
11. Non-acceptance of approved TSTF Travelers
12. Inconsistent NRC treatment of TSTF Travelers
  - a. Must implement a draft Traveler (e.g., TSTF-493)
  - b. Not accepting an approved Traveler (e.g., EDG Surveillance]
13. Calculations – Reviewer ask for too much detail
14. Reviewers trending toward design reviews rather than licensing reviews
15. No burden of proof on NRC reviewers