Amendment Requests

- GDC 4 Applies as outlined in the paper.
- If 50.59 criteria (method of evaluation) is met by only changing input parameters, license amendment is not required.
- Need to understand why NRC believes "method" changes.
- Process: LAR not required to determine Operability IAW Part 9900

Enforcement

- Action: CA Program, Confirm Operability, 50.59/LAR as applicable – no further enforcement for plants that have already done the overlay.
- Complete overlay, evaluation, OD, 50.59, Timely LAR for plants that do the overlay. What is "timely"?