

# ORDER FOR SUPPLIES OR SERVICES

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1 12

**IMPORTANT: Mark all packages and papers with contract and/or order numbers.**

BPA NO. NRC-HQ-12-A-03-0006

1. DATE OF ORDER <b>JUN 16 2013</b>	2. CONTRACT NO. (if any) GS10F0160J	6. SHIP TO:
3. ORDER NO. NRC-T002	4. REQUISITION/REFERENCE NO. NRR-13-242 FSS:132447 NRR-13-154 FSS:131733	a. NAME OF CONSIGNEE U.S. Nuclear Regulatory Commission

5. ISSUING OFFICE (Address correspondence to) U.S. Nuclear Regulatory Commission Div. of Contracts Attn: Morie Gunter-Henderson Mail Stop: TWB-01-B10M Washington, DC 20555		
7. TO:	f. SHIP VIA	b. STREET ADDRESS
c. CITY Washington		d. STATE DC
e. ZIP CODE 20555		

a. NAME OF CONTRACTOR ECOLOGY AND ENVIRONMENT, INC.	DUNS: 037761004
8. TYPE OF ORDER	

b. COMPANY NAME	<input type="checkbox"/> a. PURCHASE <input type="checkbox"/> b. DELIVERY REFERENCE YOUR      Except for billing instructions on the reverse, this Please furnish the following on the terms and      delivery order is subject to instructions conditions specified on both sides of this order      contained on this side only of this form and is and on the attached sheet, if any, including      issued subject to the terms and conditions delivery as indicated.      of the above-numbered contract.
c. STREET ADDRESS 1501 LEE HWY STE 306	
d. CITY ARLINGTON	e. STATE VA
	f. ZIP CODE 222091912

9. ACCOUNTING AND APPROPRIATION DATA 20-11-4-148 J4705 252A 31X0200 OBLIGATE: \$10,000.00 Contractor DUNS: 037761004 FFS: 132447 PSC:F114	10. REQUISITIONING OFFICE NRR
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11. BUSINESS CLASSIFICATION (Check appropriate box(es)) <input type="checkbox"/> a. SMALL <input checked="" type="checkbox"/> b. OTHER THAN SMALL <input type="checkbox"/> c. DISADVANTAGED <input type="checkbox"/> d. WOMEN-OWNED <input type="checkbox"/> e. HUBZone <input type="checkbox"/> f. SERVICE-DISABLED VETERAN-OWNED <input type="checkbox"/> g. WOMEN-OWNED SMALL BUSINESS (WOSB) ELIGIBLE UNDER THE WOSB PROGRAM <input type="checkbox"/> h. EDWOSB	12. F.O.B. POINT
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13. PLACE OF	14. GOVERNMENT BAL. NO.	15. DELIVER TO F.O.B. POINT ON OR BEFORE (Date)	16. DISCOUNT TERMS
a. INSPECTION	b. ACCEPTANCE		

17. SCHEDULE (See reverse for Rejections)

ITEM NO. (a)	SUPPLIES OR SERVICES (b)	QUANTITY ORDERED (c)	UNIT (d)	UNIT PRICE (e)	AMOUNT (f)	QUANTITY ACCEPTED (g)
	Task Order No.1 entitled "Technical Assistance for Environmental Reviews of the License Renewal Application for Braidwood Generation Station, Units 1 and 2"  The issuance of this task order does not amend any other terms and conditions of the subject contract.  Period of Performance: Date of Award - September 30, 2015 Total Order Ceiling Amount: \$161,479.00 Total Obligated Amount: \$10,000.00  COR: Kevin Folk 301-415-6944; Kevin.Folk@nrc.gov					

18. SHIPPING POINT	19. GROSS SHIPPING WEIGHT	20. INVOICE NO.	
21. MAIL INVOICE TO:			
b. NAME Department of Interior / NBC NRCPayments@nbc.gov			17(h) TOTAL (Cont. pages)
b. STREET ADDRESS (or P.O. Box) Attn: Fiscal Services Branch - D2770 7301 W. Mansfield Avenue			
c. CITY Denver	d. STATE CO	e. ZIP CODE 80235-2230	17(i) GRAND TOTAL
			\$10,000.00

22. UNITED STATES OF AMERICA BY (Signature) 	23. NAME (Typed) Morie Gunter-Henderson Contracting Officer TITLE: CONTRACTING/ORDERING OFFICER
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TEMPLATE - ADM001

SUNSI REVIEW COMPLETE

JUN 17 2013

ADM002

## STATEMENT OF WORK

### 1. PROJECT TITLE:

Technical Assistance for the Environmental Review of the License Renewal Application for the Braidwood Generation Station, Units 1 and 2.

#### 1.0 BACKGROUND

The U.S. Nuclear Regulatory Commission's (NRC) Office of Nuclear Reactor Regulation (NRR) is responsible for ensuring the public health and safety through licensing and inspection activities at all commercial nuclear power reactor facilities in the United States. Whereas NRC's primary mandate of protecting public health and safety is governed by the Atomic Energy Act, the mission of protecting the environment is established under numerous legislative initiatives. These include the National Environmental Policy Act (NEPA), the Endangered Species Act, the Clean Water Act, National Historic Preservation Act, Coastal Zone Management Act, and several other laws. NRC's environmental regulations for implementing NEPA are contained in Title 10 of the *Code of Federal Regulations*, Part 51 (10 CFR Part 51). Complying with NEPA is an NRC obligation.

In December 2012, the NRC approved a revision to its environmental protection regulation, 10 CFR Part 51, governing environmental impact reviews of nuclear power plant operating license renewals. The NRC, through its rulemaking process, has completed an update and re-evaluation of the potential environmental impacts associated with the renewal of an operating license for a nuclear power reactor for an additional 20 years. This update is documented in NRC's revised NUREG-1437, "Generic Environmental Impact Statement for License Renewal" (GEIS) (publication pending), which updates the 1996 GEIS and otherwise provides the technical basis for the final rule. The revised GEIS specifically supports the revised list of NEPA issues and associated environmental impact findings for license renewal contained in Table B-1 in Appendix B to Subpart A of 10 CFR Part 51. The final rule identifies 78 environmental impact issues, of which 17 will require plant-specific analysis. A revised Table B-1 will be included in 10 CFR Part 51, when published. As a result of the affirmation of the final rule by the Commission, the NRC must now consider the new Category 1 and 2 issues during its license renewal environmental reviews.

Under NEPA and NRC's implementing regulations in 10 CFR Part 51, the NRC must consider and analyze the potential significant impacts of its actions upon the human environment. The NRC imposes requirements on its regulated community to provide environmental information as part of a license renewal application (LRA). The NRC staff is actively engaged in reviewing LRAs for existing nuclear power plants. Some of the main activities involve:

- a. Reviewing LRAs, including environmental reports (ERs) submitted by applicants (i.e., the owner/operator of a nuclear power plant);
- b. Participating in site visits to conduct environmental reviews of documents and infrastructure and to interview applicant personnel;
- c. Preparing plant-specific Supplemental Environmental Impact Statements (SEISs) to NUREG-1437, "Generic Environmental Impact Statement for License Renewal" (Volumes 1 and 2, May 1996, referred to as the GEIS, as revised [Revision 1, publication pending] for operating reactor LRAs;

- d. Conducting public meetings before and after draft SEISs are published to obtain and respond to public scoping comments and comments on the drafts; and
- e. Binning public comments, preparing responses, and finalizing the SEISs.

The NRC regulatory guidance used as a basis for review of license renewal environmental issues is the "Environmental Standard Review Plan, Standard Review Plans for Environmental Reviews for Nuclear Power Plants, Supplement 1: Operating License Renewal" (ESRP, NUREG-1555, Supp. 1, March 2000, as revised [Revision 1, publication pending]). The NRC uses a multi-disciplinary team of specialists or subject matter experts (SMEs) to facilitate the review of LRAs and to produce draft and final sections of the SEIS according to the subject matter assigned.

## **2.0 OBJECTIVE**

The objective of this task order is to obtain technical expertise to assist the Division of License Renewal in conducting portions of the environmental review for the LRA for Braidwood Nuclear Generating Station, Units 1 and 2.

## **3.0 SCOPE OF WORK- ENVIRONMENTAL REVIEW**

### **General Requirements**

The Contractor shall assist NRC in subject matter review and provide input to draft and final SEISs, and related documentation, in support of the license renewal environmental review for Braidwood Generating Station, Units 1 and 2, located near Braceville, Illinois, approximately 60 miles southwest of Chicago.

The Contractor SMEs shall review the applicant's LRA for the Braidwood Nuclear Generating Station, including the ER, as well as other related documents in order to prepare for participation in the site visit and to develop assigned sections of the draft and final SEISs.

The NRC COR will provide a SEIS template or equivalent as guidance, which is a skeleton electronic file illustrating the format of the SEIS. The Contractor SMEs shall provide technical input to the assigned NRC technical reviewers (as designated by the NRC Environmental Project Manager (EPM)) and the NRC Contracting Officer's Representative (COR), for the draft and final SEISs in an MS Word format ready for review by NRC.

Information contained in the SEISs is based on (1) the analysis and findings in the GEIS, (2) the LRA ER submitted by the applicant, (3) interviews conducted during the site visit, (4) consultation with Federal, State, and local agencies, (5) the NRC staff's independent review (supported by the Contractor), and (6) the consideration of public comments.

The Contractor SMEs shall work collaboratively and interactively with the assigned NRC technical reviewers to ensure the technical adequacy and consistency of project deliverables.

Formal written requests for additional information (RAIs) may be sent by the NRC to the applicant (which may require input from the Contractor SMEs) to fill in gaps in knowledge for completing the draft SEISs. All RAIs and Contractor SME inputs shall have a technical and

regulatory basis. However, the NRC staff expects most, if not all, knowledge gaps to be filled at the site visit.

Support to the NRC for completion of the environmental reviews will include comment binning and preparation of comment responses on the draft SEISs. The projected total time to complete the license renewal environmental review is approximately 22 months from Notice to Proceed, if a hearing is not required.

### **Task Requirements for Technical Review and Support for SEIS**

#### **Task 1: Project Kickoff Meeting and Environmental Project Plan**

**Requirement:** The Contractor shall participate in a kickoff meeting at NRC Headquarters with NRC staff, or via teleconference, within 10 working days of task award, or as otherwise directed by the NRC COR. The purpose of the conference call is to discuss overall project planning and preparation of the Environmental Project Plan (EPP) to enable successful execution of the SOW for this task.

The NRC COR and NRC EPM shall establish the elements of the EPP (see Task 2), inclusive of deliverables, schedule, staffing, writing assignments, and projected spending by task; it shall identify expectations and objectives of the technical assistance, timeliness, and quality of review products.

The Contractor shall provide technical assistance in accordance with the EPP, as approved by NRC COR. The Contractor shall send a copy of the EPP electronically to the NRC COR. The plan shall specifically include the schedule (MS Project or similar format), planned deliverables and milestones, and projected spending by task for the duration of the effort.

**Standard:** The Contractor Project Manager (PM), at a minimum, is required to attend the entire task order kickoff meeting, with other key personnel (SMEs) attending, if needed, or participating via conference call.

The EPP shall clearly address the requirements discussed herein.

**Deliverable:** EPP due five (5) working days following the kickoff meeting.

#### **Task 2: Site Visit Planning**

The Contractor shall perform detailed initial technical review of the applicant's ER and provide a list of site visit information needs and/or data gaps, which explains the outstanding technical issues and/or questions relevant to the environmental review, as well as the list of documents to be made available for review at the site visit.

**Standard:** Site visit information needs must have a technical, regulatory, or procedural basis.

**Deliverable:** Information needs are due at least one month prior to the site visit.

#### **Task 3: Site Visit Support**

**Requirement:** The Contractor shall provide planning and onsite support during the NRC/Contractor-led team site visit to the applicant's nuclear power plant site and vicinity.

**Standard:** Participation of Contractor staff designated by NRC COR and written confirmation and acknowledgment that participation is necessary, if relevant technical areas apply (see Sections 5.0 and 7.0).

**Deliverable:** No deliverable required for this task (assumed to occur no later than 90 days after project kickoff, or as specified in NRC-approved EPP schedule).

#### **Task 4: Trip Report**

**Requirement:** The Contractor shall provide a memorandum (as input to the NRC Trip Report) that summarizes information reviewed during the site visit, results of the visit, and meeting discussions.

**Standard:** The memorandum shall clearly summarize site visit activities and participants.

**Deliverable:** Memorandum due no later than 15 days after site visit.

#### **Task 5: Assist With Scoping Summary Report**

**Requirement:** The Contractor shall assist the NRC EPM in assembling, delineating, categorizing, and responding to comments from the environmental scoping process. The Contractor shall provide camera-ready input to the NRC COR for the Scoping Summary Report.

**Standard:** The Contractor shall provide input to the Scoping Summary Report in an appropriate and timely manner. Input to Scoping Summary Report must follow the NRC provided examples/guidance without pre-approved deviation.

**Deliverable:** Scoping Summary Report inputs due 30 days after the end of scoping, or as specified in NRC-approved EPP schedule.

#### **Task 6: Requests for Additional Information**

**Requirement:** The Contractor shall provide the following RAIs that clearly explain specific data needs from the applicant that are necessary to complete the environmental review and/or resolve outstanding technical issues and/or questions,

If necessary, subsequent to NRC issuance of RAIs, the Contractor PM, and a potential subset of Contractor SMEs, will support the NRC via teleconference to discuss the RAIs with the applicant.

**Standard:** The Contractor shall submit the RAIs in a timely manner and follow the NRC provided example/guidance without pre-approved deviation. RAIs shall identify their technical and/or regulatory basis.

**Deliverable:** RAIs due no later than 15 days after site visit, or as specified in NRC-approved EPP schedule.

#### **Task 7: Review Draft SEIS and Team Review Session**

**Requirement:** The Contractor shall: (a) complete detailed technical review of ER and applicant responses to RAIs, (b) provide preliminary inputs to the draft SEIS (including technical editing and which is consistent with the NRC provided guidance and examples), and (c) if necessary, host and/or participate in a NRC/Contractor-led team review session including discussions on technical consistency and conformance with regulatory guidance. Team review comment resolutions will be documented by the Contractor for NRC concurrence and incorporation in the SEIS by the Contractor, as may be directed. The team review session may be held at NRC Headquarters, at the Contractor's office, and/or via internet-enabled meetings, as agreed upon with the NRC COR.

**Standard:** The Contractor shall prepare inputs to the draft SEIS that follows the NRC provided guidance without pre-approved deviation. Independent technical evaluations are expected to document rationale for reliance on applicant and alternate information sources.

**Deliverable:** Inputs to the draft SEIS due and team review session, as necessary, due no later than 90 days after the site visit, or as specified in NRC-approved EPP schedule.

#### **Task 8: Camera-Ready Inputs to the Draft SEIS**

**Requirement:** The Contractor shall provide finalized "camera-ready" inputs to the draft SEIS, suitable for public distribution, which shall incorporate any comments from the team review session and have undergone final consistency and technical editing review.

**Standard:** The draft SEIS inputs shall follow the NRC provided comments/examples/guidance without pre-approved deviation.

**Deliverable:** Finalized inputs to the draft SEIS due as specified in NRC-approved EPP schedule.

#### **Task 9: Public Meeting on the Draft SEIS**

**Requirement:** As may be directed, the Contractor shall plan and provide support for the public meeting on the draft SEIS near the applicant's plant site; the NRC EPM will present the team findings and appropriate team members will participate to respond to questions during the presentation and/or the associated poster session.

**Standard:** Participation of Contractor staff designated by NRC COR and written confirmation and acknowledgment that participation is necessary, if relevant technical areas apply.

**Deliverable:** No deliverable required for this task.

**Task 10: Comment Response Process Support**

**Requirement:** The Contractor shall support the NRC EPM in assembling, delineating, categorizing, and responding to comments received at the public meeting and during the public comment period. SMEs will submit draft responses to public comments within their specified technical areas.

**Standard:** The Contractor shall ensure comments are properly assembled, delineated, categorized, and responded to as an appendix to the SEIS.

**Deliverable:** Comment response input with draft responses to public comments on the draft SEIS due as specified in NRC-approved EPP schedule.

**Task 11: Preliminary Final SEIS and Team Review Session**

**Requirement:** The Contractor shall: (a) provide complete preliminary inputs to the final SEIS (including technical editing) consistent with the NRC provided guidance and examples and that is revised, as appropriate, based on public comments on the draft SEIS and which incorporates any relevant new information, and (b) if necessary, host and participate in NRC/Contractor-led team review session on technical consistency and conformance with template and regulatory guidance. The team review session may be held at NRC Headquarters, at the Contractor's office, and/or via internet-enabled meetings, as agreed upon with the NRC COR.

**Standard:** The Contractor shall provide preliminary inputs to the final SEIS that follow the NRC provided template/guidance without pre-approved deviation. Independent technical evaluations are expected to document rationale for reliance on applicant and alternate sources.

**Deliverable:** Preliminary inputs to the final SEIS due as specified in NRC-approved EPP schedule.

**Task 12: Camera-Ready Inputs to the Final SEIS**

**Requirement:** The Contractor shall provide a "camera-ready" inputs to the final SEIS, suitable for public distribution, which shall incorporate any comments from the team review session and have undergone final consistency and technical editing review.

**Standard:** The inputs to the final SEIS shall follow the NRC provided comments/ guidance without pre-approved deviation.

**Deliverable:** Inputs to the final SEIS due as specified in NRC-approved EPP schedule.

**Task 13: Hearing Support (OPTIONAL TASK TO BE EXERCISED BY COR)**

**Requirement:** The Contractor shall support the NRC staff in preparing for and participating in hearing (including pre-hearing conferences, preparing testimony, attendance as witness, and contributing to the hearing files), if needed.

**Standard:** The Contractor shall ensure participation of individuals (including necessary Contractor SMEs) (and means of participation) designated by NRC COR and that inputs are provided in a timely manner to support hearing activities in advance of legal discussions.

The Contractor shall provide NRC COR written confirmation and acknowledgment that participation is necessary, if relevant technical areas apply.

**Deliverable:** Documentation for inputs (e.g., testimony) to be closely coordinated with NRC legal staff consistent with information provided in the SEIS and filings in response to any contentions. Hearing file records provided on a continuing basis throughout the review. Schedule is to be determined.

#### **4.0 TECHNICAL AND OTHER SPECIAL QUALIFICATIONS REQUIRED**

It is the responsibility of the Contractor to assign technical staff, employees, subcontractors, or specialists who have the required educational background, experience, or combination thereof, to meet both the technical and regulatory objectives of the tasks specified in this statement of work. The NRC will rely on representations made by the Contractor concerning the qualifications of the personnel assigned to this agreement, including assurance that all information contained in the technical and cost proposal, including resumes, is accurate and truthful. The use of experienced personnel for the key positions on each task under this project is essential to the success of the project.

The Contractor shall provide all necessary personnel, equipment, facilities, and materials to accomplish the efforts placed under this contract. The use of particular personnel on this project is subject to the approval of the NRC COR and NRC PO. This includes proposed changes to key task personnel during the life of the agreement, or the end of an assigned task.

Depending on the expertise required for preparing the draft and final SEIS, comment responses and hearing support (if required), the Contractor team may consist of SMEs in one of several technical disciplines, as specified in Section 6.0.

This project may involve the development of information for review guidance, acceptance criteria, and/or bases for commercial nuclear power plant license reviews. The results of this effort have the potential to impact entities regulated by the NRC and industry organizations. The Contractor must be absolutely free from direct, or the appearance of, organizational conflicts of interest with respect to any of the entities subject to NRC conflict of interest criteria. The NRC PO will communicate any necessary approvals to the Contractor.

The NRC COR, through the NRC PO, must approve changes to key personnel. Technical personnel shall have demonstrated experience in their area of responsibility. The work requires degreed economists, scientists, and engineers with experience in the siting of large-scale industrial and energy facilities and familiarity with nuclear power plant designs.

#### **5.0 MEETINGS AND TRAVEL**

Travel to Support Preparation of SEIS:



- One contract kickoff meeting: 1 person (PM), at NRC headquarters for 1-day.
- One Site Visit at the Braidwood Nuclear Generating Station for up to 4-people (4 SMEs), 5-day trip.
- One Draft SEIS Review Session (if needed): 1-person at NRC headquarters for 5-days.
- One Final SEIS Review Session (if needed): 1-person at NRC headquarters for 5-days.

Periodically, over the course of this task order, the Contractor will interact (e.g., via e-mail or telephone) with the NRC COR to discuss (a) project progress, (b) questions, (c) NRC comments, and (d) the conduct and content of subtasks associated with this contract task order. It is anticipated that most of the communication between the NRC and the Contractor will be handled in this manner.

Note: Any additional travel must be approved by the NRC COR, in consultation with the NRC PO, prior to commencement of travel.

## 6.0 LEVEL OF EFFORT

The Contractor will propose the key personnel to serve in the capacity of the PM and each SME of the review team overseeing or performing the actual work subject to the approval of the NRC COR and NRC PO. SMEs will have the required educational background and work experience to meet the objectives of the work specified in this SOW. Emphasis should be placed on previous training or work experience related to environmental reviews for nuclear reactors or other similar actions.

The total Task Order level of effort is estimated to be 1,000 professional and administrative hours.

<b>Labor Category</b>	<b>Total Estimated Hours</b>
Administrative Support	100
Surface and Groundwater	0
Aquatic Ecology	0
Terrestrial Ecology	0
Meteorology/Air Quality	300
Cultural Resources and Archaeology	0
Socioeconomics/Land Use Environmental Justice	300
Alternatives	300
<b>TOTAL</b>	<b>1,000</b>
<b>Note:</b> Team members may fulfill multiple roles subject to their expertise.	

The level of effort assumes that the total number of comments on the draft SEIS across all assigned technical areas will be approximately 200 comments and that about 10 percent will require a refinement of earlier analyses.

## **7.0 DELIVERABLES**

The Contractor shall provide the deliverables, as specified herein and above, electronically to the assigned NRC technical reviewers and to the NRC EPM and NRC COR.

SEIS sections delivered to the NRC must be "camera ready" in MS Word format and delivered electronically or on CD-ROM, if necessary. Figures will be in .tiff and editable PDF formats. NRC will take the electronic files and produce the published report(s). The Contractor will provide administrative support, as needed.

Deliverables shall be written in accordance with NRC provided guidance, and, specifically, shall be consistent with the NRC Division of License Renewal's "EIS Style Guide," September 2011.

For each labor category, the Contractor shall also provide, as may be directed:

- Site visit data needs,
- Site visit memorandum,
- Input to the Scoping Summary Report,
- Input to RAIs,
- Comment response input, as may be directed,
- Updates to the NRC-approved EPP schedule, as necessary.

### **Monthly Status Report**

The Contractor shall provide a monthly status report by the 15<sup>th</sup> of each month. The report shall provide the technical and financial status of the effort and be in a format similar to that contained in the attachment to the SOW. The Contractor shall transmit the report electronically (by e-mail) to the NRC PO (April.Bucher@nrc.gov), NRC COR (Kevin.Folk@nrc.gov), (OCFO\_Obligations.resource@nrc.gov), and (DLR\_RPOB.resource@nrc.gov). A total month ending (or billing cycle) costs shall be provided by e-mail to the NRC PO no later than the 15<sup>th</sup> of the month.

The technical status section of the report shall contain a summary of the work performed under each review during the reported period, and milestones reached, or, if missed, an explanation why; any problems or delays encountered or anticipated, with recommendations for resolution; and plans for the next reporting period. The status shall include information on travel during the period to include trip start and end dates, destination, and travelers for each trip.

The financial status section of the report shall include the total award amount and funds obligated to date; total costs incurred in the reporting period, broken down by direct and indirect costs, and total cumulative costs incurred to date. The status shall also contain the balance of obligations remaining at the end of the period and the balance of funds required to complete the contract/task order. Additionally, the report shall address the status of the Contractor Spending Plan (CSP), showing the percentage of project completion and any significant changes in either projected expenditures, or percentage of completion. The report should also identify the acquisition cost, description (model number, manufacturer) and acquisition date of any

property/equipment acquired for the project during the month with an acquisition cost more than \$500.

If the data in this report indicate a need for additional funding beyond that already obligated, this information may only be used as support to the official request for funding required/requested in accordance with the MD 11.7.

#### License Fee Recovery

This agreement will support tasks that are license fee recoverable under 10 CFR Parts 170 and 171.

Pursuant to the provisions on fees of 10 CFR Parts 170 and 171, provide the total amount of funds spent during the period and cumulative to date for each task/task order by facility. The License Fee Recovery Status Report must be on a separate page, as part of the monthly status report, in the format provided below these instructions.

There should be only one License Fee Recovery Cost Status (LFRCS) table per contract each month for each LRA. The facilities must be identified by docket number and costs reported as whole numbers rounded to the nearest dollar. For work that involves more than one unit at the same site, each unit should be listed separately and the costs should be split appropriately between the units. Common costs, as defined below, must be identified separately in the LFRCS table each month and must be divided among all plants worked on under the program during the month. The total of the period costs reported in the LFRCS table should equal the total of the period costs reported in the Financial Status report. In the event the totals of the costs reported in these two tables are not equal, an explanation for the variance should be given as a footnote to the LFRCS table.

“Common costs” are those costs associated with the performance of an overall program that benefit all similar licensees covered under that program or that are required to satisfactorily carry out the program. Common costs include costs associated with the following: preparatory or startup efforts to interpret and reach agreement on methodology, approach, acceptance criteria, regulatory position, or technical reporting requirements; meetings and discussions involving the above efforts to provide orientation, background knowledge, or guidance during the course of a program; any technical effort applied to a category of plants; and project management.

#### **8.0 NRC FURNISHED MATERIAL**

The NRC COR will provide NRC documents related to the applicable portions of the application that are readily available. The NRC COR will provide access to the applicant's ER and associated documents and other pertinent sections of other NRC safety or environmental documents and docketed correspondence on related issues.

The Contractor staff will identify any additional NRC documentation that is needed, and the NRC COR will determine whether it will be provided by the NRC or obtained directly by the Contractor from NRC's Agency wide Document and Management System (ADAMS), NRC Public Document Room, or the NRC website at [www.nrc.gov](http://www.nrc.gov).