May 8, 2014

MEMORANDUM TO: Glenn M. Tracy, Director
Office of New Reactors

FROM: Michael E. Mayfield, Director ***/RA/***
Division of Advanced Reactors
and Rulemaking
Office of New Reactors

SUBJECT: STATUS OF ACTION PLANS IN RESPONSE TO THE NEW REACTOR LICENSING PROCESS LESSONS LEARNED REVIEW: TITLE 10 OF THE CODE OF FEDERAL REGULATIONS PART 52 REPORT

Enclosed are the current status and milestones for the action plans in response to the "New Reactor Licensing Process Lessons Learned Review: 10 CFR Part 52 Report," dated April 2013. The Division of Advanced Reactors and Rulemaking (DARR) has coordinated the formulation of these action plans with the Division of New Reactor Licensing. In addition, DARR is working with the other Office of New Reactors (NRO) divisions, the Office of Nuclear Reactor Regulation, the Office of Nuclear Regulatory Research, and the Office of Nuclear Security and Incident Response to complete the actions. The interface with the other divisions and offices is primarily in the area of guidance development activities. DARR staff will continue to coordinate the completion of these action plans with the other NRO divisions and U.S. Nuclear Regulatory Commission offices. A table showing the status of the action plans is provided at the end of the enclosure.

Enclosure:
NRO Approach to Address the New Reactor
Licensing Lessons Learned

CONTACT: Dennis Galvin, NRO/DARR
301-415-6256

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NRO Approach to Address the
New Reactor Licensing Process Lessons Learned Review:
10 CFR Part 52 Report

Introduction: This enclosure details the approach the Office of New Reactors (NRO) is taking to address the planned actions identified in the "New Reactor Licensing Process Lessons Learned Review: Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52 Report," hereafter referred to as the Licensing Lessons Learned Report. The approach was formulated by the Division of Advanced Reactors and Rulemaking (DARR) staff in coordination with the other NRO divisions. The DARR staff will track the resolution of the planned actions.

Summary: On April 18, 2013, the Licensing Lessons Learned Report was issued (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13059A240). The Licensing Lessons Learned Report identified lessons learned in seven areas, with 15 planned actions.

This enclosure addresses the 15 planned actions listed in the Licensing Lessons Learned Report. This enclosure also briefly discusses the implementation of the planned actions and lists applicable implementing actions. The implementing actions and their status are summarized in a table at the end of this enclosure.

Concurrent with the development of the Licensing Lessons Learned Report, the staff sent out an internal questionnaire seeking feedback in three broad categories: internal processes, guidance and regulatory requirements, and scheduling. DARR staff has reviewed the responses from the questionnaires and note many of the observations are addressed by the 15 planned actions in the Licensing Lessons Learned Report or other ongoing activities. DARR staff did not identify the need for any additional planned actions from their review of the questionnaire responses. DARR staff has forwarded information from the questionnaires to appropriate programmatic leads and will consider this information in the updating of its internal processes.

Lesson 1 - Quality of Applications: High-quality applications, with sufficient level of design detail and environmental information, are a significant contributor to overall project performance.

Action 1.1: The U.S. Nuclear Regulatory Commission (NRC) staff plans to review its acceptance review guidance to identify areas in need of enhancement.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- Currently, the NRC staff is reviewing its acceptance review guidance in Office Instruction (OI) NRO-REG-100 for potential clarifications and enhancements to better differentiate what level of detail is acceptable for docketing.

- The staff also believes it is beneficial to update Regulatory Guide (RG) 1.206, "Combined License Applications for Nuclear Power Plants (LWR [light-water reactor] Edition)," NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants, LWR Edition," (hereafter referred to as the SRP), and NUREG-1555, "Environmental Reviews for Nuclear Power Plants," (hereafter referred to

as the Environmental Standard Review Plan [ESRP]), to address ambiguity in the level of detail that the NRC considers sufficient to meet the NRC's regulations.

Discussion:

The staff reviewed the draft acceptance review guidance, OI NRO-REG-100, and decided to revise the guidance with criteria to better allow the staff to determine technical sufficiency to complete the review. The staff developed draft guidance for use during the Korea Hydro and Nuclear Power Company (KHNP) APR1400 acceptance review in the fall of 2013. The staff is incorporating feedback from the KHNP APR1400 acceptance review into the revision to the OI. Regarding enhancements to RG 1.206 – see Action 2.1 below.

Implementing Actions:

- Issue working draft NRO acceptance review OI NRO-REG-100, for the KHNP APR1400 acceptance review.

- Incorporate feedback from KHNP acceptance review and issue revision to OI NRO-REG-100.

Action 1.2: The NRC staff plans to adhere more strictly to acceptance review criteria for future applications.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- The staff plans to adhere more strictly to acceptance review guidance for future applications to avoid significant challenges in conducting reviews in an efficient manner and prolonged review schedules in the future.

Discussion:

Expectations were communicated to the staff at the September 23, 2013 NRO all-hands meeting, prior to the KHNP submittal. The staff applied the acceptance review criteria for the KHNP acceptance review and came to the conclusion there was not sufficient information in several areas, resulting in the non-acceptance of the application (ADAMS Accession No. ML13351A417). Going forward, the staff will implement the acceptance review criteria in the revised OI NRO-REG-100, which is discussed under Item 1.1 above. The staff will inform internal and external stakeholders of updates to the acceptance review criteria after OI NRO-REG-100 is issued.

Implementing Actions:

- Present acceptance review expectations at NRO all-hands meeting.

- Apply acceptance review criteria in KHNP application.

- Inform internal and external stakeholders of update to OI NRO-REG-100.

Action 1.3: The NRC staff plans to engage future applicants with regards to the best timing for pre-application audits. The audits will evaluate the level of detail of the application to ensure consistency with lessons learned in reviews since 2006.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- The NRC is incorporating these lessons learned (regarding new concepts or novel design features, initiating interactions well in advance of the expected application date, and pre-application audits) in its current pre-application interactions.

Discussion:

At the request of KHNP, the staff conducted a pre-application readiness assessment[1] with KHNP a little over three months prior to the submittal of the APR1400 design certification (DC) application. KHNP was able to address some issues identified during the readiness assessment in its application (long term cooling and seismic evaluation), but not all (instrumentation and controls [I&C], human factors engineering, probabilistic risk assessment, and radiation protection).

The staff is formalizing guidance related to pre-application readiness assessment timing and level of detail. The staff is incorporating lessons from the KHNP readiness assessment into the guidance. The staff is engaging prospective small modular reactor applicants in pre-application interactions, including the scheduling of pre-application readiness assessments.

Implementing Actions:

- Conduct KHNP readiness assessment.

- Develop NRO pre-application readiness assessment guidance.

Lesson 2: New Reactor Review Guidance: Timely development and maintenance of regulatory guidance are important to support the development of a high-quality application as well as contribute to an efficient regulatory review.

Action 2.1: The NRC staff plans to update RG 1.206 consistent with budgeted resources.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- The staff also believes it is beneficial to update RG 1.206, the SRP, and the ESRP to address ambiguity in the level of detail the NRC considers sufficient to meet the NRC's regulations.

- Feedback from stakeholders indicates the NRC should also update RG 1.206 to be consistent with the updated SRP information and to incorporate the review experience.

[1] Pre-application audits are now called pre-application readiness assessments.

- The staff plans to proceed with an update to RG 1.206, consistent with budgeted resources.

- The issue of necessary level of detail will be considered during the NRC staff's guidance development efforts, particularly with respect to updating RG 1.206.

Discussion:

In February 2014, NRO management decided in principle to update RG 1.206. In April 2014, the staff was seeking internal feedback on scope and schedule of the update. In June 2014, the staff expects to be able to present the update plans to the public. The topics being considered for the scope of the update include:

- Incorporate conforming changes from regulations and guidance (the SRP, RGs, interim staff guidance [ISGs], NUREGs).

- Expand to address all the content of a combined license (COL) application – not just the Final Safety Analysis Report (FSAR).

- Include guidelines for FSAR Chapter 20, Fukushima.

- Incorporate post-2007 lessons learned with early site permit (ESP)/DC/COL applications.

- Expand to include 10 CFR Part 52 (DC, ESP, COL) and 10 CFR Part 50 (construction permit [CP] and operating license [OL]) applications.

- Address pre-application interactions, electronic submittals, 10 CFR Parts 30, 40, and 70 license reviews, and the request for additional information (RAI) process.

- Increase emphasis on expectations for high-quality/complete applications.

- Simplify and clarify to be more user-friendly for new applicants and stakeholders.

The staff notes that the update to RG 1.206 addresses, in part, Actions 1.1, 2.1, 2.2, 2.3, 3.1, 4.1, and 4.2 of this enclosure.

Implementing Actions:

- Update RG 1.206.

Action 2.2: The NRC staff will consider establishing a process for synchronizing updates to RG 1.206 with updates to the SRP. The NRC staff will consider reorganizing RG 1.206 to be more consistent with the organization of the SRP. The NRC staff will also incorporate review experience by considering the results of commonly asked requests for additional information (RAIs) and their respective responses when RG 1.206 is updated.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- The staff will also consider the insights from RAIs issued and RAI responses to inform the update of RG 1.206.

Discussion:

In February 2014, NRO management decided in principle to update RG 1.206. Additional details are discussed under Action 2.1 above.

Implementing Actions:

- Update RG 1.206.

Action 2.3: The NRC staff plans to continue its systematic SRP update, consistent with budgeted resources, in a timely manner to support COL, DC, ESP, and limited work authorization application (LWA) reviews.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- The NRC plans to continue to develop SRP updates to support future application reviews, including the APR1400 and small modular reactor (SMR) designs, consistent with budgeted resources.

- The ISGs will be incorporated into the SRP or RGs, as applicable, as time and resources allow.

Discussion:

The NRC staff's systematic SRP update is an ongoing and budgeted process. The staff conducted an integrated regulatory guidance update inquiry in November 2013 in part to verify effectiveness of the SRP update process. The inquiry was to (1) verify status of guidance updates currently underway, (2) identify additional guidance that needs updating, and (3) highlight technical issues where guidance is lacking. In February 2014, the staff completed its evaluation of the inquiry responses and generally confirmed the anticipated scope and schedule of updates, including 73 SRP sections currently being updated. The inquiry also identified additional guidance updates, which are being evaluated within the available resources.

Implementing Actions:

- Conduct integrated regulatory guidance update inquiry in part to verify effectiveness of the SRP update process.

- Evaluate and present the results of the inquiry.

Action 2.4: The NRC staff plans to proceed with environmental review guidance updates, consistent with budgeted resources.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- A full update [of the ESRP] is needed to incorporate changes in review methods and numerous lessons learned over the past several years.

- The NRC plans to proceed with environmental review guidance updates, consistent with budgeted resources.

- The staff also believes it is beneficial to update RG 1.206, the SRP, and the ESRP to address ambiguity in the level of detail that the NRC considers sufficient to meet the NRC's regulations.

- For example, the NRC plans to issue two environmental ISGs in calendar year 2013, one to clarify the guidance in the ESRP to incorporate lessons learned from completed reviews, and another to clarify the guidance as applied to environmental reviews for licensing applications for SMRs.

Discussion:

Updating the ESRP is a multi-year project that will require significant contract funds. The staff is considering the funding and schedule for the update of the ESRP in coordination with other NRO office priorities. The staff is creating a template and guidance for the updates, drafting two pilot sections, and establishing priorities for the updates of individual sections.

The staff issued for use and comment the two planned environmental ISGs in September 2013. These are COL/ESP-ISG-026, "Interim Staff Guidance on Environmental Issues Associated with New Reactors," and COL/ESP-ISG-027, "Interim Staff Guidance on Specific Environmental Guidance for iPWR Reviews." The staff is processing comments on the ISGs and plans to issue final versions of the ISGs.

Implementing Actions:

- Update the ESRP, NUREG-1555.

- Issue for use and comment ISG for reactor environmental reviews, COL/ESP-ISG-026 and integrated pressurized water reactor (iPWR) environmental reviews COL/ESP-ISG-027.

- Finalize COL/ESP-ISG-026 and COL/ESP-ISG-027.

Lesson 3 - Standardization: Strong design standardization contributes to an efficient regulatory review while on-going design changes have the opposite effect.

Action 3.1: The NRC staff plans to review ISG-11, "Finalizing Licensing-Basis Information," to identify areas in need of enhancement.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- Feedback indicated ISG-11 guidance could be further clarified. The NRC plans to evaluate the implementation of ISG-11 and determine if additional guidance is warranted.

Discussion:

The staff reviewed ISG-11 and determined the enhancement of ISG-11 is not a near term priority. The staff will incorporate ISG-11 into the update to RG 1.206, and will consider enhancements at that time. The update to RG 1.206 is described under Lesson 2, New Reactor Review Guidance, above.

Implementing Actions:

- Incorporate ISG-11, "Finalizing Licensing-Basis Information," into the RG 1.206 update.

Action 3.2: The NRC staff plans to work with industry to expand the design-centered working group role to address common technical issues to ensure consistency across different design centers.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- Stakeholders mutually agreed on the effectiveness of the design-centered working groups and regarded it as a major factor in the success of the licensing process. It was suggested that the concept be a mandatory element of the licensing process. Also, because of its efficiency and prominent role in issue resolution, the design-centered working group concept can be expanded to address common technical issues to ensure consistency across different design centers.

Discussion:

The staff has existing forums to interact with industry on cross-cutting technical issues through the Nuclear Energy Institute and the New Plant Working Group. The staff will consider establishing additional working groups on a case-by-case basis along the lines of the design-centered working group concept to address specific common technical issues. Since these will be established on a case-by-case basis, there are no implementing actions for Action 3.2. The staff notes two broad technical issues where this approach might be applied, (1) Fukushima issues and (2) Bulletin 2012-01, "Design Vulnerability in Electric Power System," have been more effectively worked using the individual design-centered working groups.

Implementing Actions: None.

Lesson 4 - Identification and Resolution of Technical Issues: Early identification and timely resolution of complex technical issues minimize impacts on the review schedules.

Action 4.1: The NRC staff plans to update its staff guidance to ensure consistent use of best practices that facilitate timely resolution of complex technical issues and to more quickly engage higher levels of NRC and applicant management, when necessary, to resolve complex technical issues.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- The NRC staff plans to update its internal guidance to more quickly identify these complex issues, and engage higher levels of NRC and applicant management to resolve these disagreements and to bring about timely resolution.

Discussion:

The staff has developed a guidance document, "NRO Project Schedule Risk Management Process," which provides guidance on how to address identified schedule risks, mitigate and take action to address them, coordinate the information within NRO, and report to management. This guidance document addresses schedule risks that arise both from complex technical issues and NRC resource issues. The guidance document is one of a series of guidance documents posted on the planning and scheduling SharePoint page referred to in the OI, NRO-REG-116, "Planning and Scheduling."

The staff has developed a guidance document, "Project Performance Meeting Procedure," which directs the staff to discuss project schedule risks and major technical challenges with senior NRO managers at weekly project performance meetings.

In addition, as discussed under Actions 2.1, 2.2, and 2.3 above, the staff has processes in place to update guidance to ensure consistent use of best practices that facilitate timely resolution of complex technical issues. This includes updating the SRP and RG 1.206 and issuing ISGs. These actions are already discussed under Actions 2.1, 2.2, and 2.3 above.

Implementing Actions:

- Internally issue "NRO Project Schedule Risk Management Process."

- Internally issue "Project Performance Meeting Procedure."

- See Actions 2.1, 2.2, and 2.3.

Action 4.2: The NRC staff plans to continue to engage stakeholders including: vendors, standards organizations, and other regulatory bodies on complex and evolving technologies to enhance safety while streamlining the review process.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- The issue of necessary level of detail will be considered during the NRC staff's guidance development efforts, particularly with respect to updating RG 1.206, discussed above in Lesson 2, New Reactor Review Guidance.

- Complex technical issues and evolving-technology issues (e.g., seismic, structural, and digital I&C) are being addressed under separate initiatives, such as the SRP updates described under Lesson 2, New Reactor Review Guidance.

Discussion:

As discussed in the Licensing Lesson Learned Report, the staff addresses complex technical issues and evolving-technology though updates to its guidance, including the SRP and RG

1.206. Since these actions are already discussed under Actions 2.1, 2.2, and 2.3 above, no specific implementing actions are identified for Action 4.2.

Implementing Actions:

- See Actions 2.1, 2.2, and 2.3.

Lesson 5 - Knowledge Management: Improvements to NRC's management system for RAIs can further enhance project knowledge management and contribute to a more efficient review.

Action 5.1: The NRC staff plans to enhance its RAI management system (eRAI) to improve search capability, consistent with budgeted resources.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- While the current system has some search capability, it is limited, and the NRC is exploring upgrades to the system to improve this feature.

Discussion:

The staff transitioned to SharePoint 2010 as the operating environment for eRAI. SharePoint 2010 allows searching of RAI questions and all text fields. The previous version of SharePoint had limited search capabilities.

Implementing Actions:

- Transition to SharePoint 2010 as the operating environment for eRAI to enhance RAI search capabilities.

Action 5.2: The NRC staff plans to continue to examine its RAI process to ensure that RAIs are tracked consistently across design centers and information is communicated to applicants and NRC management in a timely fashion.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- The NRC recognized this as an area in need of improvement and recently formed an internal working group to examine how the NRC staff ensures RAIs are tracked consistently across design centers and that timely information about RAIs is communicated to applicants and NRC management.

Discussion:

eRAI Release 2.0 and subsequent upgrades were planned and implemented in close coordination with the eRAI User Group and with the eRAI Branch Chief Working Group. These groups represent broad constituencies throughout NRO. Updates include streamlined status processing and tighter coupling of RAI and question status with the tracked workflow processing, fewer and less confusing status options, greater standardization of process across

Design Centers, changes to support Environmental RAIs, tracking of key Open Item Timeliness dates, and new or revised reports better suited to current operations.

In parallel, the staff developed training on the eRAI Release 2.0, along with an eRAI user manual with process flow charts. Training on eRAI 2.0 is mandatory for technical reviewers and project management staff.

The OI governing RAIs and the eRAI system, NRO-REG-101, "Processing Requests for Additional Information," is being updated to reflect eRAI 2.0 and feedback on its use. The OI establishes clearer and more consistent roles, responsibilities, deadlines, status criteria, and other related guidance as it reflects changes in the eRAI system.

Implementing Actions:

- Transition to eRAI 2.0 to enhance RAI tracking.

- Update the RAI OI NRO-REG-101.

Lesson 6 - Application Timing and Sequencing: Concurrent reviews of DCs and COL applications contribute to maximizing standardization. DC rulemakings should not commence until all design issues are resolved.

Action 6.1: The NRC staff plans to apply the rulemaking process for future design certifications consistent with the 2009 streamlined approach. In this approach, all design issues have been resolved before rulemaking begins.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- The staff continues to believe completion of a final rule is possible in 12.5 months if all assumptions for the streamlined process are adhered to, including ensuring all design issues have been resolved before the rulemaking begins. Accordingly, the NRC has scheduled future DC rulemakings in accordance with this approach.

Discussion:

The staff's streamlined DC rulemaking approach is described in SECY-09-0018, "Streamlining Design Certification Rulemakings." The staff is continuing to implement this approach. The staff is revising OI NRO-REG-114, "Rulemaking Procedures," to include an appendix on DC rulemaking consistent with SECY-09-018. The revision will also incorporate lessons learned from recent DC rulemaking.

Implementing Actions:

- Revise rulemaking OI NRO-REG-114, to include the staff's streamlined DC rulemaking approach.

Lesson 7 - Updates to Regulations: Updates to the regulations incorporating lessons learned will contribute to an enhanced licensing process.

Action 7.1: Although this lessons learned effort did not identify any significant problems or impediments with the 10 CFR Part 52 licensing process, it has identified areas for enhancements. In fact, the staff has been identifying and collecting ideas for improvements since the 2007, 10 CFR Part 52 update. The NRC staff plans to communicate potential regulatory enhancements to the Commission along with a proposed rulemaking plan to obtain Commission approval to move forward with an update to 10 CFR Part 52 and associated regulations.

The Licensing Lessons Learned Report makes the following statements with regard to this action:

- Consider adding a process to allow changes in the information contained in an LWA.

- Consider a change to the 10 CFR Part 73, "Physical Protection of Plants and Materials," requirements, particularly as they apply to holders of a COL.

- In addition, the staff will incorporate identified post-COL implementation enhancements as part of the staff's ongoing self-assessment, into a proposed rulemaking activity as appropriate.

- The staff plans to communicate appropriate regulatory enhancements to the Commission along with a proposed rulemaking plan to obtain Commission approval to move forward with an update to 10 CFR Part 52 and associated regulations.

Discussion:

The staff is developing a Commission paper regarding updating new reactor licensing policies, rules, and guidance that in part addresses this topic. Topics under consideration for inclusion in the Commission paper include a rulemaking effort to address 10 CFR Part 52 lessons learned, the alignment between 10 CFR Parts 50 and 52, and the potential application of certain policies established for licensing new reactors under 10 CFR Part 52 to new power reactor applications under 10 CFR Part 50.

Implementing Actions:

- Issue Commission paper discussing rulemaking effort to address 10 CFR Part 52 lessons learned.

Licensing Lessons Learned Report – Action Plan Status

ACTION	Lead	Status/Next Action
Lesson 1 - Quality of Applications		
Action 1.1: Issue working draft acceptance review OI NRO-REG-100, for the KHNP APR1400 acceptance review	DARR	Complete 9/2013
Action 1.1: Incorporate feedback from KHNP acceptance review and issue revision to OI NRO-REG-100	DARR	2nd Qtr CY2014
Action 1.2: Present acceptance review expectations at NRO all-hands meeting	DARR	Complete 9/2013
Action 1.2: Apply acceptance review criteria in KHNP application	DNRL	Complete 12/2013
Action 1.2: Inform internal and external stakeholders of update to OI NRO-REG-100	DARR	3rd Qtr CY2014
Action 1.3: Conduct KHNP readiness assessment	DNRL	Complete 6/2013
Action 1.3: Develop NRO pre-application readiness assessment guidance	DARR	2nd Qtr CY2014
Lesson 2 - New Reactor Review Guidance		
Actions 2.1 and 2.2: Update RG 1.206	DARR	TBD
Action 2.3: Conduct integrated regulatory guidance update inquiry in part to verify effectiveness of the SRP update process	DARR	Complete 11/2013
Action 2.3: Evaluate and present the results of the inquiry	DARR	Complete 2/2014
Action 2.4: Update the ESRP, NUREG-1555	DSEA	TBD
Action 2.4: Issue for use and comment ISG for reactor environmental reviews, COL/ESP-ISG-026 and iPWR environmental reviews COL/ESP-ISG-027	DARR	Complete 9/2013
Action 2.4: Finalize COL/ESP-ISG-026 and COL/ESP-ISG-027	DARR	2nd Qtr CY2014
Lesson 3 – Design Standardization		
Action 3.1: Incorporate ISG-11, "Finalizing Licensing-Basis Information," into the RG 1.206 update	DARR	TBD
Action 3.2: None		
Lesson 4 - Identification and Resolution of Technical Issues		
Action 4.1: Internally issue "NRO Project Schedule Risk Management Process"	DARR	Complete 5/2013
Action 4.1: Internally issue "Project Performance Meeting Procedure"	DARR	Complete 3/2014
Actions 4.1 and 4.2: See Actions 2.1 to 2.3	DARR	Multiple
Lesson 5 - Knowledge Management		
Action 5.1: Transition to SharePoint 2010 as the operating environment for eRAI to enhance RAI search capabilities	DARR	Complete 4/2013
Action 5.2: Transition to eRAI 2.0 to enhance RAI tracking	DARR	Complete 7/2013
Action 5.2: Update the RAI OI NRO-REG-101	DARR	2nd Qtr CY2014
Lesson 6 - Application Timing and Sequencing		
Action 6.1: Revise rulemaking OI NRO-REG-114, to include the staff's streamlined DC rulemaking approach	DARR	2nd Qtr CY2014
Lesson 7 - Updates to Regulations		
Action 7.1: Issue Commission paper discussing rulemaking effort to address 10 CFR Part 52 lessons learned	DARR	2nd Qtr CY2014

TBD: Schedule under development