Suggested Guidance for Implementation of 10 CFR 50.46c

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50.46c Implementation Workshop

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SUGGESTIONS FOR GUIDANCE

- Implementation Guidance for Licensees through:
  - Regulatory Issue Summary (RIS)
  - Industry-developed guidance

- Review Guidance for reviewers through:
  - Review Standard (RS)
  - Standard Review Plan (SRP) or
  - Branch Technical Position (BTP)

SUGGESTIONS FOR GUIDANCE TO LICENSEES

- Prepare RIS similar RIS 2002-03 for content of applications for Measurement Uncertainty Recapture Power Uprates and RIS 2006-04 for implementation of Alternate Source Term

- Provide clarification of regulatory requirements

- Provide clarification of Statements of Consideration

- Provide Comment Resolution Matrix in response to industry comments

- Hold workshop on guidance and seek stakeholder feedback similar to what was done for RIS 2002-03

SUGGESTIONS FOR GUIDANCE TO LICENSEES

- Provide guidance on meeting schedule for demonstrating compliance

- Provide guidance on threshold and criteria for providing a letter documenting compliance versus submitting analyses for NRC review

- Clarify what constitutes "compliance" – submittal (letter or analyses) or approval?

SUGGESTIONS FOR GUIDANCE TO LICENSEES

- Guidance on content of letter documenting compliance

- Guidance on content of submittals of analyses for review

- Guidance on content of submittals for COLR reference changes only

SUGGESTIONS FOR GUIDANCE TO LICENSEES

- Identify NRC expectation for review time and SER (depending on type of submittal) as was done in RIS 2002-03

- Provide guidance on separate licensing actions under 10 CFR 50.46c and 10 CFR 50.90

- Consider an industry task force to work with NRC on developing guidance for implementation

SUGGESTIONS FOR GUIDANCE TO REVIEWERS

- Follow precedence in Review Standard RS-001 for Extended Power Uprates

- Consider other possible guidance through Standard Review Plan (SRP) revision or a Branch Technical Position (BTP)

- Create generic template for SER (similar to CLIIP for TSTF) for submittals of analyses (50.46c) and Technical Specification COLR reference changes (50.90)

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QUESTIONS

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