

Industry Implementation Schedule

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Chair, Regulatory Technical Advisory Committee

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Public Webcast: 10 CFR 50.46c Implementation

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Purpose

- Identify Fleet Implementation Schedule
 - Base Line
 - Minimum Effort to Achieve Compliance
 - Living Document
 - Updated as circumstances firm-up
 - Assumptions
 - Based in Part on NEI Draft Rule Comment Package
 - Public Meeting Discussion

Assumptions *(Relative to Draft Rule)*

- With Respect to the Rule:
 - Base Line is Draft Rule from Federal Register Notice
 - Base Line Delta's:
 - Long Term Cooling remains consistent with current rule
 - Existing methodology supplements only address explicit changes relative to the existing rule language
 - “New” methodologies encompass entire new rule language

Assumptions *(Relative to Draft Rule)*

- With Respect to the Rule: *(continued)*
 - Base Line is Draft Rule from Federal Register Notice
 - Base Line Delta's:
 - Breakaway Oxidation testing to become integrated into Vendor manufacturing / quality programs
 - Establish criteria for methodology application
 - Allowance for fuel manufactured prior to vendor program

Assumptions *(Relative to Draft Rule)*

- With Respect to the Rule: *(continued)*
 - Base Line is Draft Rule from Federal Register Notice
 - Base Line Delta's:
 - Resolution of debris related issues (e.g., GSI-191), whether by deterministic or risk-informed approach, addressed per existing owners group programs
 - Handled outside of 50.46c implementation
- No Additional Draft Rule Publication to FRN

Assumptions *(Schedule)*

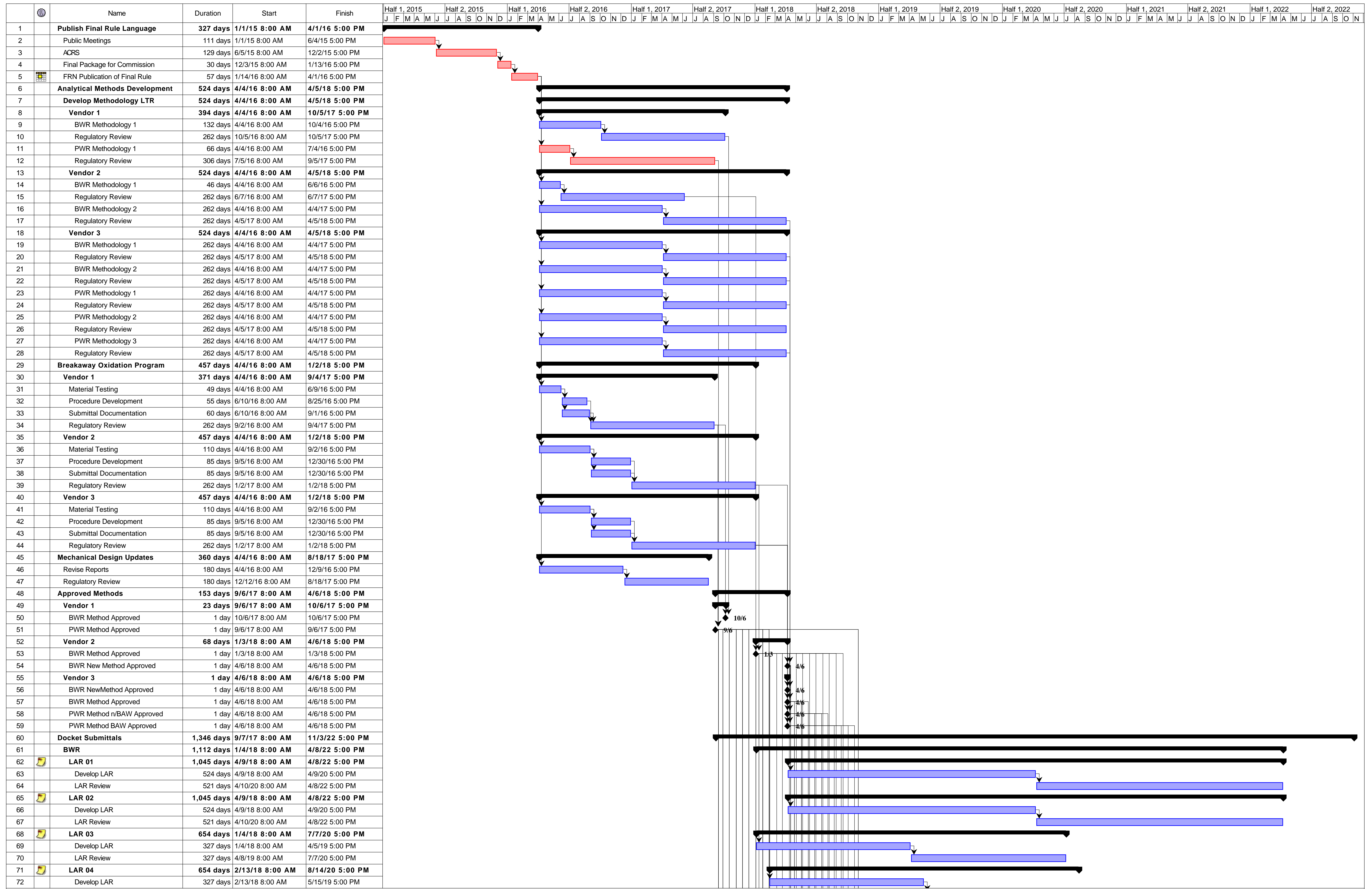
- Base Line Schedule:
 - Minimum Needed for Compliance
 - Base Line January 1, 2015
 - FRN Notice of Final Rule April 1, 2016
 - Two Phases
 - Completing Methods and Programs Development
 - Docketing of Licensee Submittals

Assumptions *(Schedule)*

- Base Line Schedule: *(continued)*
 - Hydrogen Pickup Models from Regulatory Guide
 - No Vendor Specific Models *(not critical path issue)*
 - LAR Staggering for Each Vendor
 - One submittal every other week on average
 - Level of Effort
 - Level 1: Post-processing existing analysis
 - Level 2: New, limited confirmation analyses
 - Level 3: Full re-analyses

The Base Line

- Significant Times
 - FRN Rule Publication: April 1, 2016
 - First Vendor Submittal: June 2016
 - Initial LAR Submittal: September 2018
 - Last LAR Submittal: April 2020
 - First LAR SE Issued: May 2019
 - Final Fleet Compliance: April 2022



ID	Name	Duration	Start	Finish	Half 1, 2015				Half 2, 2015				Half 1, 2016				Half 2, 2016				Half 1, 2017				Half 2, 2017				Half 1, 2018				Half 2, 2018				Half 1, 2019				Half 2, 2019				Half 1, 2020				Half 2, 2020				Half 1, 2021				Half 2, 2021				Half 1, 2022				Half 2, 2022																																																																		
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