

January 27, 1994

Docket Nos. 50-244, 50-263, 50-266, 50-301,  
50-282, 50-306, and 50-305

LICENSEES: Northern States Power Company, Wisconsin Public Service,  
Wisconsin Electric Power, and Rochester Gas & Electric

FACILITIES: Monticello, Prairie Island, Kewaunee, Point Beach, and Ginna  
Nuclear Power Plants

SUBJECT: MEETING SUMMARY OF JANUARY 11, 1994

On January 11, 1994, representatives from the Cooperative Efforts Group which consists of Northern States Power, Wisconsin Electric Power, Wisconsin Public Service, and Rochester Gas & Electric met with representatives from the NRC to discuss Cost Beneficial Licensing Actions (CBLAs). The meeting was held at the Northern States Power corporate office in Minneapolis. A list of attendees is enclosed (Enclosure 1). The meeting agenda and overhead slides used during the meeting are also enclosed (Enclosure 2).

The meeting provided an opportunity for representatives from the Cooperative Efforts Group to meet with Mr. Ledyard Marsh who heads the NRC task force on CBLAs. Mr. Marsh gave the NRC perspectives on CBLAs and a representative from each plant provided his/her licensee's approach and current status of CBLA submittals.

Original signed by  
Beth A. Wetzel, Acting Project Manager  
Project Directorate III-1  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. List of Attendees
- 2. Agenda and Overhead Slides

cc: w/enclosures  
See next page

OFFICE	LA:PD31	PM:PD31	(A)PD:PD31
NAME	CJamerson	BWetzel	RBrough
DATE	01/27/94	01/27/94	01/27/94

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DISTRIBUTION FOR MEETING SUMMARY FOR 1/11/94 MEETING

DATED: January 27, 1994

w/enclosures 1&2:

Docket File  
NRC & Local  
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B. Jorgensen, Region III

w/enclosure 1 only:

T. Murley/F. Miraglia  
J. Roe  
J. Zwolinski  
L. Marsh  
A.R. Blough  
C. Jamerson  
OGC  
E. Jordan  
R. Bywater, Region III  
M. Gamberoni  
A. Johnson, 14D16  
A. Gody  
A. Hansen  
ACRS (10)  
W. Dean, EDO, 17G21.

cc: Licensee & Service List (with all enclosures)

310015

January 11, 1994

Cooperative Efforts Group Meeting on CBLAs

List of Attendees

<u>Name</u>	<u>Organization</u>
L. Marsh	NRC
A. Blough	NRC
B. Wetzel	NRC
R. Bywater	NRC
R. Anderson	Northern States Power
D. Musolf	Northern States Power
G. Eckholt	Northern States Power
T. Coss	Northern States Power
M. Opstad	Northern States Power
D. Whitcomb	Northern States Power
S. Bernhoft	Wisconsin Public Service
T. Malanowski	Wisconsin Electric
G. Wrobel	Rochester Gas & Electric

**COOPERATIVE EFFORTS GROUP MEETING  
ON COST BENEFICIAL LICENSING ACTION ISSUES**

**JANUARY 11, 1994**

**AGENDA**

- ▶ **OPENING REMARKS - ROGER ANDERSON, NSP**
  
- ▶ **NRC PERSPECTIVES ON COST BENEFICIAL LICENSING ACTIONS -  
TAD MARSH, NRC**
  
- ▶ **OVERVIEW OF NORTHERN STATES POWER REGULATORY REDUCTION  
PROGRAM - GENE ECKHOLT, NSP**
  
- ▶ **SUMMARY OF POTENTIAL REGULATORY REDUCTION ITEMS  
IDENTIFIED AS PART OF MONTICELLO REVIEW - DAVE MUSOLF, NSP**
  
- ▶ **OVERVIEW OF ROCHESTER GAS AND ELECTRIC REGULATORY  
REDUCTION EFFORTS - GEORGE WROBEL, RG&E**
  
- ▶ **OVERVIEW OF WISCONSIN ELECTRIC POWER REGULATORY REDUCTION  
EFFORTS - TOM MALANOWSKI, WEP**
  
- ▶ **OVERVIEW OF WISCONSIN PUBLIC SERVICE REGULATORY REDUCTION  
EFFORTS - SHERRY BERNHOFT, WPS**
  
- ▶ **OPEN DISCUSSION**

# Cost Beneficial Licensing Actions

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- **BACKGROUND**
  - CBLA Task Force, short term, how licensees can develop and NRC review amendments and exemption requests with HIGH cost and low safety value.
  - Focus on VEPCO, FPC, NEU Programs
  
- **KEY ASSUMPTIONS and PREMISES**
  - NRC must be responsive.
  - Fixed NRC resources. No extra resources for CBLAs.
  - Relaxations/Reliefs can result in SAFER nuclear plants.
  - NRC Program is NOT time limited. But, TIMES MAY CHANGE. STRIKE WHILE THE IRON IS HOT
  - Cost savings considerations are appropriate for setting work Priority, not as the basis for approval or rejection of a specific proposal.
  - Before embarking on a CBLA Program, consider the overall NRC/Licensee agenda. Discuss w/ PM and Region.

# Cost Beneficial Licensing Actions

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- **TASK FORCE PROCESS / STATUS**
  - Review various CBLA programs. Meet w/ licensees.
  - Meet w/ NUMARC, Owner's Groups, NRC Task Forces, etc.
  - Find bottlenecks, facilitate problem solving.
  - Develop recommendations and final report.
  - Report now issued and public; task force ending.
- **EXISTING and PLANNED CBLA PROGRAMS**
  - Immediate vs Delayed benefit; "top down" vs "bottom up"
  - Plant specific vs Generic CBLAs; "easy" vs "complex" CBLAs
  - Many vs few commitment changes, some don't need NRC review
  - many low value vs few high value CBLAs
  - Original CBLAs vs copies of others' CBLAs
  - High quality, stand alone documents vs lesser quality
- **MAXIMUM SUCCESS**
  - Submittals preceded w/ good communication w/ PM and Region
  - High quality, stand alone documents; plant specific
  - No major policy or regulatory issues; all priorities clear
  - Immediate benefit to licensee

# Cost Beneficial Licensing Actions

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- **RECOMMENDATIONS FOR INDUSTRY**
  - **Prioritize all licensing actions, especially CBLAs**
  - **Don't "clog the system" - avoid a LOGJAM**
    - \* **submit only actions that require NRC review**
    - \* **submit high value CBLAs**
    - \* **don't "broaden" the CBLA definition**
    - \* **make your submittals top quality**
    - \* **work generically, establish LEAD plants**
    - \* **don't submit unnecessary CONTINGENCY items**
  - **Include cost information in submittals**
  - **Calling a licensing action a CBLA doesn't mean it WILL be approved. Proposals must be technically sound.**
  - **Have an OVERALL PLAN for your CBLA program**
  - **Licensees support submittals. Prod us periodically.**
  - **Adequately communicate w/ NRC. Tell us what you're doing.**

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# Cost Beneficial Licensing Actions

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- **RECOMMENDATIONS for NRC**
  - Maintain mgmnt att'n to CBLAs. Single focal point.
  - Integrate RRG and CLB efforts into CBLA effort
  - Consider contractor for CBLA items.
  - Better Prioritization. Broader Perspective - include COST
  - Work issues generically, where possible
  - Better attention to finding bottlenecks and problems
  - Prompt policy decisions on problems
  - Work with industry to clearly define "CBLA"
  - Continue discussions / workshops w/ staff on new NRR direction regarding cost reductions and other task forces
  - Screen ALL licensing actions. Look for items that can be done by licensees, generic items, repetitious items
  - Reject unnecessary or contingency items
  - Expand improvements for SER retrieval and work search capability.
  - Project Managers clearly understand licensee's CBLA program
  - Give CBLAs appropriate attention. Don't over-react!



**COOPERATIVE EFFORTS GROUP MEETING  
ON COST BENEFICIAL LICENSING ACTION ISSUES**

**JANUARY 11, 1994**

**Wisconsin Electric Power Company Initiative**

- Program Overview
- Program Status
- CBLA Items Identified
- Requirement/Commitment Change Methodology

## **PROGRAM OVERVIEW**

- **Request Feedback From Department Personnel**
- **Interview Operators/First-Line Supervisors**
- **Review Industry Submittals**
- **Present Proposed CBLAs to PBNP Staff for Selection & Prioritization**
- **Current Licensing Basis Project**
- **Determine Change Method**

## PROGRAM STATUS

- 25 Recommendations Received
- In Process of Reviewing Industry Submittals for Applicability to PBNP

## **CBLA ITEMS IDENTIFIED**

- Boric Acid Concentration Reduction
- Integrated Leakrate Test Reduction (Appendix J)
- QA Audit Frequencies to FSAR
- NSP/RGE/WE/WPS Technical Specifications Comparison
- Others:
  - Security
  - FFD

# REQUIREMENT/COMMITMENT CHANGE METHODOLOGY

## Regulatory Requirements

NRC Rules & Regulations (10 CFR)

NRC Confirmatory Orders

PBNP Operating License

Technical Specifications

Exemptions

## Changes?

Require prior approval by NRC

# REQUIREMENT/COMMITMENT CHANGE METHODOLOGY

## Regulatory Commitments

Commitments associated with regulatory requirements

NRC Safety Evaluation Reports

Responses to NOV's

Commitments associated with non-cited violations

FSAR

## Changes?

10 CFR 50.59 Safety Evaluation

# REQUIREMENT/COMMITMENT CHANGE METHODOLOGY

## Licensee Commitments

Responses to Generic Letters

Responses to Bulletins

Responses to NOD's

LERs

## Changes?

10 CFR 50.59 Safety Evaluation

Responses to Generic Letters

Responses to Bulletins

Responses to NOD's

NRC Resident Inspector Notification

LERs

**\*\* PRIOR NRC APPROVAL NOT REQUIRED \*\***

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