S. Bryan

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DEC 29 1980

MEMORANDUM FOR: Darrell G. Eisenhut, Director, Division of Licensing, NRR

FROM: Norman C. Moseley, Director, Division of Program Development and Appraisal, IE

SUBJECT: NUREG 0737 IMPLEMENTATION PLAN FOR OPERATING REACTORS: OIE COMMENTS

We have reviewed the proposed plan in your memorandum of December 12, 1980 and offer the following comments relative to OIE followup.

Your memorandum recognized an important point in the statement that NRR post-implementation reviews must be by SER to provide an IE inspection index. In many cases IE may have already verified implementation, in accordance with the licensee's commitment, before the post-implementation review is done. Thus, we believe that the SER should specifically state whether the licensee's proposal was approved as is or whether any change was made in the licensee's commitment. A change would require re-inspection to confirm implementation.

The memorandum states that OIE review items have not yet been identified. However, the plan indicates that for several items where no plant specific review by NRR is planned, the guidance provided to the licensee by NRR should be adequate for direct implementation and followup verification by IE. We would consider any such cases to be OIE review items because, if NRR does not review the licensee's proposed action for acceptability, IE will have to do so before completing the verification.

Accordingly, in reviewing the table in the proposed plan, we have considered any item that NRR will not review to be a request for IE review (although we believe that was not always intended). With this in mind, we have the following comments.

Item I.A.1.3, Part 1 - We accept review responsibility.

Item I.A.2.1 - We believe these items are inappropriate for IE review/verification as stated. They include items that operator license applicants must demonstrate on their applications to OLB, and that the text in NUREG 0737 says OLB will check. IE would merely be checking to see if proper submittals had been made to OLB, NRR.

Item I.A.3.1 - We believe this item is inappropriate for IE review/verification as stated. It involves examining operators, which OLB, NRR will be doing.

Item I.C.5 - We accept review responsibility.

Item I.C.6 - We accept review responsibility.

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Item II.B.4, Part 1 - This item indicates no licensing action. It involves program development for training by OLB, which would be inappropriate for IE review. Thus, we cannot accept review responsibility.

Item II.K.2, Item 11 - We accept review responsibility.

Item II.K.3, Item 22a - We accept review responsibility.

Norman C. Moseley
Director
Division of Program
Development and Appraisal, IE

cc: V. Stello, IE
H. Denton, NRR
E. Case, NRR
J. Cummings, OIA
T. Novak, NRR
R. Tedesco, NRR
J. Sniezek, IE
S. Bryan, IE
D. Allison, IE
R. Emch, NRR
S. Hanauer, NRR
D. Ross, NRR
R. Vollmer, NRR
T. Murley, NRR