

CHARTER  
COMMITTEE TO REVIEW GENERIC REQUIREMENTS

Revision 2  
March 1986

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APPROVED BY THE COMMISSION JUNE 16, 1982 (SECY-82-39A)

REVISION 1 APPROVED BY THE COMMISSION (SECY MEMO DTD 1/6/84)

I. PURPOSE

The Committee to Review Generic Requirements (CRGR) has the responsibility to review and recommend to the Executive Director for Operations (EDO) approval or disapproval of requirements or staff positions to be imposed by the NRC staff on one or more classes of power reactors. This review applies to staff proposals which reduce existing requirements and proposals which increase or change requirements. The implementation of this responsibility shall be conducted in such a manner so as to assure that the provisions of 10 CFR 2.204, 10 CFR 50.109 and 10 CFR 50.54(f) as pertaining to generic requirements and staff positions are implemented by the staff. ~~The-CRGR-will-develop-means-for controlling-the-number-and-nature-of-the requirements placed-by-NRC-on-licensees.~~ The objectives of the CRGR process are these-controls-are to eliminate or remove any unnecessary burdens placed on licensees, reduce the exposure of workers to radiation in implementing some of these requirements, and conserve NRC resources while at the same time assuring the adequate not-reducing-the levels-of protection of the public health and safety. The CRGR and the associated staff procedures will assure NRC staff implementation of 10 CFR 50.109 for generic backfit matters. The ~~controls~~ overall process will assure ~~should-make-sure~~ that requirements and staff positions in place or to be issued (a) do in fact contribute effectively and significantly to the health and safety of the public, and (b) do lead to utilization of both NRC and licensee resources in as optimal a fashion as possible in the overall achievement of protection of public health and safety. By having the Committee submit recommendations directly to the EDO, a single agencywide point of control will be provided.

The CRGR will focus primarily on proposed new requirements and staff positions, but it will also review selected existing requirements and staff positions which may place unnecessary burdens on licensee or agency resources. In reaching its recommendation, the CRGR shall consult with the proposing office to ensure that the reasons for the proposed requirement or staff position are well understood and that the provisions of 10 CFR 50.109, 50.54(f), and 10 CFR 2.204, if applicable, are appropriately addressed by the staff proposal. If the CRGR recommends disapproval or major modifications of a proposed requirement or staff position, it shall submit to the EDO a statement of the reasons for its recommendations. This statement shall provide a clear indication of the basis for the recommendation not to apply the requirement or staff position to individual reactors or classes of reactors, and when appropriate, relate this basis to the provisions of 10 CFR 50.109, 50.54(f), and 10 CFR 2.204.

Tools used by the CRGR for scrutiny are would-be expected to include cost-benefit analysis and probabilistic risk assessment where data for its proper use are adequate unless cost analyses are not required by 10 CFR 50.109. Therefore, to the extent possible, written staff justifications should make use of these evaluation techniques. The use of cost-benefit analyses and other tools should make it possible to determine which proposed requirements and staff positions have real safety significance, as distinguished from those proposed requirements and staff positions which should be given a lower priority or those which might be dropped entirely. When such techniques cannot be applied for lack of available appropriate, or relevant data, other methods will be used.

The EDO may authorize deviations from this Charter when the EDO finds that such action is in the public interest and the deviation otherwise complies with applicable regulations. Such authorization shall be written and shall become a part of the record of CRGR actions.

II. MEMBERSHIP

This Committee shall be chaired by the Deputy Executive Director for Regional Operations and Generic Requirements (DEDROGR), and it shall consist of, in addition to the DEDROGR, one individual each from NRR, IE, NMSS, RES, AEOD and ELD, appointed by the Executive Director for Operations. The Office of the DEDROGR will provide staff support. The Committee may use several non-NRC persons as consultants in special technical areas.

New members will be appointed by the EDO as the need arises. If a member cannot attend a meeting of the CRGR, his Office Director may propose an alternate for the EDO's approval. It is the responsibility of the alternate member to be fully versed on the agenda items before the Committee.

III. CRGR SCOPE

A. The CRGR shall consider all proposed new generic requirements and staff positions to be imposed by the NRC staff on one or more classes of power reactors that are submitted for review by the offices. These include:

- (i) All staff papers which propose the adoption of rules or policy statements affecting power reactors or modifying any other rule so as to affect technical requirements applicable to reactor licensees, including technical information required of reactor licensees or applicants for reactor licenses or construction permits.
- (ii) All staff papers proposing new or revised rules of the type described in paragraph (i), including Advanced Notices.
- (iii) All proposed new or revised regulatory guides; all proposed new or revised Standard Review Plan (SRP) sections; all proposed new or revised branch technical positions; all proposed generic letters; all multipiant orders, show cause orders, and 50.54(f) letters; all bulletins and circulars; and USI NUREGs; and all new or revised Standard Technical Specifications.

Staff proposed generic 10 CFR 50.54(f) letters will be examined by the CRGR in accordance with 10 CFR 50.54(f). Except for information sought to verify licensee compliance with the current licensing basis for a facility, the staff must prepare the reasons for each information request to ensure that the burden to be imposed on respondents is justified in view of the potential safety significance of the issue to be addressed in the requested information. CRGR examination of generic letters will include

those letters proposed to be sent to construction permit holders.  
For those plants for which an operating license is not yet issued,  
an exception to staff analysis may be granted only if the staff  
seeks information of a type routinely sought as part of the  
standard procedures applicable to the review of applications. If  
a request seeks to gather information pursuant to development of a  
new staff position, then the reasons for the request must be pre-  
pared and approved prior to issuance of the request. When staff  
evaluations of the necessity for a request are required, the  
evaluation shall include at least the following elements:

- (a) A problem statement that describes the need for the information in terms of potential safety benefit.
- (b) The licensee actions required and the cost to develop a response to the information request.
- (c) An anticipated schedule for NRC use of the information.

- B. The CRGR shall consider all licenses, license amendments, approvals of Preliminary Design Approvals (PDAs) and Final Design Approvals (FDAs), minutes of conferences with owners groups, licensees or vendors, staff approvals of topical reports, information notices, and all other documents, letters or communications of a generic nature that are submitted for review by the offices and which are represented to reflect or interpret NRC staff positions, unless such documents refer only to requirements

or staff positions<sup>1</sup> previously applicable to the affected licensees and approved by the appropriate officials. The following are examples of approved staff positions requirements not requiring CRGR review:

- (i) positions or interpretations which are contained in regulations, policy statements, regulatory guides, the Standard Review Plan, branch technical positions, generic letters, orders, topical approvals, PDAs, FDAs, licenses and license amendments which have been promulgated prior to November 12, 1981. Any document or communication of this type shall cite and accurately state the position as reflected in a previously promulgated regulation, order, Regulatory Guide, SRP, etc.
- (ii) positions after November 12, 1981 that-date which have been approved through this established generic review process.

- C. For those rare instances where it is judged that an emergency immediately effective action is needed to ensure that facilities pose no undue risk to protect the health and safety of the public (10 CFR 50.109(a)(4)(ii)), , no review by the CRGR is necessary. However the staff shall conduct an analysis including a statement of the objectives of and reasons for the actions and the basis for not

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1 It is expected that the offices will develop internal procedures to ensure that the documents and communications referenced above will contain only previously approved requirements or staff positions.

having the action reviewed by CRGR. The analysis may be conducted either before or after the action is taken. However, The CRGR Chairman should be notified by the Office Director originating the action. These emergency-action immediately effective requirements will be reported to the Committee for information and will be included in the report to the Commission.

- D. For each proposed requirement or staff position not requiring emergency immediately effective action, the proposing office is to identify the requirement as either Category 1 or 2.

Category 1 requirements and staff positions are those which the proposing office rates as urgent to overcome a safety problem requiring immediate resolution or to comply with a legal requirement for immediate or near-term compliance. Category 1 items are expected to be infrequent and few in number, and they are to be reviewed routinely-approved or otherwise dealt with within 2-working days of receipt by the CRGR. If the appropriateness of designation as Category 1 is questioned by the CRGR Chairman, and if the question is not resolved within the 2 working-day limit, the proposed requirement or staff position is to be forwarded by the CRGR Chairman to the EDO for decision.

Category 2 requirements and staff positions are those which do not meet the criteria for designation as Category 1. These are to be scrutinized carefully by the CRGR on the basis of written justification, which must be submitted by the proposing office along with the proposed requirement

or staff position. Certain proposals may be exempted from CRGR review.  
Such exemptions will be determined by the CRGR Chairman, effected only  
after notice to the CRGR, and only on receiving no objection from the  
CRGR. Exemptions from review may be proposed by an office director on  
the following bases:

1. Decreases or relaxation in current staff positions which would have  
no significant detrimental effect on plant safety and would provide  
substantial cost savings for the NRC or industry.
2. Increases in current staff positions which would have no signifi-  
cant cost to NRC or industry, but which would provide a substantial  
additional overall increase in plant safety.

Upon notice to the members of the CRGR, and without objection, the CRGR Chairman may exempt any Category 2 proposal from review on the grounds that he concludes that it involves only an insignificant effect on the NRC staff and on licensees.

If the staff proposes that analysis and review of rulemaking proposals in accordance with 10 CFR 50.109 are to be waived by the Commission, a rationale for not reviewing the proposal in accordance with 10 CFR 50.109 shall be included in the rulemaking package.

Staff proposed generic modifications considered necessary to bring facilities into compliance with licenses or the rules or orders of

the Commission, or into conformance with written commitments by licensees, will not require analyses of the type described in Section IV(B)(vii). The proposed action shall be presented to the CRGR Chairman with an evaluation including a statement of the objectives of and reasons for the proposed requirement and the basis for excepting the proposed action from CRGR review.

E. The DEDROGR shall compile and maintain a list of projected generic requirements and staff positions based on input from the NRC offices. The CRGR may ~~will normally~~ receive an early briefing from the offices on the proposed new generic requirements and staff positions before the staff has developed the requirements and held discussions with the ACRS.

F. ~~The CRGR shall be consulted on the proposed backfit policy to be developed by the DEDROGR staff.~~

G. ~~The CRGR shall be consulted on the proposed plan to control communications with the licensees to be developed by DEDROGR staff.~~

H. F. The CRGR may be consulted on any issue deemed appropriate by the CRGR Chairman.

IV. CRGR OPERATING PROCEDURES

A. Meeting Notices

Meetings will generally be held at regular intervals and will be scheduled well in advance. Meeting notices will generally be issued by the CRGR Chairman 2 weeks in advance of each meeting, except for Category 1 items, with available background material on each item to be considered by the Committee.

B. Contents of Packages Submitted to CRGR

The following requirements apply for proposals to reduce existing requirements as well as proposals to increase requirements. Each package submitted to the CRGR for review shall include fifteen (15) copies of the following information:

- (i) The proposed generic requirement or staff position as it is proposed to be sent out to licensees.
- (ii) Draft staff papers or other underlying staff documents supporting the requirements or staff positions. (A copy of all materials referenced in the document shall be made available upon request to the DEDROGR staff. Any committee member may request DEDROGR staff to obtain a copy of any referenced material for his or her use.)

- viii (iii) Each proposed requirement or staff position shall contain the sponsoring office's position as to whether the proposal would increase requirements, or staff positions, implements existing regulations or goes-beyond-them, or staff positions, or would relax or reduce existing regulations or staff positions.
- viii (iv) The proposed method of implementation along with the concurrence (and any comments) of OELD on the method proposed.
- viii (v) Regulatory analyses as specified in NUREG/BR-0058, Revision 1, May 1984, Regulatory Analysis Guidelines of the U.S. NRC.  
~~analysis-sufficient-to-address-the-Paperwork-Reduction-Act, the Regulatory-Flexibility-Act-and-Executive-Order-12291,~~

(iii)--A-brief-description-of-each-of-the-steps-anticipated-that licensees-must-carry-out-in-order-to-complete-the-requirements,  
etc.

----Are-there-separate-short-term-and-long-term-requirements?

----Is-it-the-definitive,-comprehensive-position-on-the-subject-or is-it-the-first-of-a-series-of-requirements-to-be-issued-in-the-future?

----How-does-this-requirement-affect-other-requirements?--Does this-requirement-mean-that-other-items-or-systems-or-prior analyses-need-to-be-reassessed?

2--Is-it-only-computation?--Or-does-it-require-or-may-it-entail  
engineering-design-of-a-new-system-or-modification-of-any  
existing-systems?

2---What-plant-conditions-are-needed-to-install,-conduct-preopera-  
tional-tests-and-declare-operable?

2---Is-plant-shutdown-necessary?--How-long?

2---Does-design-need-NRC-approval?

2---Does-it-require-new-equipment?--Is-it-available-for-purchase  
in-sufficient-quantity-by-all-affected-licensees-or-must-such  
equipment-be-designed?--What-is-the-lead-time-for-availability?

2---May-it-be-used-upon-installation-or-does-it-need-staff-approval  
before-use?--Does-it-need-Tool-Spec-changes-before-use?

{iv} (vi) Identification of the category of reactors plants to which the generic requirement or staff position is to apply (that is, whether it is to apply to new plants only, new OLs only, OLs after a certain date, OLs before a certain date, all OLs, all plants under construction, all plants, all water reactors, all PWRs only, some vendor types, some vintage types such as BWR 6 and 4, jet pump and nonjet pump plants, etc.).

(vii) For each such category of reactor plants, the evaluation should also demonstrate how the action should be prioritized and scheduled in light of other ongoing regulatory activities. The evaluation is to consider information available concerning any of the following factors as may be appropriate and any other information relevant and material to the proposed action:

- (a) Statement of the specific objectives that the proposed action is designed to achieve;
- (b) General description of the activity that would be required by the licensee or applicant in order to complete the action;
- (c) Potential change in the risk to the public from the accidental offsite release of radioactive material;
- (d) Potential impact on radiological exposure of facility employees;
- (e) Installation and continuing costs associated with the action, including the cost of facility downtime or the cost of construction delay;
- (f) The potential safety impact of changes in plant or operational complexity, including the relationship to proposed and existing regulatory requirements and staff positions;

- (g) The estimated resource burden on the NRC associated with the proposed action and the availability of such resources;
  - (h) The potential impact of differences in facility type design or age on the relevancy and practicality of the proposed action;
  - (i) Whether the proposed action is interim or final, and if interim, the justification for imposing the proposed action on an interim basis.
- {v) (viii) For each evaluation conducted pursuant to 10 CFR 50.109, the proposing office director shall determine such-category-of-reactor,-the-following-information-should-be-provided based on the considerations of paragraphs (i) through (vii) above, whether:
- (a) the proposal would result in a substantial increase in the overall protection of public health and safety or the common defense and security; and
  - (b) the direct and indirect costs of implementation, for the facilities affected, are justified in view of this increased protection.
- (ix) For each evaluation conducted for proposed relaxation or decreases in current staff positions, the proposing office director shall

determine, based the considerations of paragraph (i) through (vii) above, whether:

(a) the proposal would result in any decrease in plant safety;  
and

(b) the proposal would result in substantial cost savings for the industry.

-----A risk reduction assessment performed using a data base and methodology commonly accepted within NRC (for example, similar to that outlined in SECY-81-512).

-----An assessment of costs to NRC, an assessment of costs to licensees, including resulting occupational dose increase or decrease, added plant and operational complexity, and total financial costs.

-----Consistent with the first two items above, provide the basis for requiring or permitting implementation by a given date or on a particular schedule.

-----Other acceptable implementation schedules and the basis therefor--this should include sufficient information to demonstrate that the schedules are realistic and provide

sufficient-time-for-in-depth-engineering-evaluations-design,  
procurement,-installation,-testing,-development-of-operating  
procedures,-and-training-of-operators.

-----Schedule-for-staff-actions-involved-in-completion-of-require-  
ment-(based-on-hypothesized-effective-date-of-approval)

-----Prioritization-of-the-proposed-requirement-considered-in-light  
of-all-other-safety-related-activities-under-way-at-all  
affected-facilities--This-prioritization-shall-be-based-upon  
the-guidance-and-direction-provided-from-time-to-time-by-the  
EDB--What-such-advice-is-provided,-each-preposing-office  
shall-use-its-best-technical-judgment-and-explain-the-basis  
therefor.

-----For-proposed-requirements-involving-reports-and/or  
recordkeeping,-an-assessment-of-whether-such-reporting-or  
recordkeeping-is-the-best-means-of-implementation-and-the  
appropriate-degree-of-formality-and-detail-to-be-imposed.

-----To-the-extent-that-the-category-contains-plants-of-different  
types-of-vintages,-the-items-listed-above-shall-be-provided  
for-each-type-and-vintage,-or-justification-shall-be-provided  
demonstrating-that-the-analysis-of-each-item-is-valid-for-all  
types-and-vintages-covered.

C. DEDROGR Staff Review

DEDROGR staff shall review each package for completeness. If the package is not sufficient for CRGR consideration, it shall be returned by DEDROGR to the originating office with reasons for such action. Prior notice to the Committee is not needed; however, CRGR members shall be informed of such actions.

- An accepted package shall be scheduled for CRGR consideration; however, scheduling priorities shall be at the discretion of the CRGR Chairman.
- All requests for particular scheduling shall be made to the CRGR Chairman.
- The DEDROGR staff may obtain additional information from industry and consultants on such proposals, particularly with respect to the cost of implementation, realistic schedule for implementation, and the ability of licensees to safely and efficiently carry out the full range of safety-related activities at each facility while implementing the proposed requirement or staff position. The DEDROGR staff normally shall provide a brief summary analysis of each package to CRGR members prior to the meetings.

D. CRGR Meeting Minutes

At each meeting, for each package scheduled for discussion, the sponsoring office shall present to the CRGR the proposed generic requirement or staff position and respond to comments and questions. A reasonable amount of time, within the discretion of the CRGR Chairman, shall be permitted for discussion of each item by Committee members. At the conclusion of the discussion, each Committee member shall summarize his position. The minutes of each meeting, including CRGR recommendations and the bases therefor shall be prepared. Minutes normally shall be circulated to all members within 5-working days after the the meeting, and each member shall have 5-working days to comment in writing on the minutes. It is the responsibility of each member to assure that the minutes accurately reflect his views. All comments received within that period shall be part of the minutes of the meeting.

The ~~Chairman~~ shall recommend to the EDO, approval, disapproval, modification, or conditioning of generic requirements considered by the Committee, as well as the method of implementation of such requirements or staff positions and appropriate scheduling for such implementation, which shall give consideration to the ability of licensees to safely and efficiently carry out the entire range of safety-related activities at each facility. The minutes shall give an accurate description of the basis for the recommendations and shall accurately reflect the consensus decision of the Committee. Copies of the minutes shall be distributed

to the Commission, Office Directors, Regional Administrators, CRGR Members, and the Public Document Room. The EDO's action taken in response to the Committee's recommendations shall be provided in writing to the Commission.

E. Recordkeeping System

The DEDROGR staff will assure that there is an archival system for keeping records of all packages submitted to DEDROGR, actions by the staff, summary minutes of CRGR consideration of each package including corrections, recommendations by the Committee, and decisions by the EDO.

V. REPORTING REQUIREMENTS

The DEDROGR staff shall prepare a report to be submitted by the EDO to the Commission each month. The report will provide a brief summary of CRGR activities, including a list of all items that have been sent to the CRGR and their current status. The report shall be distributed to CRGR Members, Office Directors, Regional Administrators and the Public Document Room.

ATTACHMENT 1 TO  
CRGR CHARTER  
MARCH 13, 1986  
REVISION 2

NEW GENERIC REQUIREMENT AND STAFF POSITION REVIEW PROCESS

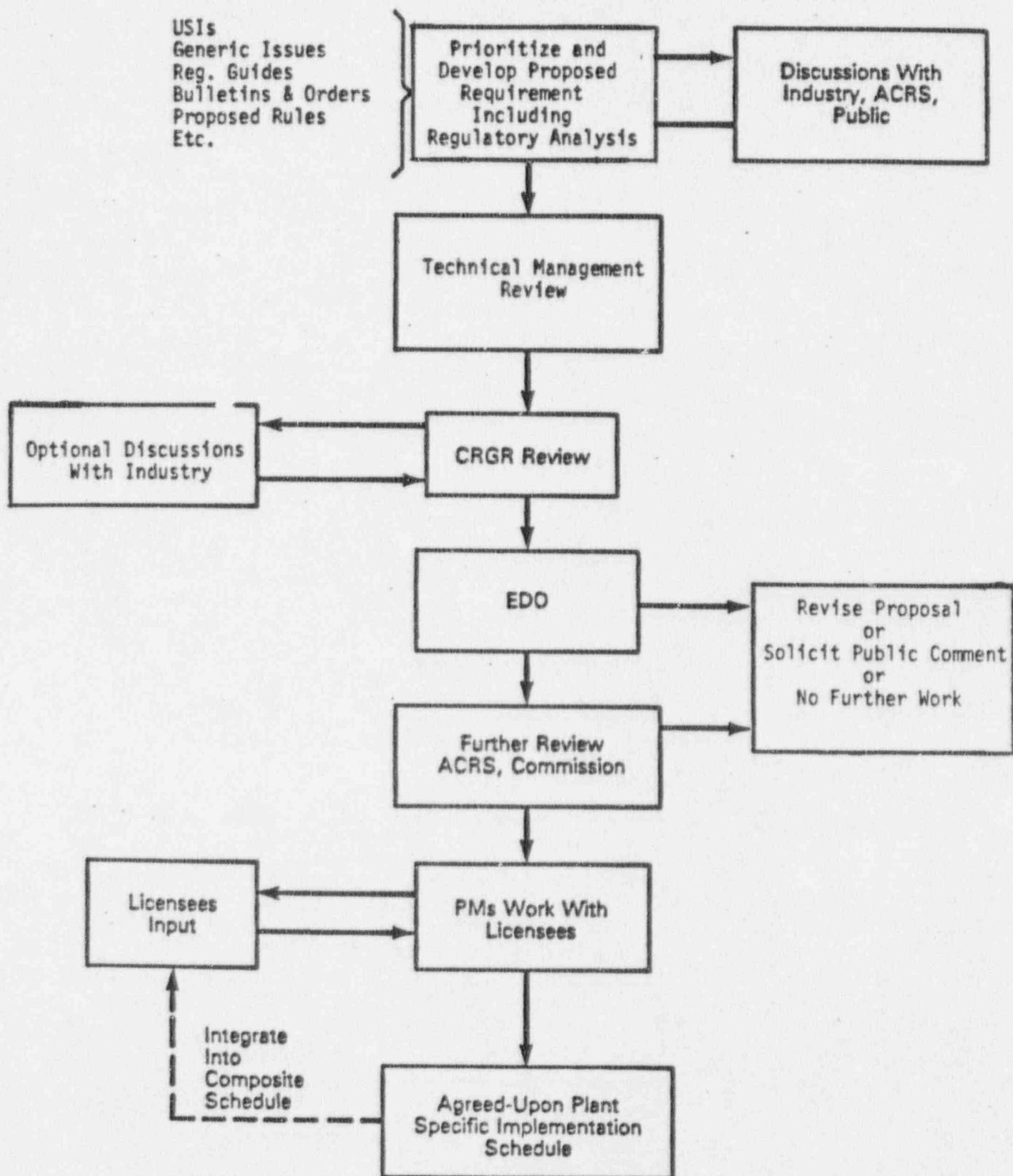
The attached chart is a schematic representation of how new generic requirements and staff positions are developed, revised and implemented under-the-new-system.

In the early stages of developing a proposed new requirement or staff position, it is contemplated that the staff may have discussions with the industry, ACRS and the public to obtain preliminary information of the costs and safety benefits of the proposed action. On the basis of this information, the proposing office will prepare the package for CRGR review.

The CRGR may recommend approval, revision, or disapproval or that further public comment be sought. After CRGR and EDO approval, there may be further review by the ACRS or the Commission. Decisions by the Commission are controlling.

Once final approval is received, the individual project managers will normally work with each licensee to develop a plant-specific implementation schedule taking into consideration all of the other requirements and staff positions that are being implemented at each plant.

# SCHEMATIC REPRESENTATION OF NEW REQUIREMENTS REVIEW



PROCEDURES TO CONTROL COMMUNICATION  
OF GENERIC REQUIREMENTS AND STAFF POSITIONS TO REACTOR LICENSEES

A. Background

In a memorandum from the Chairman to the Executive Director for Operations dated October 8, 1981, the Commission expressed concern over conflicting or inconsistent directives and requests to reactor licensees from various components of the NRC staff. By that memorandum, the Commission outlined certain recommended actions to establish control over the number and nature of requirements placed by NRC on reactor licensees. These included: establishing a Committee to Review Generic Requirements (CRGR); establishing a new position of Deputy Executive Director for Regional Operations and Generic Requirements (DEDROGR); conducting a survey of formal and informal mechanisms to communicate with reactor licensees; and developing and implementing procedures for controlling communications involving significant requirements covering one or more classes of reactors. The following procedures have been established for controlling communications with reactor licensees which impose or purport to express generic requirements or staff positions of NRC and are designed to implement the provisions of 10 CFR 50.109, 50.54(f) and 2.204.

B. Committee to Review Generic Requirements (CRGR)

Except for emergency situations, the CRGR shall review all proposed new generic requirements and staff positions to be imposed on one or more classes of power

reactors in accordance with the Charter of the Committee, before such proposed requirements or staff positions are forwarded to the EDO and Commission and imposed on, or communicated for use or guidance to, any reactor licensee.

C. Office Responsibility

Each office shall develop internal procedures to assure that the following policy requirements regarding reactor licensees are carried out:

- (1) All proposed generic requirements and staff positions (Table I attached) shall be submitted for CRGR review. Such submittals shall conform to the provisions of the CRGR Charter relating to the contents of such submittals.
- (2) All generic documents, letters and communications that establish, reflect or interpret NRC staff positions or requirements (Table II attached) shall be submitted for review by CRGR unless these documents refer only to requirements or staff positions approved prior to November 12, 1981. In the latter case, the previously approved requirement or staff position should be specifically cited and accurately stated. Offices should be careful to review new or specific interpretations to assure that they are only case-specific applications of existing requirements rather than initial applications having potential generic use. Case-specific applications are governed by NRC Manual Chapter 0514.
- (3) For all other communications with licensees (Table III, attached), no statements shall be used that might suggest new or revised generic

requirements, staff positions, guidance or recommendations unless such statements have been approved by the EDO or the Commission.

- (4) In developing a proposed new generic requirement or staff position for CRGR review, an office may determine that it is in possession of important safety information that should be made available to licensees. It is the responsibility of that office to take immediate action to assure that such information is communicated to the licensees by the appropriate office. Such actions may be taken before completion of any proposed or ongoing CRGR reviews.

D. Emergency Action

For those rare instances where it is judged that an emergency action is needed to protect the health and safety of the public, no review by the CRGR is necessary. However, the DEDROGR, who is Chairman of the CRGR, shall be notified by the office originating the action. These emergency actions shall be reported to the Commission.

TABLE I

PRINCIPAL MECHANISMS USED BY NRC STAFF TO  
ESTABLISH OR COMMUNICATE GENERIC REQUIREMENTS AND STAFF POSITIONS

Rulemaking<sup>1</sup>

Advanced Notices  
Proposed Notices  
Final Rules  
Policy Statements

Other Formal Requirements<sup>2</sup>

Multiplant orders including show cause orders and  
confirmatory orders

Staff Positions<sup>3</sup>

Bulletins  
Circulars  
Multiplant letters (including 10 CFR 50.54f and TMI Action  
Plan letters)  
Regulatory Guides  
SRP (including Branch Technical Positions)  
Standard Tech Specs  
USI NUREGs

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1 While Rulemaking is an action of the Commission rather than the staff, most rules are proposed or prepared by the staff.

2 The document itself imposes a legal requirement; e.g., regulatory orders license conditions.

3 Documents that reflect staff positions which, unless complied with or a satisfactory alternative offered, the staff would impose or seek to have imposed by formal requirement.

TABLE II

MECHANISMS OFTEN USED TO INTERPRET GENERIC REQUIREMENTS OR STAFF POSITIONS

Action and Petitions for Rulemaking

Action on 10 CFR 2.206 Requests

Approval of Topicals

Facility Licenses and Amendments

SERs

FDAs, PDAs

I&E Manual

I&E (HQ) Positions

NUREG Reports (other than USIs)

Operator Licenses and Amendments

Single Plant Orders

Staff Positions on Code Committees

Unresolved Issues Resulting from Inspections

TABLE III

ADDITIONAL MECHANISMS SOMETIMES USED TO COMMUNICATE  
GENERIC REQUIREMENTS OR STAFF POSITIONS

DES & FES

Entry, Exit and Management Meetings

Information Notices

Licensee Event Reports; Construction Deficiency Reports (Sent to Other Licensees)

NRC Operator Licensing People Contact with Licensees

Phone Calls or Site Visits by NRC Staff or Commission to Obtain Information (i.e., Corrective Actions, Schedules, Conduct Surveys, etc.)

Pleadings

Preliminary Notifications

Press Releases

Proposed Findings

Public Meetings, Workshops, Technical Discussions

Resident Inspector Day-to-Day Contact

SALP Reports

SECY Papers (Some Utilities Apparently Sent Operators to College Based on Recent SECY Paper on Operator Qualifications)

Special Reports

Speeches to Local Groups or Industry Associations

Technical Specifications

Telephone Calls and Meetings with Licensees, Vendors, Industry Representatives, Owners Groups

Testimony