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Donald C. Hintz

January 28, 1991

Mr. Samuel J. Chilk  
Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

ATTENTION: Docketing and Service Branch

Subject: Comments on SECY-90-347, "Regulatory Impact Survey Report"

ENRO-91/00001

Dear Mr. Chilk:

PURPOSE

These comments are submitted by Entergy Operations, Inc. in response to the Nuclear Regulatory Commission (NRC) request for comment on its SECY-90-347 "Regulatory Impact Survey Report." (55 Federal Register 3220, dated December 27, 1990).

SECY-90-347, GOOD INITIAL EFFORT

Entergy Operations commends the NRC and its staff for the initiative taken in seeking industry (and regulatory staff) perceptions of the impact of NRC activities on the safe operations of nuclear power plants. The proposed NRC actions outlined in SECY-90-347 clearly reflect good faith consideration given by the NRC to industry comments and concerns provided as part of the NRC's Regulatory Impact Survey (RIS) effort.

On net, Entergy Operations agrees with the proposed evolutionary refinements of programs and processes that are associated with the three principal issue areas, as characterized by the NRC in SECY-90-347. Further, we believe that successful application of those refinements, with appropriate consideration of comments provided in this submittal and by the Nuclear Management and Resources Council, Inc. (NUMARC) on this subject, can create an environment more conducive to effective NRC/licensee interface and improved management of both NRC and industry resources.

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#### ADDRESSING THE SOURCE(S) OF INCREASED REGULATORY BURDEN

Enclosure 1 of SECY-90-347 focuses on the recurring survey response theme of "the quantity of NRC requirements." Section 1.A goes on to note some underlying issues which we at Entergy Operations generally agree with. However, the actions proposed by the NRC shift directly to managing the burden as opposed to effectively addressing what created the burden, what continues to create the burden, and whether that burden is proper and fully consistent with the public health and safety and the nation's best interest regarding future energy needs.

In fairness to the NRC proposed actions, some of the measures considered and proposed in Enclosure 3, do partially approach the issue of what creates the burden, e.g., backfit training for NRC Staff can help to curb unauthorized imposition of informal requirements. However, in large part, it does seem that the underlying root causes that give rise to regulatory burden have not been properly investigated, identified, or discussed, at least by our reading and understanding of SECY-90-347.

In the simplest terms we may, through these and other efforts, vastly improve our recognition and management of the cumulative burden of regulatory requirements, generic and plant specific. However, we may find that the level of burden, however well managed, is not compatible with resources available. This does not mean safety is or will be compromised. It simply means that in the end, our jointly available resources may not be used effectively. In some cases, for some licensees, this will significantly detract from its resolve to continue with the nuclear option and will certainly impact future energy source selections.

#### EFFECTIVE COMMUNICATIONS

The investigation as to the cause of increased regulatory burden and the management of that burden can not be separated from an assessment of the quality of communications between the NRC Staff and licensees. The NRC cites in SECY-90-347 that its evaluation identified several recurring themes that in some way involve licensee decisions to acquiesce to NRC formal or informal requests.

In presentation and remarks made by Entergy Operations staff at the NRC-NUMARC workshop on the Backfit Rule (Region II, Atlanta, September 27, 1990), we indicated the industry must recognize its responsibility to work with the NRC to address the poor quality of NRC-licensee communications. Licensees not only must be able to competently speak to the safety significance of an issue but also be able and willing to engage in frank, open discussion with the NRC on cost impact, cost/benefit concerns, the application of backfit requirements, etc.

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Summary themes, Items 1 and 4 of SECY-90-347, highlight the tendency of licensees to acquiesce to NRC requests. However, the proposed NRC actions in the SECY report appear to neither identify nor address the factors underlying this failure of the NRC and industry to engage in open, balanced communications on regulatory issues and their impact.

For whatever reasons, these type of communications are not occurring as a matter of practice. It is the joint responsibility of the NRC and the industry to address and solve this problem.

#### NEED FOR FURTHER ROOT CAUSE ASSESSMENT

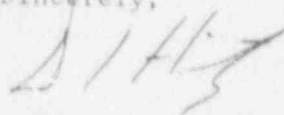
For these reasons, we at Entergy Operations strongly encourage the NRC to pursue further root cause assessments of the issues revealed in the various surveys conducted. The objective of this effort would be to further identify those key factors that give rise to the creation of regulatory requirements and to confirm that adequate controls and analysis are applied to these sources. By this we can ensure that true, significant safety benefit is realized per unit of implementation cost incurred.

In fact both the NRC and the industry are quite experienced in this process of problem evaluation. It is generally the same as that used in the development and assessment of corrective actions designed to address plant deficiencies, programmatic findings from audits, inspection findings, diagnostic evaluations, etc. Further, since it's clearly in the best interest of the NRC and the industry to solve these problems, it seems logical that the NRC should solicit industry input on its view of root causes, causal factors, and improvement actions. The SECY-90-347 effort represents a good start at this process. It does appear, as listed above, and in the NUMARC comments on SECY-90-347, that there are issues that are, as yet, not fully addressed.

#### COOPERATION WITH NUMARC AND INDUSTRY ENCOURAGED

We endorse the NUMARC comments on SECY-90-347 and strongly recommend that the NRC work with NUMARC and the industry as suggested in the NUMARC letter of May 14, 1990 to bring our collective talents to bear on these issues and on the ultimate goal of making the U.S. a world class nuclear performer.

Sincerely,



JC/mp  
attachment  
cc: (See next page)

J15JGC4/JNSFLR-3

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cc: Mr. T. W. Alexion  
Mr. S. E. Ebnetter  
Mr. L. L. Kintner  
Mr. Byron Lee, Jr.  
Mr. R. D. Martin  
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SECY-90-347 Review & Comment: Specific Comments on SECY-90-347 Enclosures

1. Managing the Cumulative Effect of the NRC's Generic Requirements and Communications

1. Control of Generic Requirements

The NRC discusses in Section 1.B. the role of CRGR. It has been our experiences that CRGR's effectiveness has been limited because of the following problems.

- a. Several routes exist for the NRC Staff to take positions that have generic implications, however, do not require CRGR action or involvement. Some examples of this are: (1) positions published in NRC Inspection Manual Part 9900, (2) draft Part 9900 positions circulated among Resident Inspectors with an implied authority that the unsigned documents somehow represent official NRC Staff positions, (3) formal letters to individual licensees on subjects with clear generic implications and subsequently utilized by NRC Staff as established Commission positions, and (4) various internal NRC position papers intended to clarify and/or interpret regulations or to support training of NRC Staff.

This is not a comprehensive listing. Clearly, all such routes should be identified, evaluated as to whether or not CRGR (or other NRC management) should be involved, and appropriate guidance and training established.

- b. Often a generic requirement document is issued, as is understandable, prior to some important aspects (or difficulties) in implementation being identified or fully understood by either the NRC or the licensee. Often the burden for interpretative guidance falls to the NRC Staff, principally the Project Manager. This gives rise to widely varying standards applied. Further, there appears no method or process in place for CRGR (or other NRC Management) to assess consistency or effectiveness of implementation for the generic requirement. Some generic letters take several years to implement. Over that time, without some attempt at consistency of standard, the results achieved by the generic letter can vary widely.

2. Inefficient Technical Reviews

One factor contributing to increased regulatory burden is the efficiency of the technical review provided by the NRC Staff. Occasionally Entergy Operations plants have experienced the change of technical reviewer staff while the review is in progress. We certainly recognize that this is often unavoidable. However, we do not note that the Staff takes any particular actions to mitigate the inefficiencies that may arise from dealing with a new reviewer. A reviewer change often results in longer

reviews and the frustrating return to some issues that were considered to be resolved. In some cases we find that final SERs, as generated by the "new reviewer" have new and significant items that were not anticipated and perhaps could have been addressed and resolved differently.

We recommend that the Staff avoid reviewer changes to the extent practical while the review is in progress. Further, we encourage the NRC to work with licensees to adopt some general guidelines to assist such a transition, to document interim agreements, and to minimize any adverse impact on both the NRC and licensees.

While reviewer changes can introduce inefficiencies (and added NRC review costs) to the review activity, a licensee has little control over the additional review or costs that result. Therefore, the NRC should consider providing the licensee some appropriate amount of credit under such circumstances.

3. Adequacy of "Systematic Communication Avenues"

- a. The NRC noted under "Generic Issues Management" two systematic communication avenues for obtaining "industry input regarding safety significance." Neither "avenue" cited by the NRC is considered to be an effective mechanism for receiving and utilizing "industry inputs." Often the analyses and other underlying bases for these issues are not made available to licensees for review and evaluation of safety importance.
- b. The NRC noted that the two avenues provide for industry input on safety significance. The NRC is encouraged to seek industry input on aspects much broader than safety significance. Certainly, the assessment of safety significance is of keen importance in that, on the basis of that assessment, the determination of priority and resource requirements on the part of both the NRC and the industry can be made. Following that determination industry input can be valuable in ensuring proper definition of the problem and assist in practical, effective actions to address the issue.

We, therefore, encourage effective communications and cooperative participation on these issues between the NRC and industry in the developmental stages of a requirement or NRC position. In this manner a cooperative effort can facilitate the identification and implementation of significant safety benefit through cost effective actions. This has happened to some degree in recent years, but the issues prioritized and approached in this way remain in the minority.

- c. Schedules presented in these NRC "avenues" regarding NRC action are not stable, often given to delays, and therefore make it difficult for licensees to line up proper resources to efficiently and effectively address the issue. More accurate schedule information and/or improved communications on project status, perhaps through NUMARC, could assist licensees in better anticipation of resource needs to address these issues when finalized by the NRC.

4. Regulatory Analysis Guidelines

- a. We overall agree with the NRC intent to revise the guidelines for regulatory analysis (NUREG/BR-0058) and for value-impact assessment (NUREG/CR-3568) and look forward to the opportunity to provide comment on the revised guidance.
- b. We strongly encourage consideration of NUMARC criticisms of NUREG/CR-3568, as provided in the NUMARC comments filed regarding SECY-90-347.

Regarding onsite costs of regulation, the Staff should restrict itself to comparing the actual costs of implementing a plant change against the safety benefit. Potential costs incurred from the postulated event should be a critical matter included in licensee management decisions but not in the regulatory process.

Utilities face the challenge of continued escalation of nuclear operating and maintenance costs and at the same time must competently and effectively discharge their responsibilities regarding the protection of public health and safety. Inherent to any plan, such as SECY-90-347, that intends to improve the regulatory/industry interface, and the regulatory process in general, must have an effective and efficient means of assessing cost/benefit for a given improvement. Simply, the industry should indeed pursue those improvements in physical plant and procedures that deliver substantial safety benefit and are, at the same time, cost effective to implement. Thus, our techniques for making these cost/benefit assessments must be sound and reasonable.

These techniques are critical to our decision making process and are vital to proper management of both NRC and industry resources. And, given the significant economic challenges nuclear utilities face, we believe that our joint ability (NRC and industry) to make and agree upon accurate cost/benefit decisions may well contribute significantly to the overall viability of the nuclear option in this country.

5. Participation in Plant Specific Programs

The NRC may have overlooked another reason for the lack of licensee enthusiasm for ISAP, namely uncertainty as to how consistently the NRC would permit issues to be resolved via an IPE type (PRA based) process. On several occasions Entergy Operations plants have experienced situations where delays on plant modifications, to allow a detailed assessment under IPE, were not allowed. This NRC decision was made in spite of the likelihood that a PRA evaluation would reveal that the subject modifications produced negligible safety benefit.

Substantial industry effort is now being put forward toward the implementation of PRA based analysis capability. We strongly encourage the development and refinement of this technology and the NRC's review and acceptance of it as a meaningful, credible tool in the regulatory decision making process.

6. Integrated Regulatory Requirements Implementation Schedule (IRRIS)

- a. We view the IRRIS as a concept with the potential to remedy some concerns regarding the cumulative impact of regulation. Some important points require clarification to support confidence in its overall effectiveness. The pilot program approach appears proper given the level of detail on IRRIS available at this point. Criteria and guidelines governing the IRRIS should be developed in a cooperative effort with the industry. This not only would draw in industry input and expertise, but could facilitate greater industry participation once finalized. The criteria and guidelines, as well as pilot program progress and conclusions, should be made available for public comment.
- b. We note that the NRC expects that criteria and guidelines for IRRIS can be established within two years. For those utilities that currently have substantial improvement programs (or a similarly large regulatory workscope component), the IRRIS may not provide timely relief. During improvement program implementation it often becomes very difficult to deliver tasks on committed schedules due to the continual addition of items from the "normal" regulatory process.
  - (1.) Utilities under the special circumstances of an unusually high regulatory workload should be given the opportunity to work with the NRC to develop an interim IRRIS type concept to the extent that date extensions do not take an inordinate amount of justification. Date extensions should be considered and evaluated in an efficient process, given proper assessment of safety significance and resource availability. It must be recognized and accommodated that new issues do arise and may well dictate a revision to priority assignments and work order.
  - (2.) Date extensions should be assessed on the individual merit of the issue and circumstances involved and should not have negative impact on the SALP evaluation.
- c. The two year period to develop scheduling criteria seems excessive. This may be due, in part, to the approach chosen to develop the criteria - i.e., the pilot plant licensees will individually establish criteria with NRR. Such an approach may suffer from lack of integration, be too plant-specific and not receive wide industry input or support. An approach which would be more coordinated and perhaps more timely would involve working through an industry group such as NUMARC to establish a draft set of criteria which could receive wide industry input and review, and then the application of those criteria to pilot plants for fine tuning.
- d. The review period (1 year prior to refueling) for IRRIS is not sufficient. Design and procurement lead times for major activities often exceed one year. It is also not clear whether the one year refers to the start of the review process or the end. Since the licensee must wait up to 90 days for an NRC response in order to



consider the proposed schedules acceptable, lead time is reduced to 9 months if the review period begins 1 year prior to refueling. Licensees will likely reject IRRIS on this basis alone. An acceptable review period should begin 18 months prior to the start of a refueling outage with a mandated maximum review time for the Staff of 3 months.

- e. The items on the IRRIS list "... will not include those actions that have been imposed to meet adequate protection standards or to attain compliance with existing NRC regulations. NRC imposed actions on the list will be those which provide substantial additional protection in accordance with 10CFR50.109." This statement is not sufficiently clear to promote confidence that the IRRIS process will be useful. Apparently, all modifications associated with a 10CFR requirement (e.g. the ATWS rule) will be excluded from IRRIS - this is reasonably clear. However, the reliance on backfit criteria raises a number of questions:
- (1.) Are generic letter "recommendations" equivalent to "NRC imposed actions ... which provide substantial additional protection..."? The NRC has consistently maintained that generic letter recommendations do not constitute requirements or imposed actions. If a licensee chooses to not accept a recommendation, will the recommendation be included in the list generated by the NRC? We recommend a definition that incorporates the idea of a licensee commitment in response to a generic communication?
  - (2.) Related to the above - generic communications such as bulletins and generic letters usually have some cost/benefit basis which supports the NRC's conclusion of "substantial additional protection" under the Backfit Rule. It is not unusual to find that when applying the generic recommendation to a particular plant, the cost/benefit basis changes radically from the generic evaluation. Simply because a generic conclusion has been reached on backfit does not mean that the safety benefit has been cost justified for a particular plant. [Actually, this discussion applies better to the point on who determines safety benefit, discussed below.]
  - (3.) Many plants still have unimplemented modifications which predate NRC's backfit evaluations. These are in the form of commitments, license conditions, etc. Will these be included in the IRRIS list? For instance, the GGNS license condition on neutron monitoring (stemming from the upgrade requirements of Revision 2 of Reg. Guide 1.97)? If not, the benefit of IRRIS would be greatly reduced.
- f. IRRIS will prioritize implementation schedules "... based upon safety significance..." and secondarily on cost and schedule concerns. Of prime concern in a program such as this is "Who will determine safety significance?" As discussed above, generic safety significance may have been assessed by the NRC, but application at

a particular plant may show negligible safety benefit. A good case in point is the Generic Letter 89-19 recommendation on high steam generator level feedwater trip for Waterford 3. Neutron monitoring for GGNS is another case in point. Safety significance can be more complex for long term implementation commitments, such as MOV testing. If valve testing priority is established at the beginning of the program such that high safety significant valves are addressed first, by the time we get to the end of the program, the remaining valves may have negligible significance.

For these questions of safety significance, the licensee will probably bear all the burden of justifying the safety significance level. NRR personnel, and the project managers in particular, will be relying on generic evaluations and are likely to demand technical justification tantamount to that required for exemption requests in order alter their perception of safety significance. If licensees cannot succeed in simple deferral of a generic letter "recommendation" to IPE resolution, the prospects for a rational approach to outage scheduling based on safety significance are probably poor. It will be necessary for the NRC to develop criteria that recognize plant specific differences from generic evaluations; allow for a lower threshold of "proof" than necessary for resolving a regulatory issue; and train NRC personnel appropriately.

- g. Certain NRC Staff have discouraged consideration of cost and scheduling difficulties on the part of the licensee, and in some instances, criticized the licensee for highlighting cost and schedule considerations. Incorporation of these criteria into IRRIS may be a fruitless undertaking without a significant commitment on the part of the NRC to train its staff on the criteria and maintaining management oversight of the process. This concern alone, if not addressed, would likely discourage industry participation in IRRIS.

## 2. Scheduling and Control of Inspections, Especially Team Inspections

### 1. "Team Inspection" Definition

Since a cap will be placed on the number of team inspections conducted during a SALP period, it may be worthwhile to more exactly define what a "team inspection" is.

### 2. Sensitivity to Impact of Refueling Outage on Licensee Resources

In scheduling team inspections, NRC guidance should be sensitive to the licensee's refueling outage schedule for inspections unrelated to outage activities. Inspections scheduled immediately following outages can be as burdensome as those scheduled during an outage for two reasons: 1) the outage end date is often determined by the amount of emergent work identified during the outage and may be extended to the point that the

outage overlaps the team inspection, and 2) plant and other personnel necessary to support the inspection team have just completed an extended period of long working hours and generally schedule time off following an outage. As a result a team inspection immediately following an outage can have an adverse effect on employee morale. Both of the above factors applied to the recently completed EDSFI at GGNS.

3. Consideration for Non-Inspection NRC Activities

The effect of major non-inspection NRC activities should also be considered in the scheduling and number of team inspections. Some licensees appear to receive an inordinate number of requests from the NRC (largely from NRR) to participate in voluntary research and information gathering activities that can result in resource impacts on the licensee which exceed those of a team inspection. For instance, GGNS is cooperating closely with Sandia National Labs in the long-term preparation of a PPA for low power and shutdown conditions. During the week of 1/14/91 alone, GGNS supported detailed discussions and plant walkdowns with 4 Sandia personnel and 2 NRR personnel. While Entergy Operations recognizes that the inspection role of the NRC must be fulfilled, we feel that some credit for extensive voluntary activities with the NRC should be given to offset the number of team inspections. In addition, it is not clear that these types of activities are included, or intended to be included, in MIPS.

4. Measurement of Effectiveness of NRR Programs and Impact on Licensee Activities

- a. We commend the NRC for the staff's expansion to cover assessment of NRR program effectiveness. And, as is typical in improvement programs, it is proper that the assessment of impact on licensee activities be an integral, routine part of NRC evaluations.
- b. In recent years the industry has made a number of shifts in the character and nature of audit and self-checking activities. One such shift was to move from compliance based quality audits to an assessment of effectiveness (e.g., of corrective action measures). This has proven to be both timely and necessary, but nevertheless, a difficult change to make.

In that the NRC intends on routinely gauging effectiveness, we recommend that the objectives of any audited NRR program or project be defined in a precise and auditable manner. Further, in that the NRC is seeking, in many cases, impact on licensee processes, we recommend that the NRC seek industry input on the criteria for effectiveness and impact assessments. Such discussions would not only aid and benefit the NRC assessments but also would likely continue to improve NRC-industry dialogue.

5. Availability of Master Inspection Planning System

- a. Coordination of NRC and licensee activities is a significant concern. We, therefore, encourage the development of the MIPS concept and its expeditious publishing.

- b. It is conceivable that the MIPS data could be made available electronically to licensees to facilitate a more effective analysis of its total resource burden and thus enable the licensee to better manage its resources. In concert with improved safety significance techniques, an enhanced, integrated picture of resource requirements could greatly aid in overall decisions regarding safety improvement and add some stability to work schedules.
6. Potential Duplication of Effort Regarding Inspection Follow-up System

Most, if not all licensees, already have in place some form of system that tracks not only inspection follow-up items but also commitments made in inspections. The NRC's proposed IFS may duplicate some aspects of those systems. To avoid inefficiency here, we recommend that the NRC publish for industry comment its objectives for having such a system and generally what details the NRC Staff now contemplates that such a system would do or contain.

### 1. Training, Preparation, and Management of NRC Staff

#### 1. Training and Rotation Plan for NRC Project Managers

The training plans for inspection personnel appear extensive, thorough and appropriate. However, given their importance and central role in licensee oversight and communications, Entergy Operations strongly supports a similar program for NRC Project Managers. We feel that there have been instances where an NRC Project Manager allowed personal opinion to overshadow his responsibilities to implement NRC policy such as contained in the PM Handbook, the Backfit Rule, etc. Proper training and management oversight could have alleviated some of these problems. In the same vein, Entergy Operations also supports a policy of rotation of NRC Project Managers similar to that for Resident Inspectors, and for the same reasons.

#### 2. Training Follow-up

An essential element of training is subsequent follow-up to assess the degree to which training has been absorbed and applied by the trainees. While the training discussed in SECY-90-347 appears appropriate, we feel that the program may be weak in assessing the effectiveness of that training. Entergy Operations continues to observe what we feel are misunderstandings on the part of NRC personnel in areas for which they have been trained (e.g. backfit). Simple questions such as "Has The Project Manager ever identified a plant-specific backfit and followed the appropriate process?" will go a long way to evaluating the quality of training being offered by the NRC.

#### 3. Professionalism Definition

We recommend that the NRC solicit industry input on some key characteristics of professionalism, in the context of regulatory-licensee interaction. In the recent years the industry has devoted considerable effort to the development of meaningful and understandable principles which embody professionalism in areas such as operations, maintenance,

management, etc. As you can expect, many themes repeat and are common to most areas. It seems that the NRC could approach the tasks outlined in Enclosure 3, Action C.2, much more efficiently by first seeking those standards and definitions already developed by utilities, NUMARC, and INPO.

4. Conduct of Inspection Team: Informal Inspector Comments

As part of Action C.2 on refining expectations for inspection staff regarding licensee interface, we encourage particular review of guidance to inspectors on comments that do not have a regulatory basis. During the course of inspections, NRC inspectors may and typically do pass on comments labeled as observations, concerns, weaknesses, etc. This is often valuable information and should be acted on based on the licensee's judgment. However, on occasion an inspector returns and attempts to follow-up on some of these types of comments. Information passed on by the inspector that is undocumented and involved no regulatory basis should be for the licensee's use only and represent no regulatory liability. We recommend that the NRC review its guidance on this aspect of inspection interface and modify its training, as needed.

5. Training Effectiveness and Ultimate Job Performance

As most training professionals recognize, testing after classroom training is a poor measure for how effective new skills have been learned or will be put into practice. Along this line we do commend staff intentions as stated in Action C.2 to review its expectations regarding job performance.

We commented above on apparent training (e.g., backfit area) that has little impact in day-to-day NRC-licensure interface. We also mentioned the need for increased management oversight. Expectations must be well defined and incorporated into "performance elements and standards" as is stated in Action C.2. To insure effective communications, the NRC states that "senior managers will conduct training on those expectations for inspectors and their supervisors." Time and time again, it is our experience that communicating performance expectations is important but unless expected performance standards are made part of the appraisal process then accountability for performance and for performance improvement is not achieved. That this is the NRC intent could be deduced from Action C.2; however, accountability for improvement is important enough to be re-emphasized.

6. And lastly, as commented earlier, the general theme of proposed actions in Enclosure 3 seems to focus largely on inspection staff. Clearly the same points on effective training, professionalism, accountability for performance and improvement apply broadly to all NRC staff.

#### 4. Comment Topic Areas

##### 1. Priority Assignment of NRC Programs: Industry Input

In Item 2, "NRC Licensing Activities," the NRC discusses one of the goals of the Technical Specification Improvement Program (TSIP). NRC expectations regarding TSIP are described more broadly in NUREG-1100 "Budget Estimates for Fiscal Year 1991." In discussing the basis for the proposed 1991 FY budget, the staff notes (p.3 of NUREG-1100) that it "believes (the TSIP) will improve operational safety and reduce the industry's regulatory burden."

We concur with the expectations for TSIP; however, we were surprised in the summer of 1990 when NRC elected to cancel scheduled meetings with Grand Gulf staff on the refinement of the (BWR/6) lead plant application of improved technical specifications. The cancellation was not only disruptive to our resource planning but also removed opportunities for an important working dialogue with the NRC staff. We were advised that the decision to cancel these meetings was made due to NRC resource constraints on the project and that other NRC objectives had or will have higher priority in FY 1991, e.g., licensing renewal and review of standard designs.

This experience illustrates the need for the NRC and industry to have some degree of dialogue on priorities for the coming year, giving appropriate consideration to safety benefit, as well as to projects that are intended to positively influence the management of regulatory burden. If such an assessment were applied to TSIP, we believe it would compete favorably for resources with high priority NRC staff activities such as standard design review and licensing renewal.