



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

"AE39-2"

Morris
Lohaus
Auluck

"PDR" pt

November 23, 1992

MEMORANDUM FOR: James M. Taylor
Executive Director for Operations

FROM: Edward L. Jordan, Chairman
Committee to Review Generic Requirements

SUBJECT: MINUTES OF CRGR MEETING NUMBER 230

The Committee to Review Generic Requirements (CRGR) met on Tuesday, October 6, 1992 from 8:00 a.m. to 12:30 a.m. A list of attendees at the meeting is enclosed (Enclosure 1). The following items were discussed at the meeting:

1. The CRGR reviewed a proposed amendment to 10 CFR Part 55 to amend operator requalification examination requirements. The Committee recommended in favor of issuing the proposed amendment for comment, subject to several modifications (to be coordinated with CRGR staff). This matter is discussed in Enclosure 2.
2. The CRGR reviewed a proposed generic letter on Thermo-Lag 330 Fire Barriers. The Committee recommended in favor of issuing the proposed letter, subject to a number of clarifying changes discussed with the staff at the meeting. The revised letter will be circulated to CRGR members prior to issuance. This matter is discussed in Enclosure 3.
3. The CRGR was briefed on a proposed amendment to 10 CFR Parts 40, 72, 74, 75, and 150 to require licensees to submit nuclear material transaction data in computer readable form. The Committee recommended that the staff consider requesting comment on three possible alternatives for this rule. This matter is discussed in Enclosure 4.

In accordance with the EDO's July 18, 1983 directive concerning "Feedback and Closure of CRGR Review," a written response is required from the cognizant office to report agreement or disagreement with CRGR recommendations in these minutes. The response is to be forwarded to the CRGR Chairman and if there is disagreement with CRGR recommendations, to the EDO for decision making.

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Attendance List
CRGR Meeting No. 230
October 6, 1992

CRGR Members

E. Jordan
F. Miraglia
J. Moore
B. Sheron
R. Bangart(for G. Arlotto)
W. Kane

CRGR Staff

J. Conran
G. Marino

NRC Staff

C. Thomas
R. Gallo
K. West
D. Lange
R. Auluck
P. Lohaus
B. Dean
J. Mitchell
C. McCracken
G. Holahan
M. Schwartz
R. Hoefling
R. Jenkins
R. Gramann
C. Emeigh

Enclosure 2 to the Minutes of CRGR Meeting No. 230
Proposed Amendment to 10 CFR Part 55 on Operator
Requalification Examination Requirements

October 6, 1992

TOPIC

P. Lohaus (NMSS) and R. Gallo (NRR) presented for CRGR review a proposed amendment to 10 CFR Part 55 to amend operator requalification examination requirements.

Copies of the handouts used by the staff in its presentations are provided in the Attachment to this enclosure.

BACKGROUND

The package submitted for CRGR review on this matter was transmitted by a memorandum dated September 29, 1992, C. J. Heltemes to E. L. Jordan: the review package included the following documents:

1. Commission Paper entitled "Proposed Amendments to 10 CFR Part 55 on Renewal of Licenses and Requalification."

Enclosure A - The Proposed Rule Change
Enclosure B - The Regulatory Analysis
2. CRGR Review package.

CONCLUSIONS/RECOMMENDATIONS

The CRGR endorsed issuing the proposed amendment, subject to the comments and modifications listed below.

1. The rationale provided for the proposed amendment (e.g., at p.2 of the Commission Paper) should give greater emphasis to the power reactor licensees' capability for assessment of program weaknesses on their own (in addition to the potential for overall cost savings). // Page 495
2. In the current form of the proposed rule, small licensees (e.g., research reactors) as well as the power reactor licensees appear to fall within the scope of the rule. CRGR members questioned whether small licensees can do their own requalification examinations. Staff should consider treating small licensees separately, e.g., by excluding them from the scope of this amendment, or making voluntary (rather than mandatory) for small licensees the provisions of the amendment. //
3. The Committee discussed with the staff whether a backfit analysis is required for this type of action (i.e., an amendment to Part 55). The staff noted that the question of applicability of 50.109 to Part 55 is currently under review by OGC. If OGC finds that Part 55 does not come under the backfit rule, the backfit analysis will be deleted from the //

OGC
Handed of 11/19/92

CRGR BRIEFING ON LICENSED OPERATOR REQUALIFICATION

October 6, 1992

**Paul H. Lohaus
Robert M. Gallo**

*Attachment to
Enclosure 2*

Enclosure 2 to the Minutes of CRGR Meeting No. 230
Proposed Amendment to 10 CFR Part 55 on Operator
Requalification Examination Requirements

October 6, 1992

TOPIC

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Enclosure B - The Regulatory Analysis

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OGC
Handout of NOV 19
1992.

package. If the backfit analysis is retained, it should be strengthened by additional discussion of actual examples or observations from experience that support the proposed action.

BACKFITTING AND SAFETY GOAL CONSIDERATIONS

The Committee believes that the proposed action is consistent with the Commission's Safety Goal Policy. See discussion regarding applicability of the backfit rule to Part 55 under Recommendation #3 above.

**CRGR BRIEFING ON LICENSED
OPERATOR REQUALIFICATION**

October 6, 1992

**Paul H. Lohaus
Robert M. Gallo**

Attachment to
Enclosure 2

RECOMMENDED CHANGES TO 10 CFR PART 55

- **Delete requirement for NRC to examine each operator for license renewal**
- **Add requirement that utility submit annual operating tests and biennial written examinations to NRC**
- **Include facility licensees in "Scope"**

LEGAL ISSUES

- **Statutory requirements will continue to be met**
 - **NRC will continue to actively oversee facility licensee requalification programs**
 - **Part 55 will continue to contain legally binding requirements for requalification examinations**

REVISED INSPECTION PROGRAM

- **Review exams**
- **On-site observations**
- **Monitor programmatic performance**
- **Advantages**

PROPOSED SCHEDULE

- **Proposed Rule to Commission** **11/30/92**
- **Proposed Rule Published** **01/15/93**
- **Public Comment Period Ends** **03/16/93**
- **Final Rule Published** **07/30/93**

Enclosure 3 to the Minutes of CRGR Meeting No. 230
Proposed Generic Letter on Thermo-Lag Fire Barriers

October 6, 1992

TOPIC

The proposed generic letter addresses the concerns and technical issues identified in the NRC Special Review Team report relating to use of the Thermo-Lag 330 fire barrier system in some operating nuclear power plants. The proposed letter requests information regarding licensees' evaluation and application of fire endurance and ampacity derating test results for the Thermo-Lag 330 material, and the as-built fire barrier configurations in the operating facilities that goes beyond the information requested in NRC Bulletin 92-01 and Bulletin 92-01, Supplement 1 issued earlier in the summer.

Copies of the handouts used by the staff to guide the presentations and discussions at this meeting are provided in the Attachment to this enclosure.

BACKGROUND

The package submitted for CRGR review on this matter was transmitted by a memorandum dated September 20, 1992, F. J. Miraglia Jr. to E. L. Jordan: the review package included the following documents:

1. Draft Generic Letter dated September 9, 1992;
2. CRGR Review Package;
[Staff responses to information requested in Section IV.B. of the CRGR Charter]
3. NRC Information Notice 92-46 dated June 23, 1992 (transmitting to licensees the Final Report of the Special Review Team for the Review of the Thermo-Lag Fire Barrier Performance, including appendices and attachments, as listed in the report);
4. NRC Action Plan for Resolution of Technical Issues on Thermo-Lag fire Barrier Systems, July 20, 1992 (included four attachments identified in transmittal memorandum);
5. NRC Staff Response to NUMARC's Comments on Draft Generic Letter 92-xx, "Thermo-Lag Fire Barriers";
6. NRC Staff Response to Thermal Science Incorporated's Comments on Draft Generic Letter 92-xx, "Thermo-Lag Fire Barriers";
7. NRC Staff Response to Comments (from NIRS, et al) on Draft Generic Letter 92-xx, "Thermo-Lag Fire Barriers".

CONCLUSIONS/RECOMMENDATIONS

The CRGR recommended in favor issuing the proposed Generic Letter, subject to the following changes and comments:

1. The generic letter should make clearer what additional information or action is being requested in the proposed Generic Letter beyond what was asked for in the previous bulletin and bulletin supplement, particularly with regard to the fire barrier installation/adequacy issues addressed in the earlier bulletin and bulletin supplement. It is not at all clear what incremental information the staff is requesting in these areas. The treatment of the ampacity derating issue in the proposed generic issue could also be improved. That issue was not addressed at all in the previous bulletin or bulletin supplement. The issue has safety significance because of the possible implications with regard to cable life; but it is distinct from the fire barrier installation and adequacy issues addressed in those earlier generic communications. This should be better explained and put into context more clearly in the proposed letter (i.e., the proposed generic letter is intended to address all of the issues and concerns identified for action in the NRC Special Review Team report, not just the fire barrier adequacy and installation issues addressed in the bulletin and bulletin supplement).
2. The staff should note explicitly, in IN format/language in the discussion portion of the proposed letter, that the NRC staff is also looking at other fire barrier systems in the light of concerns raised by the Thermo-Lag problems, and will determine whether similar regulatory action must be taken for those materials as well.
3. In items 1., 2.a., 2.b., and 2.c. under "Reporting Requirements", change the word "that" to "whether". Use of the word "that" in this context implies too strongly the imposition of requirements; "whether" is more appropriate in the context of a 50.54(f) information request.
4. In references to Thermo-Lag test data throughout the proposed letter, change the word "indeterminate" to "not verified" or "requiring further investigation."
5. On page 2, in the third line from the bottom, delete the term "core damage" and replace with "threat to public health and safety"; or delete the sentence altogether.

All changes to the draft letter will be coordinated with the CRGR staff, and the revised letter will be recirculated to all CRGR members, prior to issuance of the Generic Letter in final form to the licensees.

BACKFITTING AND SAFETY GOAL CONSIDERATIONS

The staff views the actions requested by the Generic Letter as necessary to bring licensees into compliance with existing fire protection requirements and commitments. The proposed action is, therefore, treated as a compliance

backfit. Safety goal considerations do not have to be addressed in the package for compliance actions.

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Presentation to the
COMMITTEE TO REVIEW GENERIC REQUIREMENTS

**PROPOSED GENERIC LETTER 92-XX
"THERMO-LAG 330-1 FIRE BARRIERS"**

Office of Nuclear Regulation
Division of Systems Safety and Analysis

October 6, 1992

Attachment to
Enclosure 3

GENERIC LETTER 92-XX

PURPOSE

TO OBTAIN INFORMATION NEEDED TO VERIFY THAT THE LICENSEES COMPLY WITH SECTION 50.48, "FIRE PROTECTION," GENERAL DESIGN CRITERIA (GDC) 3, "FIRE PROTECTION," AND GDC 17, "ELECTRIC POWER SYSTEMS," WHERE THERMO-LAG 330-1 BARRIERS ARE USED.

AREAS OF CONCERN FIRE ENDURANCE TESTING AND APPLICATION OF FIRE ENDURANCE TEST RESULTS.

AMPACITY DERATING TESTING AND APPLICATION OF AMPACITY DERATING TEST RESULTS.

BARRIER INSTALLATION.

ACTIONS

VERIFY THAT THERMO-LAG 330-1 BARRIERS MEET NRC REQUIREMENTS.

REPORTING

SUBMIT A WRITTEN REPORT THAT ADDRESSES THE USE OF THERMO-LAG 330-1 BARRIERS, TESTING, INSTALLATION, AND IDENTIFIES CORRECTIVE ACTIONS.

BACKFIT BASIS

COMPLIANCE BACKFIT.

NRC FIRE PROTECTION REQUIREMENTS FOR POWER REACTORS

ONE TRAIN OF SYSTEMS NEEDED TO SHUTDOWN THE PLANT MUST BE FREE OF FIRE DAMAGE FOLLOWING ANY FIRE IN THE PLANT. THIS IS DONE BY:

- SEPARATING REDUNDANT TRAINS BY A HORIZONTAL DISTANCE OF MORE THAN 20 FEET AND INSTALLING AUTOMATIC FIRE DETECTION AND SUPPRESSION IN THE FIRE AREA,

OR

- SEPARATING CABLES AND EQUIPMENT OF ONE REDUNDANT TRAIN BY A FIRE BARRIER WITH A 3-HOUR FIRE RATING,

OR

- ENCLOSING CABLES AND EQUIPMENT OF ONE REDUNDANT TRAIN IN A FIRE BARRIER HAVING A 1-HOUR FIRE RATING AND INSTALLING AUTOMATIC FIRE DETECTION AND SUPPRESSION IN THE FIRE AREA.

83 UNITS USE THERMO-LAG 330-1 FIRE BARRIERS TO SATISFY THE NRC'S REQUIREMENTS FOR 3-HOUR AND 1-HOUR FIRE BARRIERS.

NRC REQUIREMENTS FOR AMPACITY DERATING

GDC 17 REQUIRES THAT ONSITE ELECTRIC POWER SYSTEMS BE PROVIDED TO PERMIT FUNCTIONING OF STRUCTURES, SYSTEMS, AND COMPONENTS IMPORTANT TO SAFETY.

THE INSTITUTE OF ELECTRICAL AND ELECTRONICS ENGINEERS (IEEE) STANDARD 279, "CRITERIA FOR PROTECTION SYSTEMS FOR NUCLEAR POWER GENERATING STATIONS," PROVIDES GUIDANCE ON ACCEPTABLE METHODS OF SATISFYING GDC 17.

IEEE 279 STATES THAT THE QUALITY OF PROTECTION SYSTEM COMPONENTS SHALL BE ACHIEVED BY SPECIFYING REQUIREMENTS KNOWN TO PROMOTE HIGH QUALITY, SUCH AS THE REQUIREMENTS FOR THE DERATING OF COMPONENTS.

IEEE 279 REQUIRES THAT TYPE TEST DATA OR REASONABLE ENGINEERING EXTRAPOLATION BASED ON TEST DATA BE MADE AVAILABLE TO VERIFY THAT PROTECTION SYSTEM EQUIPMENT MEETS, ON A CONTINUING BASIS, THE PERFORMANCE REQUIREMENTS DETERMINED TO BE NECESSARY FOR ACHIEVING THE SYSTEM REQUIREMENTS.

THE NRC'S CONCERNS WITH THERMO-LAG 330-1 FIRE BARRIERS

AFTER AN EIGHT MONTH REVIEW, AN NRR REVIEW TEAM FOUND:

- THE FIRE RESISTANCE RATINGS AND THE AMPACITY DERATING FACTORS ARE INDETERMINATE.
- SOME LICENSEES HAVE NOT ADEQUATELY REVIEWED AND EVALUATED FIRE ENDURANCE TEST RESULTS AND AMPACITY DERATING TEST RESULTS TO DETERMINE THE VALIDITY OF THE TESTS AND THE APPLICABILITY OF THE RESULTS TO THEIR PLANT DESIGNS.
- SOME LICENSEES HAVE NOT ADEQUATELY REVIEWED INSTALLED FIRE BARRIER CONFIGURATIONS TO ENSURE THAT THEY EITHER REPLICATE THE TESTED CONFIGURATIONS OR PROVIDE AN EQUIVALENT LEVEL OF PROTECTION.
- SOME LICENSEES USED INADEQUATE OR INCOMPLETE INSTALLATION PROCEDURES DURING THE CONSTRUCTION OF THEIR THERMO-LAG BARRIERS.

THE REVIEW TEAM RECOMMENDED THAT THE STAFF ISSUE A GENERIC LETTER THAT DISCUSSES THE CONCERNS AND REQUIRES THE LICENSEES TO PROVIDE INFORMATION NEEDED BY THE STAFF TO VERIFY COMPLIANCE WITH 10 CFR 50.48, GDC 3, AND GDC 17.

DIFFERENCES BETWEEN PROPOSED GL 92-XX AND BULLETIN 92-01

BULLETIN 92-01 AND BULLETIN 92-01, SUPPLEMENT 1:

- INFORMED LICENSEES OF APPARENT FIRE ENDURANCE TEST FAILURES,
- ADDRESSED FIRE BARRIERS CONSTRUCTED USING *PREFABRICATED THERMO-LAG 330-1 PANELS AND CONDUIT SHAPES*,
- REQUIRED LICENSEES TO IMPLEMENT COMPENSATORY MEASURES.

PROPOSED GENERIC LETTER 92-XX:

- ADDRESSES BROADER CONCERNS OF COMPLIANCE WITH SPECIFIC NRC REQUIREMENTS.
- ADDRESSES THE USE OF THERMO-LAG BARRIERS TO ACHIEVE ELECTRICAL SEPARATION (I.E., REG GUIDE 1.75).
- ADDRESSES THE AMPACITY DERATING CONCERNS.
- COVERS THERMO-LAG BARRIERS OTHER THAN PREFABRICATED PANELS AND CONDUIT SHAPES SUCH AS THOSE CONSTRUCTED BY SPRAYING, BRUSHING, AND TROWELING ON THERMO-LAG MATERIAL.

THE ACTIONS REQUIRED BY GL 92-XX ARE CONSISTENT WITH THOSE REQUESTED BY BULLETIN 92-01 AND BULLETIN 92-01, SUPPLEMENT 1.

NRC ACTION PLAN

THE ISSUANCE OF THE PROPOSED GENERIC LETTER IS ONE ELEMENT OF NRR'S COMPREHENSIVE ACTION PLAN FOR RESOLVING A VARIETY OF ISSUES ASSOCIATED WITH THE USE OF THERMO-LAG 330-1 BARRIERS BY THE LICENSEES.

NRR'S ACTION PLAN HAS BEEN APPROVED BY THE DIRECTOR, NRR, AND REVIEWED BY THE EDO AND THE COMMISSION.

IN ADDITION TO THE PROPOSED GENERIC LETTER, THE ACTION PLAN INCLUDES:

- IDENTIFYING AND RESOLVING ALL TECHNICAL ISSUES, INCLUDING COORDINATING WITH INDUSTRY,
- PERFORMING FIRE ENDURANCE AND AMPACITY DERATING TESTS,
- DEVELOPING AN INSPECTION PROGRAM,
- PERFORMING A SELF-ASSESSMENT OF THE NRC'S FIRE PROTECTION PROGRAM FOR POWER REACTORS,
- EXPANDING THE SCOPE OF THE REVIEW TO OTHER FIRE BARRIERS. THESE BARRIERS MAY BE ADDRESSED IN A SUPPLEMENT TO THE PROPOSED GENERIC LETTER.

SAFETY SIGNIFICANCE

THE CONCERNS DO NOT PRESENT AN IMMEDIATE DANGER TO EITHER THE PUBLIC HEALTH AND SAFETY OR THE SAFETY OF THE NUCLEAR POWER PLANTS BECAUSE:

- TOTAL RELIANCE IS NOT PLACED ON THERMO-LAG. "DEFENSE-IN-DEPTH" ENSURES THAT PLANTS ARE EQUIPPED WITH OTHER PASSIVE AND ACTIVE FIRE PROTECTION FEATURES.
- RECENT NRC AND INDUSTRY FIRE TESTS HAVE DEMONSTRATED THAT THERMO-LAG DOES PROVIDE SOME LEVEL OF FIRE PROTECTION.
- LICENSEES HAVE IMPLEMENTED MEASURES, SUCH AS FIRE WATCHES, TO COMPENSATE FOR INOPERABLE THERMO-LAG BARRIERS.
- THE AMPACITY DERATING ISSUE IS PRIMARILY A CABLE AGING ISSUE. CABLE LIFE MAY BE REDUCED IF OPERATING TEMPERATURES ARE GREATER THAN DESIGN TEMPERATURES.

**GENERIC COMMUNICATIONS ISSUED
REGARDING THERMO-LAG 330-1 FIRE BARRIERS**

- Information Notice 91-47, "Failure of Thermo-Lag Fire Barrier Material To Pass Fire Endurance Test," August 6, 1991.
- Information Notice 91-79, "Deficiencies in the Procedures for Installing Thermo-Lag Fire Barrier Materials," December 6, 1991.
- Information Notice 92-46, "Thermo-Lag Fire Barrier Material Special Review Team Findings, Current Fire Endurance Tests, and Ampacity Calculation Errors," June 23, 1992.
- Information Notice 92-55, "Current Fire Endurance Test Results for Thermo-Lag Fire Barrier Material," July 27, 1992.
- NRC Bulletin 92-01, "Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling in Wide Cable Trays and Small Conduits Free From Fire Damage," June 26, 1992.
- NRC Bulletin 92-01, Supplement 1, "Failure of Thermo-Lag 330 Fire Barrier System to Perform its Specified Fire Endurance Function," August 28, 1992.

Enclosure 4 to the Minutes of CRGR Meeting No. 230
Briefing on a proposed Amendment to Require Licensees to
Submit Nuclear Material Transaction Data in Computer Readable Form

October 6, 1992

TOPIC

R. Gramann (NMSS) and C. Emeigh (NMSS) provided a briefing to CRGR on a proposed amendment to 10 CFR Parts 40, 72, 74, 75, and 150 to require licensees to submit nuclear material transaction data in computer readable form.

Copies of the handouts used by the staff in its presentations are provided in the Attachment to this enclosure.

BACKGROUND

1. The draft FRN for the proposed amendment was transmitted to CRGR by memorandum, dated September 11, 1992, R. Bernero to E. Jordan. The sponsoring office (NMSS) did not consider a formal review of this item by CRGR to be necessary felt there was no need for formal CRGR review of this item under the did not see the need for formal review by CRGR but offered although there was no need for further attention by the CRGR, the staff would keep the Committee fully informed on the progress of the rulemaking and offered to brief the Committee on the proposed changes.

CONCLUSIONS/RECOMMENDATIONS

The Committee recommended that the staff consider changes to the package prior to issuing the proposed amendment for comment, as indicated below:

1. The rulemaking notice and request for comments should include consideration of three options:
 - a. Option 1
The current proposal, i.e., mandatory submittal of nuclear material accounting data in computer readable form by all licensees (large and small) within the defined scope of the rule;
 - b. Option 2
A rule stating NRC's preference (along with a supporting rationale) that nuclear material accounting data be submitted in computer readable form, and permitting submittal in that format on a voluntary basis;

c. Option 3

A rule specifying mandatory submittal of computer readable data only by large fuel fabricators, and possibly the research reactors.

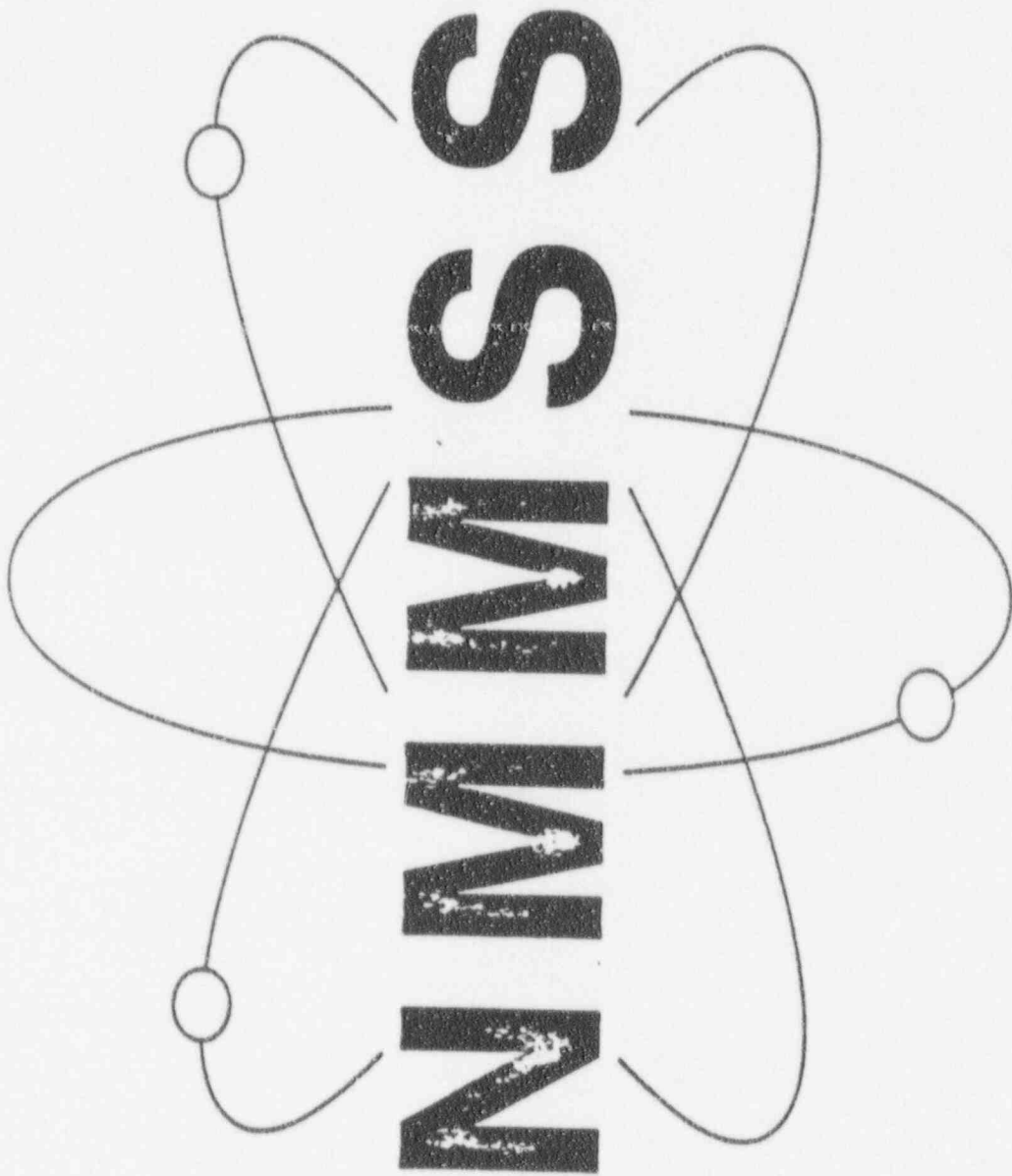
With regard to Options 2 and 3, the staff indicated that, because large fuel fabricators currently submit the bulk of the subject data and already own the computer equipment that would be needed, those licensees might reasonably be expected to voluntarily "comply" with submittal of data in the desired format, given a clear expression of NRC preference (and supporting rationale) in the context of a rule, e.g., as in Option 2. Further, because the research reactors typically also already own and use computers extensively, some of those licensees might also be expected to voluntarily submit data in the desired format under Option 2. Thus it appears that most of the expected savings could be realized with significantly reduced cost impact under Option 2, even if the other types of small licensees (who submit very few reports per year and likely do not already own/use a computer) do not submit data in the desired format. (A similar argument applies for Option 3, the difference being mandatory vs voluntary submittal of computer readable data by licensees the licensees affected.)

Public comment should be requested on these three alternatives. The exact demarcation criteria for including or not including licensees within the scope of the rule under Option 3 should be determined finally only after considering the comments of those potentially affected.

2. The staff should consider the possible copyright and antitrust implications of distributing to any licensee who requests it the software package to facilitate submittal of data in the requested format that was identified in the discussions with CRGR at this meeting. (The software is apparently compatible only with DOS-based computers.)

BACKFITTING AND SAFETY GOAL CONSIDERATIONS

The actions requested in the proposed rulemaking are for reporting purposes only. No backfit evaluation or safety goal comparison is needed.



NUCLEAR REGULATORY COMMISSION

**PROPOSED AMENDMENT TO 10 CFR
PARTS 40, 72, 74, 75, 150**

**TO REQUIRE CERTAIN LICENSEES TO SUBMIT
NUCLEAR MATERIAL TRANSACTION DATA
IN COMPUTER READABLE FORM**

**NUCLEAR MATERIALS MANAGEMENT
AND SAFEGUARDS SYSTEM**

(NMMSS)

o NMMSS BACKGROUND

What it is...

What it does...

Why it exists...

How it works...

o PROPOSED AMENDMENT

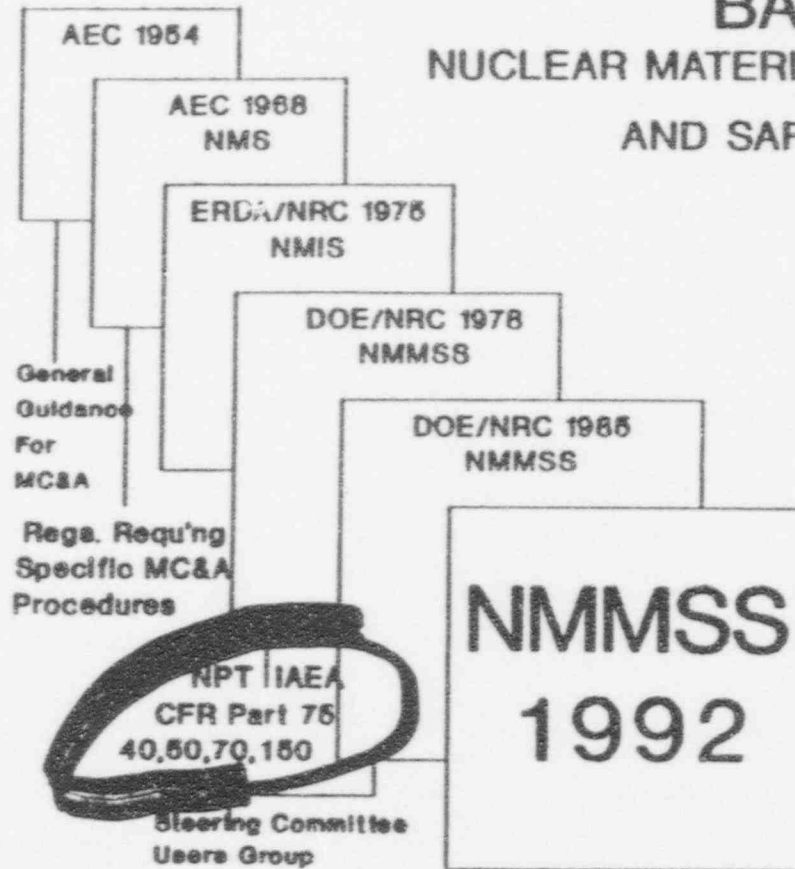
What it does...

Why we should do it...

What is the burden...

o SUMMARY

BACKGROUND NUCLEAR MATERIALS MANAGEMENT AND SAFEGUARDS SYSTEM



NMMSS

DOE and NRC Sponsored

What it is --

**U.S. GOVERNMENT'S AUTOMATED
MATERIAL ACCOUNTING PROGRAM**

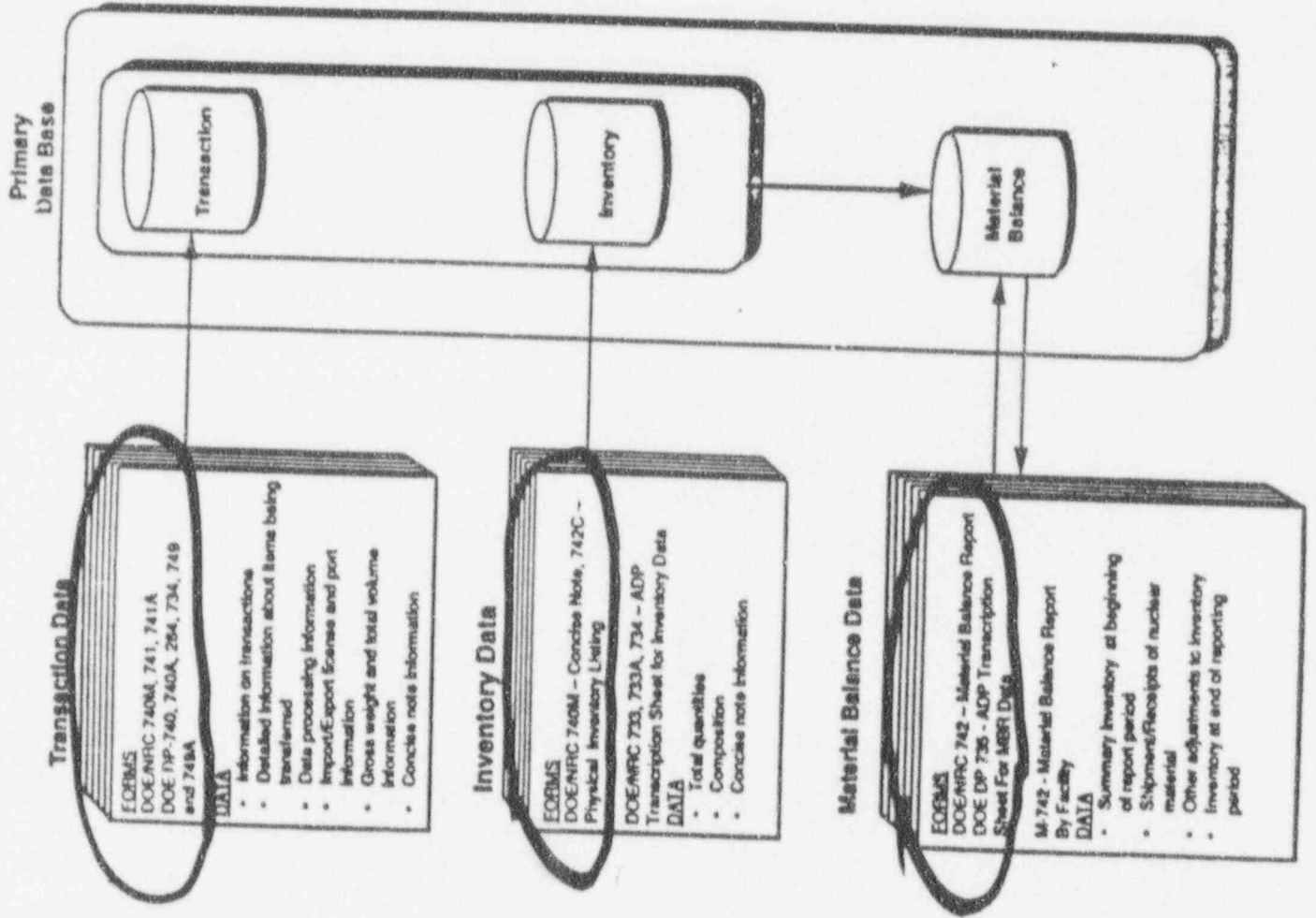
What it does --

**PROCESSES AND STORES NRC AND DOE
REQUIRED NUCLEAR MATERIAL DATA**

Why it exists --

**PROVIDES INFORMATION TO FULFILL
NATIONAL AND INTERNATIONAL NEEDS**

Data Base Inputs



NUCLEAR REGULATORY COMMISSION

**PROPOSED AMENDMENT TO 10 CFR
PARTS 40, 72, 74, 75, 150**

**TO REQUIRE CERTAIN LICENSEES TO SUBMIT
NUCLEAR MATERIAL TRANSACTION DATA
IN COMPUTER READABLE FORM**

U.S. DEPARTMENT OF ENERGY AND U.S. NUCLEAR REGULATORY COMMISSION
NUCLEAR MATERIAL TRANSACTION REPORT

1. SHIP RIS (1-4) XHF 5. PROC CODE (16)		2. REC RIS (5-8) XHF 6. RESERVED (17)		3. TRANS NO (9-14) 33 7. ACTION CODE (18) M		4. CORR NO (15) 8. DATA CODE (19)		PAGE 1 OF 1 PAGES										
9. A. SHIP B. LIC PSE&G PO BOX 236 HANCOCKS BRIDGE NJ 08038 C. ATT R.J. GENNONE D. TEL 609-339-5410			10. A. REC B. LIC PSE&G PO BOX 236 HANCOCKS BRIDGE NJ 08038 C. ATT R.J. GENNONE D. TEL 609-339-5410			11. DATA LINES 1(20-21) 6 13. A. SHIP FOR ACCT B. RIS 1(23-26)		12. NATURE TRANS 1(22) N 14. A. SHIP TO ACCT B. RIS 1(27-30)		NO DIST 1 MM 2 KP 3 NAW 4 BAP 5 6 7 8 9								
15. TRANSFER AUTHORITY 1(34-50)				16. EXPORT OR IMPORT TRANSFERS A. LICENSE NO 3(22-31) B. US PORT EXIT/ENTRY 3(32-35)														
17. MATERIAL TYPE AND DESCRIPTION CHANGE IN INVENTORY DUE TO PRODUCTION, DECAY AND FISSION				18. TRANS PROFILE A. B. CARRIER 1 3(36-39) 2 3(45-48) 3 3(54-57) 4 3(63-66) 5 3(72-75)			C. TRANS PT 3(40-44) 3(49-53) 3(58-62) 3(67-71)		19. PACKAGE IDENT A. MODEL ID 4(22-25) 4(29-32) 4(36-39) 4(43-46) 4(50-53)		B. NUMBER 4(26-28) 4(33-35) 4(40-42) 4(47-49) 4(54-56)		20. ACT DATE MO DA YR 1(70-75) A. SHIPMENT 09 30 89 B. SHIP CORR C. RECEIPT D. REC MEAS E. REC CORR					
21. A. MISCELLANEOUS B. CONC NOTE ATT Y N X C. CONC NOTE ATT Y N X				22. TOTAL GROSS WEIGHT 4(57-66)				23. TOTAL VOLUME 4(67-75)										
LINE	TYPE	IDENT	NO	PROJ	MAT	COMP	PROD	OWN	COUNTRY	KMP	GROSS	NET	ELEMENT	ELEMENT	WEIGHT%	ISOTOPE	ISOTOPE	
NO	INV	(BATCH)	ITEM	NUMB	TYPE	CODE	CODE	CODE	CONTROL	DATA	WEIGHT	WEIGHT	WEIGHT	LOE	ISOTOPE	WEIGHT	LOE	
2	20	2(22)	2(40)	2(44)	2(54)	2(56)	(60)	(61)	2(62)	2(70)			5(43)	5(54)	5(59)	5(65)	5(76)	
-21)	-23)	-39)	-43)	-53)	-55)	-59)			-69)	-75)			-53)	-58)	-64)	-75)	-80)	
A.	B.	C.	D.	E.	F.	G.	H.	I.	J.	K. + L.	M.	N.	O.	P.	Q.	R.	S.	
01	LN	BURNUP			20	309		J	USUS0000				159479		1.198	95437		
02	LN	BURNUP			20	309		J	CAUS0000				254784		2.661	157817		
03	NP	PRODUCTION			50	309		J	USUSUS00				41737		22.356	35234		
04	NP	PRODUCTION			50	309		J	CAUSUS00				64793		17.596	53392		
05	TN	DECAY			50	309		J	USUSUS00				5214		28.035	5214		
06	TN	DECAY			50	309		J	CAUSUS00				345		18.840	345		
24. SHIPPERS DATA T. SIGNATURE OF AUTHORIZED OFFICIAL AND DATE SIGNED				25. RECEIVERS DATA T. SIGNATURE OF AUTHORIZED OFFICIAL AND DATE SIGNED														

/

AND
U.S. NUCLEAR REGULATORY COMMISSION
MATERIAL BALANCE REPORT

1. NAME AND ADDRESS DPA CORPORATION 111 TERRACE PARKWAY PASSICANY, NJ 07054	2. LICENSE NUMBER(S) DPR-16	3. REPORTING IDENTIFICATION SYMBOL: RIS; YHA
	4. REPORT PERIOD FROM: 10/01/89 TO: 3/31/90	5. MATERIAL TYPE (SUBMIT SEPARATE REPORT FOR EACH TYPE) 201E1

SECTION A MATERIAL ACCOUNTABILITY

1. DOE/DOE LHM ATTACHED YES NO X	A. ELEMENT WEIGHT	B. ISOTOPE WEIGHT
2. DOE INVEN - DOE OWNED	390333021.	4662657.
3. DOE INVEN - NOT DOE OWNED		
4. PROCUREMENT FROM DOE RECEIPTS RIS		
5. PROCUREMENT FOR ACCOUNT OF DOE		
6. DOE RETURNS - USE A		
7. DOE RETURNS - USE B		
8. DOE RETURNS - OTHER USES		
9. RECLASSIFICATION		
10. FROM OTHER MATERIAL A. 107 B. 107 C. 107		
11. SENT SEPARATE TO DOE ON DOE NRC FORM 741 BY GENERAL ELECTRIC RIS YLO		
12. DONATED MATERIAL FROM DOE TO OTHERS	390333021.	4662657.
13. RECEIVED MATERIAL FROM OTHERS TO DOE		
14. TOTAL LOSS BY DOE		
15. LOSS BY DOE TO OTHERS		
16. LOSS BY OTHERS TO DOE		
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199. LOSS BY OTHERS TO OTHERS		
200. LOSS BY OTHERS TO OTHERS		

SECTION B COUNTRY CONTROL NUMBER DATA

1. COUNTRY CONTROL NUMBER	2. ELEMENT WEIGHT	3. ISOTOPE WEIGHT
USUS0000	361950819.	3665775.
CAUS0000	9106121.	258246.
FRUS0000	1376796.	40455.
SAUS0000	8585791.	240933.
UKUS0000	8939907.	259877.
4. TOTAL WEIGHT (TOTAL MUST AGREE WITH TOTAL ON LINE 80 OR 81 OR BOTH)	389959434.	4465286.

SECTION C CERTIFICATION

TO THE BEST OF MY KNOWLEDGE AND BELIEF THE INFORMATION GIVEN ABOVE AND IN ANY ATTACHED SCHEDULES IS TRUE, COMPLETE, AND CORRECT.

SIGNATURE *E. C. Fitypatrick* TITLE: DIRECTOR - OYSTER CREEK DATE 4/27/90

1. SHIP RIS (14) 14A 2. REC RIS (5-8) 14A 3. TRANS NO (9-14) 17 4. CORR NO (15) PAGE 01 OF 01 PAGES
 5. PROD CODE (16) 6. RESERVED (17) 7. ACTION CODE (18) M 8. DATA CODE (19)
 9. A. SHIP B. LIC 094-16 10. A. REC B. LIC 11. DATA LINES 1(20-21) 11 12. NATURE TRANS 1(22) N NO DIST
 13. A. SHIP FOR ACCT 13. A. SHIP TO ACCT 14. A. SHIP TO ACCT
 B. RIS 1(23-26) B. RIS 1(27-30)
 15. TRANSFER AUTHORITY (134-50) 16. EXPORT OR IMPORT TRANSFERS A. LICENSE NO 3(32-31) B. US PORT EXIT/ENTRY 3(32-35)

17. MATERIAL TYPE AND DESCRIPTION 18. TRANS PROFILE 19. PACKAGE IDENT 20. ACT DATE MO DA YR
 FISSION AND TRANSMUTATION DECAY AND PRODUCTION A. B. CARRIER C. TRANS PT A. NOOF. B. NUMBER 1(70-75)
 N. ISOTOPE FOR PERIOD ENDING 3/31/90 1 3(36-38) 3(40-44) 4(22-25) 4(26-28) A. SHIPMENT 3/31/90
 2 3(45-48) 3(49-53) 4(29-32) 4(33-35) B. SHIP CORR
 21. A. B. C. D. E. F. G. H. I. J. K. L. M. N. O. P. Q. R. S. T. U. V. W. X. Y. Z. AA. AB. AC. AD. AE. AF. AG. AH. AI. AJ. AK. AL. AM. AN. AO. AP. AQ. AR. AS. AT. AU. AV. AW. AX. AY. AZ. BA. BB. BC. BD. BE. BF. BG. BH. BI. BJ. BK. BL. BM. BN. BO. BP. BQ. BR. BS. BT. BU. BV. BW. BX. BY. BZ. CA. CB. CC. CD. CE. CF. CG. CH. CI. CJ. CK. CL. CM. CN. CO. CP. CQ. CR. CS. CT. CU. CV. CW. CX. CY. CZ. DA. DB. DC. DD. DE. DF. DG. DH. DI. DJ. DK. DL. DM. DN. DO. DP. DQ. DR. DS. DT. DU. DV. DW. DX. DY. DZ. EA. EB. EC. ED. EE. EF. EG. EH. EI. EJ. EK. EL. EM. EN. EO. EP. EQ. ER. ES. ET. EU. EV. EW. EX. EY. EZ. FA. FB. FC. FD. FE. FF. FG. FH. FI. FJ. FK. FL. FM. FN. FO. FP. FQ. FR. FS. FT. FU. FV. FW. FX. FY. FZ. GA. GB. GC. GD. GE. GF. GG. GH. GI. GJ. GK. GL. GM. GN. GO. GP. GQ. GR. GS. GT. GU. GV. GW. GX. GY. GZ. HA. HB. HC. HD. HE. HF. HG. HH. HI. HJ. HK. HL. HM. HN. HO. HP. HQ. HR. HS. HT. HU. HV. HW. HX. HY. HZ. IA. IB. IC. ID. IE. IF. IG. IH. II. IJ. IK. IL. IM. IN. IO. IP. IQ. IR. IS. IT. IU. IV. IW. IX. IY. IZ. JA. JB. JC. JD. JE. JF. JG. JH. JI. JJ. JK. JL. JM. JN. JO. JP. JQ. JR. JS. JT. JU. JV. JW. JX. JY. JZ. KA. KB. KC. KD. KE. KF. KG. KH. KI. KJ. KL. KM. KN. KO. KP. KQ. KR. KS. KT. KU. KV. KW. KX. KY. KZ. LA. LB. LC. LD. LE. LF. LG. LH. LI. LJ. LK. LL. LM. LN. LO. LP. LQ. LR. LS. LT. LU. LV. LW. LX. LY. LZ. MA. MB. MC. MD. ME. MF. MG. MH. MI. MJ. MK. ML. MM. MN. MO. MP. MQ. MR. MS. MT. MU. MV. MW. MX. MY. MZ. NA. NB. NC. ND. NE. NF. NG. NH. NI. NJ. NK. NL. NM. NO. NP. NQ. NR. NS. NT. NU. NV. NW. NX. NY. NZ. OA. OB. OC. OD. OE. OF. OG. OH. OI. OJ. OK. OL. OM. ON. OO. OP. OQ. OR. OS. OT. OU. OV. OW. OX. OY. OZ. PA. PB. PC. PD. PE. PF. PG. PH. PI. PJ. PK. PL. PM. PN. PO. PP. PQ. PR. PS. PT. PU. PV. PW. PX. PY. PZ. QA. QB. QC. QD. QE. QF. QG. QH. QI. QJ. QK. QL. QM. QN. QO. QP. QQ. QR. QS. QT. QU. QV. QW. QX. QY. QZ. RA. RB. RC. RD. RE. RF. RG. RH. RI. RJ. RK. RL. RM. RN. RO. RP. RQ. RR. RS. RT. RU. RV. RW. RX. RY. RZ. SA. SB. SC. SD. SE. SF. SG. SH. SI. SJ. SK. SL. SM. SN. SO. SP. SQ. SR. SS. ST. SU. SV. SW. SX. SY. SZ. TA. TB. TC. TD. TE. TF. TG. TH. TI. TJ. TK. TL. TM. TN. TO. TP. TQ. TR. TS. TT. TU. TV. TW. TX. TY. TZ. UA. UB. UC. UD. UE. UF. UG. UH. UI. UJ. UK. UL. UM. UN. UO. UP. UQ. UR. US. UT. UV. UW. UX. UY. UZ. VA. VB. VC. VD. VE. VF. VG. VH. VI. VJ. VK. VL. VM. VN. VO. VP. VQ. VR. VS. VT. VU. VV. VW. VX. VY. VZ. WA. WB. WC. WD. WE. WF. WG. WH. WI. WJ. WK. WL. WM. WN. WO. WP. WQ. WR. WS. WT. WU. WV. WW. WX. WY. WZ. XA. XB. XC. XD. XE. XF. XG. XH. XI. XJ. XK. XL. XM. XN. XO. XP. XQ. XR. XS. XT. XU. XV. XW. XX. XY. XZ. YA. YB. YC. YD. YE. YF. YG. YH. YI. YJ. YK. YL. YM. YN. YO. YP. YQ. YR. YS. YT. YU. YV. YW. YX. YY. YZ. ZA. ZB. ZC. ZD. ZE. ZF. ZG. ZH. ZI. ZJ. ZK. ZL. ZM. ZN. ZO. ZP. ZQ. ZR. ZS. ZT. ZU. ZV. ZW. ZX. ZY. ZZ.

LINE	TYPE	ISOTOPE	NO	PROD	MAT	COMP	PROD	OWN	COUNTRY	KEY	GROSS	NET	ELEMENT	ELEMT	WEIGHTA	ISOTOPE	ISOTOPE	ISOTYP
NO	NO	NO	NUMB	TYPE	CODE	CODE	CODE	CODE	CONTROL	MEAS	WGHT	WGHT	WEIGHT	LOE	ISOTOPE	WEIGHT	LOE	ISOTYP
2(20)	2(21)	2(22)	2(40)	2(41)	2(54)	2(56)	(60)	(61)	2(62)	2(70)			5(43)	5(54)	5(59)	5(65)	5(76)	
2(21)	2(21)	2(21)	2(41)	2(41)	2(54)	2(56)	(60)	(61)	2(62)	2(70)			5(43)	5(54)	5(59)	5(65)	5(76)	
A.	B.	C.	D.	E.	F.	G.	H.	I.	J.	K.	L.	M.	N.	O.	P.	Q.	R.	S.
01	UN	FISSION AND TRANSMUTATION	20	309	J	USUS0000							278947.		1.05		134811.	
02	UN	DECAY	50	309	J	USUSUS00							3412.		28.25		3412.	
03	NR	PRODUCTION	50	309	J	USUSUS00							58739.		36.22		37462.	
04	UN	FISSION AND TRANSMUTATION	20	309	J	CAUS0000							32467.		3.06		21487.	
05	NR	PRODUCTION	50	309	J	CAUSUS00							10999.		24.27		8330.	
06	UN	FISSION AND TRANSMUTATION	20	309	J	FRUS0000							3595.		3.10		2363.	
07	NR	PRODUCTION	50	309	J	FRUSUS00							1210.		24.30		916.	
08	UN	FISSION AND TRANSMUTATION	20	309	J	SAUS0000							33106.		3.05		21846.	
09	NR	PRODUCTION	50	309	J	SAUSUS00							11105.		23.82		8460.	
10	UN	FISSION AND TRANSMUTATION	20	309	J	UKUS0000							25472.		3.09		16864.	
11	NR	PRODUCTION	50	309	J	UKUSUS00							8630.		24.31		6532.	

24. SHIPPERS DATA
 T. SIGNATURE OF AUTHORIZED OFFICIAL AND DATE SIGNED

25. RECEIVERS DATA
 T. SIGNATURE OF AUTHORIZED OFFICIAL AND DATE SIGNED
 BASED ON SHIPPERS VALUES

E. J. [Signature] 4/27/90

Copy to [Signature]

MANDATORY DATA COLLECTION
 AUTHORIZED BY 10 CFR 30.40, 50.70, 75.150, Public Laws 83-703, 93-438, 95-91

U.S. DEPARTMENT OF ENERGY
 AND
 U.S. NUCLEAR REGULATORY COMMISSION
 MATERIAL BALANCE REPORT

1. NAME AND ADDRESS Omaha Public Power District 444 South 16th Street Mall Omaha, NE 68102		2. LICENSE NUMBER(S) DPR-40		3. RIS YRZ	
		4. REPORT PERIOD		5. MATERIAL TYPE 20E1	
		FROM Apr. 01, 1990	TO Sept. 30, 1990		

SECTION A MATERIAL ACCOUNTABILITY			A. ELEMENT WEIGHT	B. ISOTOPE WEIGHT
7. DOE/NRC 740M ATTACHED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
8. BEGINNING INVENTORY - DOE OWNED				
9. BEGINNING INVENTORY - NOT DOE OWNED			154598661	2109277
11. PROCUREMENT FROM DOE				
FROM:				
12. PROCUREMENT - FOR THE ACCOUNT OF DOE				
14. DOD RETURNS - BSE A				
15. DOD RETURNS - BSE B				
16. DOD RETURNS - OTHER USES				
21. PRODUCTION				
22. FROM OTHER MATERIALS				
a. ICT				
b. ICT				
c. ICT				
30. RECEIPTS REPORTED TO DOE/NRC ON DOE/NRC FORM 741 (Not listed elsewhere)				
FROM:				
RIS				
34. DONATED MATERIAL - FROM DOE TO OTHERS				
35. DONATED MATERIAL - FROM OTHERS TO DOE				
40. TOTAL (Lines 8-39)			154598661	2109277
REMOVALS				
41. EXPENDED IN SPACE PROGRAM				
42. SALES TO DOE RIS TO:				
TO:				
43. SALES TO OTHERS FOR THE ACCOUNT OF DOE				
TO:				
44. DOD - BSE A				
45. DOD - BSE B				
46. DOD - OTHER USES				
47. EXPENDED IN DOE TEST				
48. ROUTINE TEST				
49. SHIPPER - RECEIVER DIFFERENCE				
51. SHIPMENTS REPORTED TO NRC/DOE ON DOE/NRC FORM 741 (Not listed elsewhere)				
TO:				
RIS				
54. DONATED MATERIAL - TO DOE BY OTHERS				
55. DONATED MATERIAL - TO OTHERS BY DOE				
71. DEGRADATION TO OTHER MATERIALS				
a. ICT				
b. ICT				
72. DECAY				
73. FISSION AND TRANSPORTATION			229975	128729
74. NORMAL OPERATIONAL LOSSES/MEASURED DISCARDS				
75. ACCIDENTAL LOSSES				
76. APPROVED WRITE-OFFS				
77. INVENTORY DIFFERENCE				
80. ENDING INVENTORY - DOE OWNED				
81. ENDING INVENTORY - NOT DOE OWNED				
82. TOTAL (Lines 41-81)			154368686	1980548
83. BIAS ADJUSTMENT			154598661	2109277

SECTION B COUNTRY CONTROL NUMBER DATA			2. ELEMENT WEIGHT	3. ISOTOPE WEIGHT
1. COUNTRY CONTROL NUMBER				
USUS0000		121548968		1519347
FRUS0000		5504447		60779
CAUS0000		21669388		340983
NGUS0000		5645883		59439
TOTAL (Lines 1-4)			154368686	1980548

(Rules apply with 740M, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000)

SECTION C CERTIFICATION

TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE INFORMATION GIVEN ABOVE AND IN ANY ATTACHED SCHEDULES IS TRUE, COMPLETE, AND CORRECT.

SIGNATURE *J. K. Gove* TITLE Acting Division Manager - NOD DATE 10-29-90

18. U.S.C. SECTION 1001: ALL OF JUNE 25, 1962, STAT. 749; MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION

U.S. DEPARTMENT OF ENERGY
AND
U.S. NUCLEAR REGULATORY COMMISSION
MATERIAL BALANCE REPORT

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 1.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNR88 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555 AND TO THE PAPERWORK REDUCTION PROJECT (038-0479 and 3150-0004), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

1. NAME AND ADDRESS	2. LICENSE NUMBER(S)	3. REPORTING IDENTIFICATION SYMBOL (RIS)
	4. REPORT PERIOD	
	FROM	TO

SECTION A MATERIAL ACCOUNTABILITY

	A. ELEMENT WEIGHT	ISOTOPE WEIGHT
7. DOE/NRC FORM ATTACHED <input type="checkbox"/> YES <input type="checkbox"/> NO		
8. BEGINNING INVENTORY - DOE OWNED		
9. BEGINNING INVENTORY - NOT DOE OWNED		
RECEIPTS		
11. PROCUREMENT FROM DOE		
FROM		
12. PROCUREMENT - FOR THE ACCOUNT OF DOE		
13. DOD RETURNS - USE A		
14. DOD RETURNS - USE B		
15. DOD RETURNS - OTHER USES		
21. PRODUCTION		
22. FROM OTHER MATERIALS	a. ICT	
	b. ICT	
	c. ICT	
30. RECEIPTS REPORTED TO DOE/NRC ON DOE/NRC FORM 741 (Not listed elsewhere)		
FROM	RIS	
36. DONATED MATERIAL - FROM DOE TO OTHERS		
39. DONATED MATERIAL - FROM OTHERS TO DOE		
40. TOTAL (Lines 8-39)		
REMOVALS		
41. EXPENDED IN SPACE PROGRAMS		
42. SALES TO DOE RIS TO		
TO		
43. SALES TO OTHERS FOR THE ACCOUNT OF DOE		
TO		
44. DOD - USE A		
45. DOD - USE B		
46. DOD - OTHER USES		
47. EXPENDED IN DOL TESTS		
48. ROUTINE TESTS		
49. SHIPPER - RECEIVER DIFFERENCE		
51. SHIPMENTS REPORTED TO NRC/DOE ON DOE/NRC FORM 741 (Not listed elsewhere)		
TO	RIS	
56. DONATED MATERIAL - TO DOE BY OTHERS		
59. DONATED MATERIAL - TO OTHERS BY DOE		
71. DEGRADATION TO OTHER MATERIALS	a. ICT	
	b. ICT	
72. DECAY		
73. FISSION AND TRANSMUTATION		
74. NORMAL OPERATIONAL LOSSES/MEASURED DISCARDS		
75. ACCIDENTAL LOSSES		
76. APPROVED WRITE-OFFS		
77. INVENTORY DIFFERENCE		
80. ENDING INVENTORY - DOE OWNED		
81. ENDING INVENTORY - NOT DOE OWNED		
82. TOTAL (Lines 41-81)		
83. BIAS ADJUSTMENT		

SECTION B COUNTRY CONTROL NUMBER DATA		
1. COUNTRY CONTROL NUMBER	2. ELEMENT WEIGHT	3. ISOTOPE WEIGHT
4. TOTAL WEIGHT (Total must agree with total on line 82)		

SECTION C CERTIFICATION

To the best of my knowledge and belief, the information given above and in any attached schedules is true, complete, and correct.

SIGNATURE (See instructions for provisions on confidentiality.) TITLE DATE

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECTS. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

U.S. DEPARTMENT OF ENERGY
AND
U.S. NUCLEAR REGULATORY COMMISSION
PHYSICAL INVENTORY LISTING

REPORTING IDENTIFICATION SYMBOL (RIS)

2. DOE/NRC FORM 740M ATTACHED

5. LICENSE NUMBER(S)

3. INVENTORY DATE

TO

6. BATCH DATA

A MATERIAL TYPE	B CLASSIFICATION	C ELEMENT SYMBOL	D ELEMENT WEIGHT	E DATE RECEIVED	F DATE EXPIRES	G SOURCE	H FORM	I QUANTITY	J UNIT	K DESCRIPTION	L NO. OF ITEMS	M MATERIAL SYMBOL	N. MATERIAL IDENTIFICATION		O RIS SYMBOL
													MEASUREMENT DATE	MEASUREMENT METHOD	
7. TOTALS															
8. SIGNATURE															9. TITLE
															10. DATE

18 U.S.C. SECTION 1001, ACT OF JUNE 26, 1948, STAT. 749, MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTERS WITHIN ITS JURISDICTION

DOE/NRC FORM 781
 (1-78) Previous editions are obsolete
 MANDATORY DATA COLLECTION
 AUTHORIZED BY 10 CFR 83.40, 50.70
 By 150 Public Laws 81-703 91-438, 95-81

U.S. DEPARTMENT OF ENERGY
 AND
 U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0001
 EXPIRES 7/31/87

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 10 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (IMRB 7714) U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON DC 20555 AND TO THE PAPERWORK REDUCTION PROJECT (3150-0001) OFFICE OF MANAGEMENT AND BUDGET WASHINGTON DC 20503

NUCLEAR MATERIAL TRANSACTION REPORT

1. SHIPPER'S NAME		2. RECEIVER'S NAME		3. TRANSFER CODE		4. DESCRIPTION NO.		5. MATERIAL CODE		6. QUANTITY		7. DATE		8. DATE		9. DATE		10. DATE	
SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER		PAGE		PAGE		COPY		BY	

11. NAME AND ADDRESS OF SHIPPER		12. NAME AND ADDRESS OF RECEIVER		13. NO. OF CONTAINERS		14. NATURE OF TRANSACTION		15. NO. OF CONTAINERS		16. NATURE OF TRANSACTION		17. NO. OF CONTAINERS		18. NATURE OF TRANSACTION	
SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER	

19. SPECIAL HANDLING INSTRUCTIONS		20. SPECIAL HANDLING INSTRUCTIONS		21. SPECIAL HANDLING INSTRUCTIONS		22. SPECIAL HANDLING INSTRUCTIONS		23. SPECIAL HANDLING INSTRUCTIONS		24. SPECIAL HANDLING INSTRUCTIONS		25. SPECIAL HANDLING INSTRUCTIONS		26. SPECIAL HANDLING INSTRUCTIONS	
SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER	

A. DATE	B. LOCATION	C. QUANTITY	D. MATERIAL	E. DESCRIPTION	F. TRANSPORTATION MODE		G. MODE		H. MODE	I. MODE	J. MODE	K. MODE	L. MODE	M. MODE	N. MODE	O. MODE	P. MODE	Q. MODE	R. MODE	
					A. DATE	B. LOCATION	C. QUANTITY	D. MATERIAL												E. DESCRIPTION

24. SHIPPER'S DATA		25. RECEIVER'S DATA		26. SHIPPER'S DATA		27. RECEIVER'S DATA		28. SHIPPER'S DATA		29. RECEIVER'S DATA		30. SHIPPER'S DATA		31. RECEIVER'S DATA		32. SHIPPER'S DATA		33. RECEIVER'S DATA		34. SHIPPER'S DATA		35. RECEIVER'S DATA	
SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER	

24. SHIPPER'S DATA
 (See instructions (NUREG/BR 0006) for provisions regarding confidentiality)
 SIGNATURE OF AUTHORIZED OFFICIAL AND DATE SIGNED

25. RECEIVER'S DATA
 (See instructions (NUREG/BR 0006) for provisions regarding confidentiality)
 SIGNATURE OF AUTHORIZED OFFICIAL AND DATE SIGNED

24. SHIPPER'S DATA		25. RECEIVER'S DATA		26. SHIPPER'S DATA		27. RECEIVER'S DATA		28. SHIPPER'S DATA		29. RECEIVER'S DATA		30. SHIPPER'S DATA		31. RECEIVER'S DATA		32. SHIPPER'S DATA		33. RECEIVER'S DATA		34. SHIPPER'S DATA		35. RECEIVER'S DATA	
SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER		SHIPPER		RECEIVER	

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECTS. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

NUCLEAR MATERIALS MANAGEMENT AND SAFEGUARDS SYSTEM

(NMMSS)

S U M M A R Y

- o National (NRC/DOE) Automated Reporting System for Nuclear Materials**

- o Satisfies Bilateral, International and National Information Needs**

- o Proposed Amendment**
 - Eliminates Paper Forms**
 - Provides Cost Savings**
 - Streamlines Data Collection**
 - Increases Accuracy of Information**

The 12 items from the CRGR Charter

1. The proposed generic requirement or staff position as it is proposed to be sent out to licensees:

See the Federal Register Notice.

2. Draft staff papers or other underlying staff documents supporting the requirements or staff positions:

See: a. the Commission Paper, "Proposed Amendments to 10 CFR Part 55 on Renewal of Licenses and Requalification,"

b. the proposed rule,

c. the proposed regulatory analysis,

d. the SRM of June 23, 1992,

e. the July, 23, 1992 memorandum from C. J. Heltemes, Jr. to Frank J. Miraglia and Martin G. Malsch,

f. SECY-90-235, "NRC Recognition of Good Performance by Power Reactor Licensees," and

g. SECY-92-100, "Status and Direction of the Licensed Operator Requalification Program."

3. The sponsoring office's position as to whether the proposal would increase requirements or staff positions, implement existing requirements or staff positions, or would relax or reduce existing requirements or positions:

The "Scope" of Part 55, Section 55.2, will be revised to include facility licensees. This is an addition to the regulation. However, it merely eliminates currently existing ambiguities between the regulations of Parts 50 and 55. Part 50, in Sections 50.54(i) through (m), already imposes Part 55 requirements on facility licensees, and Part 55 already specifies requirements for facility licensees. This change is administrative in nature and only serves to codify already existing regulatory requirements.

The existing requirements will be reduced in that 10 CFR 55.57(b)(2)(iv) will be deleted. Each licensed individual will no longer be required to pass an NRC-administered requalification examination during the term of his or her license for the purpose of license renewal.

The existing requirements will be increased in that facility licensees will be required to submit to the NRC their annual requalification operating tests and comprehensive requalification written examinations 30 days prior to the conduct of these tests and examinations. However,

co-located

X

this requirement only codifies the staff's current practice of requesting examination material for the purpose of conducting NRC examinations and the material being requested (exams only) is a reduction in the scope of material previously requested.

4. The proposed method of implementation along with the concurrence (and any comments) of OGC on the method proposed. The concurrence of affected program offices or an explanation of any non-concurrences:

See the concurrence pages on the Commission Paper and Federal Register Notice. The proposed method of implementation is to revise 10 CFR Part 55 and conduct performance-based inspections of facility licensee requalification programs.

5. Regulatory analyses generally conforming to the directives and guidance of NUREG/BR-0058 and NUREG/CR-3568.

See the Regulatory Analysis in the Federal Register Notice.

6. Identification of the category of reactor plants to which the generic requirement or staff position is to apply.

The revisions to Part 55 apply to all categories of reactor plants. They also apply to all licensed operators.

7. For backfits other than compliance or adequate protection backfits, a backfit analysis as defined in 10 CFR 50.109. The backfit analysis includes, for each category of reactor plant, an evaluation which demonstrates how action should be prioritized and scheduled in light of other ongoing regulatory activities. The backfit analysis documents for consideration information available concerning the following factors as may be appropriate and any other information relevant and material to the proposed action:

The addition of the requirement that facility licensees submit to the NRC their annual requalification operating tests and comprehensive requalification written examinations 30 days prior to the conduct of these tests and examinations may require modification or addition to the procedures required to operate a facility. See the Backfit Analysis in the Federal Register Notice.

- (a) Statement of the specific objectives that the proposed action is designated to achieve:

The staff seeks to improve operational safety at each facility by directing its ~~experienced~~ examiners to inspect and oversee facility requalification programs rather than conducting requalification examinations. The staff's experience since the beginning of the requalification program, indicates that weaknesses in the implementation of the facility program are generally the root cause of deficiencies in the performance of operators. The staff could more effectively allocate its

examiners to perform on-site inspections of facility requalification examination and training programs in accordance with indicated programmatic weaknesses rather than scheduling examiners in accordance with the number of individuals requiring license renewal. By redirecting the examiners to inspect programs, the staff expects to find and correct programmatic weaknesses more rapidly than by having them continue to conduct requalification examinations for each individual licensed operator.

- (b) General description of the activity that would be required by the licensee or applicant in order to complete the action:

The licensed operators need take no additional actions. Each operator will continue to meet all the conditions of his or her license described in 10 CFR 55.53, which includes passing the facility-administered requalification examinations for license renewal.

conducted

As part of the rule change, the facility licensees will be required to submit to the NRC their annual operating tests and comprehensive written examinations used for operator requalification. The staff will audit these examinations for conformance with 10 CFR 55.59. The staff will conduct this review and review other information already available to the staff to determine the scope of onsite inspections of facility licensee requalification programs. The NRC will continue to expect each facility to meet all of the conditions required for conducting a requalification program in accordance with 10 CFR 55.59.

- (c) Potential change in the risk to the public from the accidental offsite release of radioactive material:

The staff believes that it could continue to ensure, and possibly improve, operational safety at each facility by directing its ~~experienced~~ examiners to inspect and oversee facility requalification programs rather than conducting requalification examinations. The staff's experience since the beginning of the requalification program, indicates that weaknesses in the implementation of the facility program are generally the root cause of deficiencies in the performance of operators. The NRC could more effectively allocate its examiners to perform on-site inspections of facility requalification examination and training programs in accordance with indicated programmatic weaknesses rather than scheduling examiners in accordance with the number of individuals requiring license renewal. By redirecting the examiners to inspect programs, the NRC expects to find and correct programmatic weaknesses more rapidly than by having them continue to conduct requalification examinations for each individual licensed operator. This may result in a reduction of the risk to the public from the accidental offsite release of radioactive material.

and thereby improve operational safety.

- (d) Potential impact on radiological exposure of facility employees and other onsite workers:

Earlier identification and correction of programmatic weaknesses should improve operator performance and may reduce radiological exposure of facility employees and other onsite workers.

- (e) Installation and continuing costs associated with the action, including the cost of facility downtime or the cost of construction delay:

The staff expects that each facility licensee would continue in its present manner of conducting requalification programs.

The amount of material that each facility licensee will be required to submit under the proposed amendments is expected to be much smaller than the amount each facility licensee currently submits to the NRC for the routine NRC-conducted requalification examinations. Currently, in order to assist the NRC in the development of NRC-conducted requalification examinations, facility licensees typically submit their examination banks (written, simulator and job performance measures), Technical Specifications, procedures (operating, surveillance, administrative, abnormal, emergency operating and emergency plan), and requalification training material.

The proposed amendment would reduce the burden on the facility licensee because each facility licensee would have its administrative and technical staff expend fewer hours than are now spent to assist in developing and administering the NRC requalification examination. Currently, facility evaluators assist NRC examiners to develop, validate, and administer the NRC examinations, to ensure that the NRC examinations are valid and appropriate for the facility at which the examinations are being given.

- (f) The potential safety impact of changes in plant or operational complexity, including the relationship to proposed and existing regulatory requirements and staff positions:

See answer to 7(c).

Section 306 of the Nuclear Waste Policy Act (NWPA) of 1982 authorized and directed the NRC "to promulgate regulations, or other appropriate Commission regulatory guidance, for the training and qualifications of civilian nuclear powerplant operators, supervisors, technicians and other appropriate operating personnel." Such regulations or guidance were to "establish simulator training requirements for applicants for civilian nuclear powerplant operator licenses and for operator requalification programs; requirements governing NRC administration of requalification examinations; requirements for

operating tests at civilian nuclear powerplant simulators, and instructional requirements for civilian nuclear powerplant licensee personnel training programs."

Conducted
The staff believes the proposed amendments will continue to meet the requirements of Section 306 of the NHPA without the requirement for each licensed individual to pass an NRC-administered requalification examination during the 6-year term of the individual's license. The regulations will continue to require facilities to have requalification programs and conduct requalification examinations. The NRC will provide oversight for these programs and examinations through inspections. In addition, Section 55.59(a)(2)(iii) provides that the NRC may administer *conduct* requalification examinations in lieu of accepting the facility licensee's certification that a licensed individual has passed the facility-administered requalification examination. The NRC may find that in some limited cases this option is warranted after conducting an on-site inspection of the facility's requalification program. The proposed amendments will not affect the regulatory or other appropriate guidance required by Section 306 of the NHPA and established in Section 55.59(a)(2)(iii) for administering NRC requalification examinations in lieu of facility-administered *conducting* examinations.

Verifying licensee requalification programs through the NRC inspection process is consistent with the proposed rule for 10 CFR Parts 50 and 52, "Training and Qualification of Nuclear Power Plant Personnel," that also addressed the directives of Section 306 of the NHPA.

- (g) The estimated resource burden on the NRC associated with the proposed action and the availability of such resources:

Conducting
The staff believes that the proposed amendments to 10 CFR Part 55 would reduce the cost to regulate the administration of the NRC's requalification program requirements. The staff also believes that the current NRC resources used in the operator licensing program could more effectively be used by allocating examiners according to the indicated performance of each facility's requalification training program rather than according to the number of licensed individuals at a facility. The NRC would direct these resources to find programmatic weaknesses earlier, correct safety issues, and implement an onsite inspection program instead of routinely administering individual requalification examinations for the purpose of license renewal.

- (h) The potential impact of differences in facility type, design or age on the relevancy and practicality of the proposed action:

The staff believes there is no potential impact of differences in facility type, design or age on the relevancy and practicality of

the proposed action because these factors are not germane to the proposed amendments.

- (i) Whether the proposed action is interim or final, and if interim, the justification for imposing the proposed action on an interim basis:

The proposed action will be final upon issuance of a final rule. No interim action is proposed.

8. For each backfit analyzed pursuant to 10 CFR 50.109(a)(2) (i.e., not adequate protection backfits and not compliance backfits) the proposing office director's determination, together with the rationale for the determination, that (a) there is a substantial increase in the overall protection of public health and safety or the common defense and security to be derived from the proposal; and (b) the direct and indirect costs of implementation, for the facilities affected, are justified in view of this increased protection:

See the answers to 7(c) and (e).

9. For adequate protection or compliance backfits evaluated pursuant to 10 CFR 50.109(a)(4), (1) a documents evaluation and (2) an evaluation of immediate actions that were taken without prior CRGR review:

The revisions to Part 55 are not backfits evaluated pursuant to 10 CFR 50.109(a)(4). No immediate actions have been taken.

10. For each evaluation conducted for proposed relaxations or decreases in current requirements or staff positions, the proposing office director's determination, together with the rationale for the determination that (1) the public health and safety would be adequately protected if the proposed reduction in requirements or positions were implemented, and (2) the cost savings attributed to the action would be substantial enough to justify taking the action:

See the answers to 7(c), (e) and (g).

11. For each request for information under 10 CFR 50.54(f) an evaluation that includes (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, and (d) a statement affirming that the request does not impose new requirements on the licensee, other than for the requested information:

The revisions to Part 55 do not include requests for information under 10 CFR 50.54(f).

12. An assessment of how the proposed action relates to the Commission's Safety Goal Policy Statement.

The revisions to Part 55 do not relate directly to the Safety Goal Policy Statement as this Statement only implicitly addresses plant operations. However, the staff recognizes that how well a plant is operated is a vital component of plant safety and believes that it could continue to ensure, and ~~possibly~~ improve, operational safety at each facility by directing its experienced examiners to inspect and oversee facility requalification programs rather than conducting requalification examinations. In this regard, the staff believes that the proposed revision to Part 55 directly relates to the intent of the Commission's Safety Goal Policy Statement.

RA5. - my input

- pls have sec'y make changes & E-Mail To me after your review.

Date
9/19

The 12 items from the CRGR Charter

1. The proposed generic requirement or staff position as it is proposed to be sent out to licensees:

See the Federal Register Notice.

2. Draft staff papers or other underlying staff documents supporting the requirements or staff positions:

See: a. the Commission Paper, "Proposed Amendments to 10 CFR Part 55 on Renewal of Licenses and Requalification,"

b. the proposed rule
c. the proposed regulatory analyses

d. the SRM of June 23, 1992,

e. the July, 23, 1992 memorandum from C.J. Heltemes, Jr. to Frank J. Miraglia and Martin G. Malsch,

f. SECY-90-235, "NRC Recognition of Good Performance by Power Reactor Licensees," and

g. SECY-92-100, "Status and Direction of the Licensed Operator Requalification Program."

3. The sponsoring office's position as to whether the proposal would increase requirements or staff positions, implement existing requirements or staff positions, or would relax or reduce existing requirements or positions:

The "Scope" of Part 55, Section 55.2, will be revised to include facility licensees. This is an addition to the regulation. However, it merely eliminates currently existing ambiguities between the regulations of Parts 50 and 55. Part 50, in sections 50.54(i) through (m), already imposes Part 55 requirements on facility licensees, and Part 55 already specifies requirements for facility licensees. This change is administrative in nature and only seems to codify already existing regulatory requirements.

The existing requirements will be reduced in that 10 CFR 55.57(b)(2)(iv) will be deleted. Each licensed individual will no longer be required to pass an NRC-administered requalification examination during the term of his or her license, for the purpose of license renewal.

The existing requirements will be increased in that facility licensees will be required to submit to the NRC their annual requalification operating tests and comprehensive requalification written examinations 30 days prior to the conduct of these tests and examinations. However, this requirement only codify's the staff's ~~current~~ current practice of requesting examination material for the purpose of ~~conducting~~ conducting NRC examinations.

4. The proposed method of implementation along with the concurrence (and any comments) of OGC on the method proposed. The concurrence of affected program offices or an explanation of any non-concurrences:

See the concurrence pages on the Commission Paper and Federal Register Notice. The proposed method of implementation is to revise 10 CFR Part 55 and conduct performance-based inspections of facility licensee requalification programs.

The staff's current and the material being requested (exams only) is a reduction in the scope of material previously requested.

5. Regulatory analyses generally conforming to the directives and guidance of NUREG/BR-0058 and NUREG/CR-3568.

See the Regulatory Analysis in the Federal Register Notice.

6. Identification of the category of reactor plants to which the generic requirement or staff position is to apply.

The revisions to Part 55 apply to all categories of reactor plants. They also apply to all licensed operators.

7. For backfits other than compliance or adequate protection backfits, a backfit analysis as defined in 10 CFR 50.109. The backfit analysis includes, for each category of reactor plant, an evaluation which demonstrates how action should be prioritized and scheduled in light of other ongoing regulatory activities. The backfit analysis documents for consideration information available concerning the following factors as may be appropriate and any other information relevant and material to the proposed actions:

The addition of the requirement that facility licensees submit to the NRC their annual requalification operating tests and comprehensive requalification written examinations 30 days prior to the conduct of these tests and examinations may require modification or addition to the procedures required to operate a facility. See the Backfit Analysis in the Federal Register Notice.

- (a) Statement of the specific objectives that the proposed action is designated to achieve:

The staff seeks to improve operational safety at each facility by directing its experienced examiners to inspect and oversee facility requalification programs rather than conducting requalification examinations. The staff's experience since the beginning of the requalification program, indicates that weaknesses in the implementation of the facility program are generally the root cause of deficiencies in the performance of operators. The staff could more effectively allocate its examiners to perform on-site inspections of facility requalification examination and training programs in accordance with indicated programmatic weaknesses rather than scheduling examiners in accordance with the number of individuals requiring license renewal. By redirecting the examiners to inspect programs, the staff expects to find and correct programmatic weaknesses more rapidly than by having them continue to conduct requalification examinations for each individual licensed operator.

- (b) General description of the activity that would be required by the licensee or applicant in order to complete the action:

The licensed operators need take no additional actions. Each operator will continue to meet all the conditions of his or her license described in 10 CFR 55.53, which includes passing the facility-administered requalification examinations for license renewal.

As part of the rule change, the facility licensees will be required to submit to the NRC their annual operating tests and comprehensive written examinations used for operator requalification. The staff will ~~audit~~ ^{audit} these examinations for conformance with 10 CFR 55.59. The staff will conduct this review and review other information already available to the staff to determine the scope of onsite inspections of facility licensee requalification programs. The NRC will continue to expect each facility to meet all of the conditions required for conducting a requalification program in accordance with 10 CFR 55.59.

- (c) Potential change in the risk to the public from the accidental offsite release of radioactive material:

The staff believes that it could continue to ensure, and possibly improve, operational safety at each facility by directing its experienced examiners to inspect and oversee facility requalification programs rather than conducting requalification examinations. The staff's experience since the beginning of the requalification program, indicates that weaknesses in the implementation of the facility program are generally the root cause of deficiencies in the performance of operators. The NRC could more effectively allocate its examiners to perform on-site inspections of facility requalification examination and training programs in accordance with indicated programmatic weaknesses rather than scheduling examiners in accordance with the number of individuals requiring license renewal. By redirecting the examiners to inspect programs, the NRC expects to find and correct programmatic weaknesses more rapidly than by having them continue to conduct requalification examinations for each individual licensed operator. This may result in a reduction of the risk to the public from the accidental offsite release of radioactive material.

- (d) Potential impact on radiological exposure of facility employees and other onsite workers:

Earlier identification and correction of programmatic weaknesses should improve operator performance and may reduce radiological exposure of facility employees and other onsite workers.

The staff believes the proposed amendments will continue to meet the requirements of Section 306 of the NHPA without the requirement for each licensed individual to pass an NRC-administered requalification examination during the 5-year term of the individual's license. The regulations will continue to require facilities to have requalification programs and conduct requalification examinations. The NRC will provide oversight for these programs and examinations through inspections. In addition, Section 55.59(a)(2)(iii) provides that the NRC may administer requalification examinations in lieu of accepting the facility licensee's certification that a licensed individual has passed the facility-administered requalification examination. The NRC may find that in some limited cases this option is warranted after conducting an on-site inspection of the facility's requalification program. The proposed amendments will not affect the regulatory or other appropriate guidance required by Section 306 of the NHPA and established in Section 55.59(a)(2)(iii) for administering NRC requalification examinations in lieu of facility-administered examinations.

Verifying licensee requalification programs through the NRC inspection process is consistent with the proposed rule for 10 CFR Parts 50 and 52, "Training and Qualification of Nuclear Power Plant Personnel," that also addressed the directives of Section 306 of the NHPA.

- (g) The estimated resource burden on the NRC associated with the proposed action and the availability of such resources:

The staff believes that the proposed amendments to 10 CFR Part 55 would reduce the cost to ~~implement the operator licensing program~~. The staff also believes that the current NRC resources used in the operator licensing program could more effectively be used by allocating examiners according to the indicated performance of each facility's requalification training program rather than according to the number of licensed individuals at a facility. The NRC would direct these resources to find programmatic weaknesses earlier, correct safety issues, and implement an onsite inspection program instead of routinely administering individual requalification examinations *for the purpose of license renewal.*

regulate the administration of the NRC's requalification program requirements.

- (h) The potential impact of differences in facility type, design or age on the relevancy and practicality of the proposed action:

The staff believes there is no potential impact of differences in facility type, design or age on the relevancy and practicality of the proposed action because these factors are not germane to the proposed amendments.

12. An assessment of how the proposed action relates to the Commission's Safety Goal Policy Statement.

The revisions to Part 55 do not relate directly to the Safety Goal Policy Statement as this Statement only implicitly addresses plant operations. However, the staff recognizes that how well a plant is operated is a vital component of plant safety and believes that it could continue to ensure, and possibly improve, operational safety at each facility by directing its experienced examiners to inspect and oversee facility requalification programs rather than conducting requalification examinations.

In this regard the staff believes that the proposed revision to Part 55 directly relates to the intent of the Commission's Safety Goal Policy Statement.