



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 8, 1993

MEMORANDUM FOR: NRR Project Directors, ADPR
NRR Branch Chiefs, ADT

FROM: Ledyard B. Marsh, Director
Project Directorate III-1
Division of Reactor Projects III/IV/V

SUBJECT: RESULTS OF THE SEPTEMBER 1993 PROJECT MANAGER SURVEY ON COST
BENEFICIAL LICENSING ACTIONS (CBLAs)

Attached are the results of the survey on CBLAs requested of 74 project managers (PMs) in the Divisions of Reactor Projects I/II and III/IV/V. The results were presented at the NRR retreat during the week of September 27, 1993.

The summary of the PM responses are on page 1 of the results. The specific plant information on licensing actions and CBLAs are on pages 2 through 8.

About 50% of the PMs identified CBLAs. The CBLAs were identified only by the number, the reviewer (PM or technical staff), and the average age for the CBLAs associated with each plant. The 158 CBLAs identified represent about 13% of the total inventory of licensing actions as of September 1993. The average age of a CBLA is less than 1 year.

It is interesting to note that only about 25% of the CBLAs are being worked on by the PMs, whereas the overall average for all licensing actions being worked on by PMs is around 40%. It is tempting to conclude from the survey that there are relatively few CBLAs in house, but they are more complex or controversial in nature than the average licensing action.

Several factors, however, may be contributing to inaccuracies in the survey results. First, about 25% of the PMs stated that they did not have sufficient information on costs to identify CBLAs. Second, the definition of CBLAs was subjective (i.e., a licensing action which has a high cost and a low safety significance) and variations in PM's interpretation of "low safety significance" have been noted. Both of these elements probably resulted in a reduced count of CBLAs. Because licensees will be asked to specifically identify their CBLAs, we are working on a more precise definition for both PMs and licensees.

Ledyard B. Marsh, Director
Project Directorate III-1
Division of Reactor Projects III/IV/V

Attachment: CBLA Survey Results

cc: J. Partlow	J. Wiggins	J. Zwolinski
S. Varga	B. Boger	A. Thadani
J. Roe	F. Congel	M. Virgilio
J. Calvo	B. Grimes	
G. Lainas	C. Rossi	

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September 28, 1993

RESULTS OF THE PM CBLA SURVEY

Does project manager discuss costs with the licensee:

Generally yes: 07
Generally no: 27
Occasionally: 40 Total: 74 out of 74 PMs
Generally no, but had enough information to choose CBLAs: 13
Did not have enough information on costs to choose CBLAs: 13
Stating they have CBLAs: 41

Number of CBLAs and where are they being worked:

Number of CBLAs identified: 158
 With PM: 48
 With TS: 110
Current Inventory of LAs: 1164 (about 1/8 or 13% are CBLAs)
Average age for CBLAs: 10 months
Oldest age for a CBLA: 13 years

Conclusions:

About 50% of the PMs identified CBLAs
About 25% of the PMs do not have information on costs
About 10% of the LA inventory are identified as CBLAs
About 75% of these CBLAs are being worked by the technical branches

September 28, 1993

PMs RESPONDING TO THE SURVEY BY PLANT

1. Arkansas 1 R. Bevan Generally no discussion of costs
01 LAs/00 MPAs/01 CBLAs (OPM, 1TS, 00mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: Entergy estimates that the CBLA will save them \$1.6M over
the remaining lifetime of their units (ANO-1/2, Waterford-3,
Grand Gulf-1).
- 1a. Arkansas 2 T. Alexion Generally no discussion of costs
01 LAs/00 MPAs/01 CBLAs (OPM, 1TS, 00mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: Entergy estimates that the CBLA will save them \$1.6M over
the remaining lifetime of their units (ANO-1/2, Waterford-3,
Grand Gulf-1).
2. Beaver Valley 1/2 G. Edison Generally no discussion of costs
46 LAs/16 MPAs/09 CBLAs (3PM, 6TS, 13mn)/03 HCHSS (OPM, 3TS, 07mn)
Comments: Stop spending resources on a phantom concern. Wait until
the imagined increase in LAs materializes. I doubt it will
be significant.
3. Big Rock Pt. L. Olshan Occasional discussion of costs
06 LAs/02 MPAs/02 CBLAs (OPM, 2TS, 05mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: None.
4. Braidwood 1/2 R. Assa* Occasional discussion of costs
20 LAs/08 MPAs/03 CBLAs (OPM, 3TS, 07mn)/01 HCHSS (OPM, 1TS, 01mn)
Comments: None. CECO has a task force investigating CBLAs and expects
to make a presentation to the staff in the next couple of
months.
5. Browns Fry 1/2/3 T. Ross Occasional discussion of costs
36 LAs/11 MPAs/05 CBLAs (3PM, 2TS, 09mn)/07 HCHSS (1PM, 6TS, 15mn)
Comments: Does not have enough information on costs for 08 PSLAs, but
believes none are CBLAs.
6. Brunswick 1/2 P. Milano Generally no discussion of costs
52 LAs/16 MPAs/04 CBLAs(OPM, 4TS, 08mn)/03 HCHSS (OPM, 3TS, 15mn)
Comments: None.
7. Byron 1/2 J. Hickman Occasional discussion of costs
18 LAs/08 MPAs/04 CBLAs (1PM, 3TS, 09mn)/01 HCHSS (OPM, 1TS, 01mn)
Comments: Do not have enough information on costs for 05 PSLAs. CECO
has a task force investigating CBLAs and expects to make a
presentation to the staff in the next couple of months.
8. Callaway R. Wharton Generally no discussion of costs
20 LAs/09 MPAs/00 CBLAs (OPM, OTS, 00mn)/04 HCHSS (1PM, 3TS, 07mn)
Comments: None.

9. Calvert Clf 1/2 D. McDonald Generally no discussion of costs
42 LAs, 10 MPAs/00 CBLAs (xxxxxxxxxxxxxxxx)/00 HCHSS (xxxxxxxxxxxxxxxx)
Comments: Does not enough information on costs.
10. Catawba 1/2 R. Martin Occasional discussion of costs
15 LAs/05 MPAs/01 CBLAs (OPM, 1TS, 06mn)/00 HCHSS (xxxxxxxxxxxxxxxx)
Comments: Does not have enough information on costs for 09 PSLAs to
determine if any are HCHSS issues. Tad Marsh has talked
with Duke but there has been a lack of response from the
licensee. Duke is pursuing (has submitted?) a number of
previously approved line-item TS improvements, all with some
cost benefit. These are on track and will be completed
within 6 months.
11. Clinton D. Pickett Occasional discussion of costs
06 LAs/00 MPAs/01 CBLAs (OPM, 1TS, 09mn)/03 HCHSS (3PM, OTS, 11mn)
Comments: Three contingency LAs to avoid unnecessary shutdown and PM
has two draft CBLA with licensee waiting for OK to submit
them.
12. Comanche Peak 1/2 T. Bergman Occasional discussion of costs
17 LAs/00 MPAs/02 CBLAs (OPM, 2TS, 03mn)/02 HCHSS (OPM, 2TS, 04mn)
Comments: None.
(Comanche Peak 2 B. Holian)
13. D.C. Cook 1/2 B. Wetzel Occasional discussion of costs
11 LAs/02 MPAs/00 CBLAs (OPM, OTS, 00mn)/02 HCHSS (OPM, 2TS, 09mn)
Comments: Expects licensee to submit CBLAs with more emphasis on these
issues.
14. Cooper H. Rood Occasional discussion of costs
03 LAs/00 MPAs/00 CBLAs (OPM, OTS, 00mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: None.
15. Crystal River 3 H. Silver Occasional discussion of costs
16 LAs/08 MPAs/00 CBLAs (OPM, OTS, 00mn)/06 HCHSS (OPM, 6TS, 11mn)
Comments: Subtracting TSIP, the average age for HCHSS would be 04
months.
16. Davis Besse J. Hopkins Generally no discussion of costs
25 LAs/09 MPAs/02 CBLAs (OPM, 2TS, 12mn)/02 HCHSS (OPM, 2TS, 07mn)
Comments: This is a very grey area with a number of requested license
amendments are high cost only when something happens.
17. Diablo Canyon 1/2 S. Peterson Occasional discussion of costs
17 LAs/05 MPAs/02 CBLAs (1PM, 1TS, 07mn)/01 HCHSS (1PM, OTS, 02mn)
Comments: Does not enough information on costs on 03 PSLAs.

18. Dresden 2/3 J. Stang Generally has discussions of costs
43 LAs/14 MPAs/14 CBLAs (10PM, 4TS, 12mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: None. CECO has a task force investigating CBLAs and expects
to make a presentation to the staff in the next couple of
months.
19. Duane Arnold R. Pulsifer Occasional discussion of costs
13 LAs/00 MPAs/00 CBLAs (OPM, 1TS, 00mn)/02 HCHSS (OPM, 2TS, 05mn)
Comments: None.
20. Farley 1/2 T. Reed Generally has discussions of costs
19 LAs/04 MPAs/05 CBLAs (OPM, 5TS, 12mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: 3 out of 5 CBLAs are for approval of an alternate tube
plugging criteria.
21. Fermi 2 T. Colburn Occasional discussion of costs
22 LAs/09 MPAs/00 CBLAs (OPM, OTS, 00mn)/03 HCHSS (1PM, 2TS, 15mn)
Comments: The PSLA assigned to the PM is scheduled for completion by
10/31/93.
22. Fitzpatrick B. McCabe* Generally no discussion of costs
24 LAs/05 MPAs/00 CBLAs (OPM, OTS, 00mn)/09 HCHSS (3PM, 6TS, 06mn)
Comments: None.
23. Fort Calhoun S. Bloom Occasional discussion of costs
10 LAs/02 MPAs/01 CBLAs (OPM, 1TS, 29mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: None.
24. Ginna A. Johnson Occasional discussion of costs
28 LAs/12 MPAs/03 CBLAs (OPM, 3TS, 36mn)/05 HCHSS (OPM, 5TS, 20mn)
Comments: None.
25. Grand Gulf 1 P. O'Connor Generally has discussion of costs
16 LAs/06 MPAs/05 CBLAs (1PM, 4TS, 01mn)/03 HCHSS (3PM, OTS, 04mn)
Comments: Technical branches should follow Murley policy guidance and
review CBLAs instead of refusing to act on them or rolling
them into endless generic reviews.
26. Haddam Neck A. Wang Occasional discussion of costs
19 LAs/01 MPAs/02 CBLAs (OPM, 2TS, 18mn)/01 HCHSS (OPM, 1TS, 03mn)
Comments: None.
27. Harris 1 N. Le Generally no discussion of costs
18 LAs/06 MPAs/00 CBLAs (OPM, OTS, 00mn)/01 HCHSS (OPM, 1TS, 04mn)
Comments: None.
28. Hatch 1/2 K. Jabbour Generally has discussions on costs
15 LAs/10 MPAs/00 CBLAs (OPM, OTS, 00mn)/05 HCHSS (OPM, 5TS, 06mn)
Comments: The PSLAs are TS changes for (1) IST, (2) Part 20, RETS, (3)
vacuum breakers.

29. Hope Creek S. Dembek Generally no discussion of costs
 16 LAs/05 MPAs/06 CBLAs (2PM, 4TS, 08mn)/00 HCHSS (OPM, OTS, 00mn)
 Comments: Don't usually discuss cost benefit of license amendment requests with licensee. Do not have cost data on 2 PSLAs.
30. Indian Point 2 F. Williams Generally no discussion of costs
 05 LAs/00 MPAs/00 CBLAs (xxxxxxxxxxxxxxxx)/00 HCHSS (xxxxxxxxxxxxxxxx)
 Comments: Does not have enough information on costs. Licensee has provided cost information on upgrading equipment for RG 1.97 (\$6 million) but PM does not believe this issue is CBLA. Issue is being reviewed.
- 30a. Indian Point 3 N. Conciella Occasional discussion on costs
 14 LAs/06 MPAs/02 CBLAs (OPM, 2Ts, 06mn)/06 HCHSS (6PM, OTS, 06mn)
 Comments: For an accurate count, you need information on PSLAs that have been completed (e.g., over past 2 years). The response to the questions on the average age gives no indication of how long the review may take.
31. Kewaunee R. Laufer Generally no discussion of costs
 17 LAs/09 MPAs/00 CBLAs (xxxxxxxxxxxxxxxx)/00 HCHSS (xxxxxxxxxxxxxxxx)
 Comments: Does not have enough information on costs.
32. LaSalle 1/2 J. Kennedy Generally no discussion of costs
 36 LAs/18 MPAs/00 CBLAs (xxxxxxxxxxxxxxxx)/00 HCHSS (xxxxxxxxxxxxxxxx)
 Comments: Does not have information on costs. CECO has a task force investigating CBLAs and expects to make a presentation to the staff in the next couple of months.
33. Limerick 1/2 F. Rinaldi Generally no discussion of costs
 34 LAs/02 MPAs/10 CBLAs (2PM, 8TS, 07mn)/00 HCHSS (xxxxxxxxxxxxxxxx)
 Comments: Does not have cost information on the 20 PSLAs not considered CBLAs.
34. Maine Yankee E. Trotter Generally no discussion of costs
 13 LAs/08 MPAs/00 CBLAs (OPM, OTS, 00mn)/00 HCHSS (OPM, OTS, 00mn)
 Comments: Comment implies he doesn't have enough information on costs.
35. McGuire 1/2 V. Nerses Occasional discussion of costs
 26 LAs/04 MPAs/02 CBLAs (OPM, 2TS, 08mn)/00 HCHSS (xxxxxxxxxxxxxxxx)
 Comments: Does not have enough information on costs for 18 PSLAs.
36. Millstone 1 J. Andersen Occasional discussions of costs
 07 LAs/00 MPAs/01 CBLA (OPM, 1TS, 13yr)/01 HCHSS (OPM, 1TS, 05mn)
 Comments: None.
- 36a. Millstone 2 G. Vissing Occasional discussion of costs
 16 LAs,07 MPAs/01 CBLAs (1PM, OTS, 10mn)/01 HCHSS (OPM, 1TS, 04mn)
 Comments: None.

- 36b. Millstone 3 V. Rooney Occasional discussions of costs
 19 LAs/07 MPAs/00 CBLAs (OPM, OTS, 00mn)/04 HCHSS (2PM, 2TS, 06mn)
 Comments: I am including extension of surveillance requirements as
 beneficial to the licensee but not of low safety
 significance.
37. Monticello R. Samworth Generally no discussion of costs
 05 LAs/00 MPAs/03 CBLAs (3PM, OTS, 03mn)/02 HCHSS (OPM, 2TS, 12mn)
 Comments: None.
38. NMP-1 D. Brinkman Occasional discussion of costs
 02 LAs/00 MPAs/00 CBLAs (OPM, OTS, 00mn)/00 HCHSS (does not know)
 Comments: Neither of the 2 PSLAs are CBLAs. Both are safety related
 issues: ISI program review and equivalent margin analysis
 review.
- 38a. NMP-2 J. Menning Generally no discussion of costs
 16 LAs/07 MPAs/00 CBLAs (OPM, OTS, 00mn)/09 HCHSS (4PM, 5TS, 04mn)
 Comments: None.
39. North Anna 1/2 L. Engle Generally has discussions of costs
 54 LAs/20 MPAs/08 CBLAs (4PM, 4Ts, 05mn)/26 HCHSS (10PM, 16TS, 12mn)
 Comments: This does not include 08 CBLAs already closed.
40. Oconee 1/2/3 L. Wiens Occasional discussion of costs
 37 LAs/06 MPAs/00 CBLAs (xxxxxxxxxxxxxxxx)/00 HCHSS (xxxxxxxxxxxxxxxx)
 Comments: Does not have enough information on costs, but does not
 believe there are any CBLAs. Most LAs are reliefs, TS
 amendments to improve TS, and topicals to improve analyses.
41. Oyster Creek A. Dromerick Occasional discussions of costs
 18 LAs/09 MPAs/00 CBLAs (OPM, OTS, 00mn)/01 HCHSS (OPM, 1TS, 11yr)
 Comments: None.
42. Palisades A. Hsia Occasional discussion of costs
 10 LAs/02 MPAs/00 CBLAs (OPM, OTS, 00mn)/03 HCHSS (1PM, 2TS, 18mn)
 Comments: None.
43. Palo Verde 1/2/3 C. Trammell/Tran Occasional discussion of costs
 12 LAs/09 MPAs/03 CBLAs (2PM, 1TS, 1.6yr)/00 HCHSS (OPM, OTS, 00mn)
 Comments: None.
44. Peach Bottom 2/3 J. Shea Generally no discussion of costs
 12 LAs/00 MPAs/02 CBLAs (2PM, OTS, 07mn)/06 HCHSS (2PM, 4TS, 07mn)
 Comments: Licensee interested in making a presentation to the
 staff/CBLA task force on their approach. They would like to
 meet 10/4 or 5/93.
45. Perry 1 R. Stransky Generally no discussion of costs
 21 LAs/00 MPAs/02 CBLAs (OPM, 2TS, 05mn)/00 HCHSS (xxxxxxxxxxxxxxxx)
 Comments: Does not have cost information on 19 PSLAs.

46. Pilgrim 1 R. Eaton Occasional discussion of costs
04 LAs/01 MPAs/02 CBLA (OPM, 2TS, 04mn)/00 HCHSS (xxxxxxxxxxxxxxxxx)
Comments: Does not have enough information on costs.
47. Point Beach 1/2 A. Gody Generally no discussions of costs
44 LAs/04 MPAs/00 CBLAs (xxxxxxxxxxxxxxxxx)/00 HCHSS (xxxxxxxxxxxxxxxxx)
Comments: Does not have enough information on costs.
48. Prairie Isld 1/2 M. Gamberoni Occasional discussion of costs
15 LAs/07 MPAs/00 CBLAs (OPM, OTS, 00mn)/00 HCHSS (xxxxxxxxxxxxxxxxx)
Comments: Does not have enough information on costs for any of the
current LAs. Licensee setting up a group to look for CBLAs.
49. Quad Cities 1/2 C. Patel Occasional discussion of costs
24 LAs/00 MPAs/02 CBLAs (OPM, 2TS, 21mn)/00 HCHSS (xxxxxxxxxxxxxxxxx)
Comments: Does not have enough information on costs for 22 PSLAs.
CECO has a task force investigating CBLAs and expects to
make a presentation to the staff in the next couple of
months.
50. River Bend 1 E. Baker Occasional discussion of costs
05 LAs/01 MPAs/00 CBLAs (OPM, OTS, 00mn)/04 HCHSS (OPM, 4TS, 16mn)
Comments: None.
51. Robinson 2 B. Mozafari Occasional discussion of costs
05 LAs/03 MPAs/00 CBLAs (OPM, OTS, 00mn)/02 HCHSS (1PM, 1TS, 07mn)
Comments: None.
52. Salem 1/2 J. Stone Generally no discussion of costs
60 LAs/20 MPAs/00 CBLAs (xxxxxxxxxxxxxxxxx)/00 HCHSS (xxxxxxxxxxxxxxxxx)
Comments: Does not have enough information on costs.
53. San Onofre 2/3 M. Fields Occasional discussion of costs
34 LAs/02 MPAs/00 CBLAs (OPM, OTS, 00mn)/00 HCHSS (xxxxxxxxxxxxxxxxx)
Comments: Does not have enough information on costs. Licensee ranks
importance of PSLAs using a combination cost savings, timing
of refueling outages, and complaining of plant departments
for changes. Licensee does not quantify cost in dollars.
54. Seabrook 1 A. DeAgazio Generally no discussion of costs
10 LAs/00 MPAs/04 CBLAs (3PM, 1TS, 04mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: Don't create another cumbersome, unworkable system which
creates more work for PMs. Ask for PMs comments on a
proposed new system.
55. Sequoyah 1/2 D. LaBarge Occasional discussion of costs
12 LAs/00 MPAs/00 CBLAs (xxxxxxxxxxxxxxxxx)/00 HCHSS (xxxxxxxxxxxxxxxxx)
Comments: Does not have enough information on costs.
56. South Texas 1/2 L. Kokajko Occasional discussion of costs
27 LAs/15 MPAs/02 CBLAs (OPM, 2TS, 42mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: Does not have cost information on 02 PSLAs.

57. St. Lucie 1/2 J. Norris Occasional discussion of costs
20 LAs/10 MPAs/00 CBLAs (OPM, OTS, 00mn)/10 HCHSS (does not state)
Comments: None.
58. Summer 1 G. Wunder Generally no discussion of costs
03 LAs/00 MPAs/00 CBLAs (OPM, OTS, 00mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: None.
59. Surry 1/2 B. Buckley Occasional discussion of costs
58 LAs/22 MPAs/14 CBLAs (OPM, 14TS, 03mn)/00 HCHSS (does not know)
Comments: None.
60. Susquehanna 1/2 R. Clark Generally has discussion of costs
09 LAs/02 MPAs/03 CBLAs (1PM, 2TS, 04mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: None.
61. TMI-1 R. Hernan Generally no discussion of costs
10 LAs/00 MPAs/08 CBLAs (7PM/ 1TS/ 15mn)/01 HCHSS (OPM, 1TS, 02mn)
Comments: Many TS amendments are contingency measures that could save
O&M under certain circumstances: snubbers that may be
inoperable before the next outage, raise allowable P/S
leakage before the next outage.
62. Turkey Point 3/4 L. Raghaven Generally no discussion of costs
20 LAs/08 MPAs/02 CBLAs (JPM, 2TS, 03mn)/00 HCHSS (xxxxxxxxxxxxxx)
Comments: Does not have enough information on costs for 10 PSLAs.
63. Vermont Yankee D. Dorman* Generally no discussion of costs
04 LAs/00 MPAs/00 CBLAs (xxxxxxxxxxxxxx)/00 HCHSS (xxxxxxxxxxxxxx)
Comments: Does not have enough information on costs.
64. Vogtle 1/2 D. Hood Occasional discussion of costs
21 LAs/00 MPAs/00 CBLAs (OPM, OTS, 00mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: The licensee has some licensing activities that would be
CBLAs, but no licensing actions in this category. Soil
settlement is an example of a high cost activity.
65. Waterford 3 D. Wigginton Generally no discussion of costs
16 LAs/07 MPAs/00 CBLAs (xxxxxxxxxxxxxx)/00 HCHSS (xxxxxxxxxxxxxx)
Comments: Does not have cost information on PSLAs.
66. Watts Bar 1 P. Tam Occasional discussion of costs
52 LAs/09 MPAs/00 CBLAs (xxxxxxxxxxxxxx)/00 HCHSS (xxxxxxxxxxxxxx)
Comments: Does not have enough information on costs.
67. WNP-2 J. Clifford Occasional discussion of costs
23 LAs/07 MPAs/03 CBLAs (1PM, 2TS, 13mn)/00 HCHSS (OPM, 1TS, 00mn)
Comments: None.
68. Wolf Creek W. Reckley Occasional discussion of costs
05 LAs/00 MPAs/01 CBLAs (1PM, OTS, 08mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: Provided in comments for Diablo Canyon.

69. Zion 1/2 C. Shiraki Generally has discussions on costs
20 LAs/02 MPAs/10 CBLAs (OPM, 10TS, 05mn)/00 HCHSS (OPM, OTS, 00mn)
Comments: CECo has a task force investigating CBLAs and expects to
make a presentation to the staff within the next couple of
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70.

September 28, 1993

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NRR Branch Chiefs, ADT

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It is interesting to note that only about 25% of the CBLAs are being worked on by the PMs, whereas the overall average for all licensing actions being worked on by PMs is around 40%. It is tempting to conclude from the survey that there are relatively few CBLAs in house, but they are more complex or controversial in nature than the average licensing action.

Several factors, however, may be contributing to inaccuracies in the survey results. First, about 25% of the PMs stated that they did not have sufficient information on costs to identify CBLAs. Second, the definition of CBLAs was subjective (i.e., a licensing action which has a high cost and a low safety significance) and variations in PM's interpretation of "low safety significance" have been noted. Both of these elements probably resulted in a reduced count of CBLAs. Because licensees will be asked to specifically identify their CBLAs, we are working on a more precise definition for both PMs and licensees.

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Ledyard B. Marsh, Director
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Division of Reactor Projects III/IV/V

Attachment: CBLA Survey Results

cc:	J. Partlow	J. Wiggins	J. Zwolinski
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