



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

February 15, 1994

MEMORANDUM FOR: ADP Staff  
 FROM: Steven A. Varga, Acting Associate Director for Projects  
 SUBJECT: IMPLEMENTATION OF TRACKING SYSTEM FOR COST BENEFICIAL LICENSING ACTIONS (CBLAs)

REFERENCES: (a) Memorandum from T. Murley to NRR staff, dated June 6, 1993  
 (b) Memorandum from T. Murley to NRR staff, dated September 17, 1993

The CBLA task force, led by Tad Marsh, issued its final report in December 1993. The report included conclusions and recommendations of the group based on eight months of working with the staff and industry on CBLA activities. As recommended by the task force, we have established a small group to oversee and assist in CBLA licensing actions. The group is led by Roy Zimmerman and includes Claudia Craig - primary responsibility for CBLAs; and Eric Leeds - backup. (This group also has responsibility for developing and overseeing completion of the Regulatory Review Group Implementation Plan items assigned to NRR with the primary and backup responsibilities reversed.)

Given the increasing interest in CBLAs by the industry, senior NRC management, the Commission, and congressional offices, NRR Projects needs to be able to accurately track and report the status of CBLA reviews, staff resource needs, and the overall results of burden reduction. To help us effectively monitor staff CBLA efforts, we will track CBLAs using the WISP system. In order to initiate tracking, all Project Managers (PMs) are requested to perform the following steps no later than February 28, 1994. These steps should provide the CBLA group the necessary data to accurately trend and track the status of CBLA activities with a minimum of PM involvement.

1. The new Planned Accomplishment (PA) number for CBLAs is <sup>15542</sup>~~15312~~. The PM should revise the PA number for all CBLAs opened since January 1, 1994, to the new number. All future CBLAs should be categorized using this number. The description below should be used to identify a CBLA.
2. A copy of each licensing action (exemptions, orders, license condition changes, technical specification amendments, and certain commitment changes) should be forwarded to the appropriate division contact for the Technical Specification Screening Panel, within two weeks of receipt by the PM. This panel will continue to review all licensing actions, including CBLAs, for potential generic applicability and will work with the CBLA group in tracking cost information on CBLAs. For those actions which are considered a CBLA, please make a note to that affect on the Amendment Tracking Form.

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3. Project managers are requested to put Roy Zimmerman on the distribution list of all notices for meetings on CBLAs. He or another member of the CBLA group will continue to attend many of these meetings. Also, continue to involve the CBLA group if timeliness or problem resolutions develop.

In the broadest sense, many licensee submittals can be considered CBLAs. Among other reasons, licensees petition for rulemaking and request license amendments and reliefs to conserve resources and increase efficiency. Examples of licensee submittals that offer little or no direct safety benefit but are of economic benefit to a licensee and receive relatively high priority review by the staff include: power uprates, generic technical specification line item improvements, and ISI/IST reliefs. Although these types of submittals can be thought of as CBLAs, the population of licensing actions to be tracked with the new PA number is being reserved solely for those licensing actions that have low safety impact, high licensee cost, and a relatively low NRR priority for review. This is the population of items that was increased from a priority 4 to a priority 3 in the revised NRR priority ranking system dated June 6, 1993. There are also "CBLA-like" licensing actions of low safety impact and some licensee savings that will not receive CBLA categorization as a priority 3. These actions, which do not provide a savings of at least \$100,000, will remain a priority 4, will not be considered a CBLA, and will not have the new PA number.

If a licensing action meets the following guidelines it should be considered a CBLA and should be categorized under the new PA number, 15312:

- The licensing action is initiated by a licensee and requests consideration as a CBLA.\*
- The licensee's submittal is of high quality and provides a sufficient basis to initially support a low safety impact and high cost determination.
- The requested action is prioritized by the licensee with respect to all its licensing actions.\*
- The requested action would not receive NRR review priority 1 or 2.
- The requested action is expected to result in significant licensee cost savings of at least \$100,000 in O&M costs and/or capital expenses over the life of the plant (this does not include replacement power costs).\*
- The requested action may be generic or plant-specific.

\* Need for OMB clearance for request of this information pending. In the interim, if not clearly identified in the licensee's submittal, but it appears to otherwise meet the characteristics of a CBLA, discuss the submittal with a CBLA group member to determine whether the new PA number should be applied.

NRR office procedures will be revised, as appropriate, to address the information provided above. A training and question/answer session for Projects staff will be arranged in the near future. Questions regarding this memorandum should be directed to Roy Zimmerman (504-2969).

Original signed by

Steven A. Varga, Acting Associate Director  
for Projects

cc: T. Murley  
F. Miraglia  
F. Gillespie  
W. Russell  
ADT Branch Chiefs & above  
Regional Division Directors & above

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\*See Previous Concurrence