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POLICY ISSUE (Notation Vote)

March 31, 1994

SECY-94-090

FOR: The Commissioners
FROM: James M. Taylor
Executive Director for Operations
SUBJECT: INSTITUTIONALIZATION OF CONTINUING PROGRAM FOR REGULATORY IMPROVEMENT

PURPOSE:

To obtain Commission approval of policies, framework, and procedures for institutionalizing a continuing program for Regulatory Improvement.

BACKGROUND:

The staff proposed its plans for a periodic review of regulations and elimination of requirements marginal to safety in SECY-92-263 dated July 24, 1992. The plans included initiating, and subsequently institutionalizing, by permanently integrating into the regulatory process an ongoing effort to eliminate requirements marginal to safety (MTS) and reduce regulatory burden. The Commission approved the staff plans in a Staff Requirements Memorandum dated August 26, 1992. This Commission approved program, the implementation of the Regulatory Review Group (RRG) recommendations, and the ongoing Cost Beneficial Licensing Actions (CBLA) initiative satisfy the recent requirement for a periodic review of existing regulations in Section 5 of Executive Order 12866, "Regulatory Planning and Review," of September 30, 1993 by President William J. Clinton.

The staff provided a progress report on the MTS program and informed the Commission of staff efforts for developing the general framework and specific applications for performance-based regulations in SECY-93-028 dated February 5, 1993. The staff discussed institutional issues, the performance-based regulatory framework, and specific applications to three regulations at a

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public workshop on April 27 and 28, 1993. The results of the workshop are documented in NUREG/CP-0129, "Proceedings of the Workshop on Program for Elimination of Requirements Marginal to Safety," September 1993.

The staff also informed the Commission of its plans to obtain practical experience for using PRA technology and safety goals in its efforts for developing performance-oriented and risk-based containment testing and fire protection requirements in SECY-93-232, dated August 20, 1993. The Commission approved the staff's plans and the Chairman, in a memorandum to me dated September 7, 1993, requested a plan of action with commitments through completion of these efforts.

NMSS has a number of continuing programs for regulatory improvement, including major revisions of rules. In SECY-93-268, the staff informed the Commission of NMSS' plan for obtaining a broad range of licensee views on the impact and efficacy of NRC regulation by surveying several hundred materials licensees by mail. The Commission approved the plan, which would have the staff systematically integrate consideration of regulatory impact into the regulatory program. The specific measures proposed in this paper are designed for improvement to reactor regulation and, in many cases, are not as applicable to materials regulation. NMSS will continue its existing programs, and progress on these initiatives will be reported to the Commission as part of this overall effort.

The proposal provided in this paper to institutionalize efforts for regulatory improvement has been coordinated with the development of the task action plan for implementing the recommendations of the Regulatory Review Group (RRG) provided recently to the Commission in SECY-94-003, dated January 7, 1994. This paper also addresses the RRG recommendation that the Marginal to Safety Program be redirected to be responsive to specific petitions that are performance based and eliminate burden, and to develop guidance and procedures to support such an approach (Topic Areas No. 44 and 42 in SECY-94-003). The final report of the Regulatory Review Group was forwarded to the Commission in August 1993.

SUMMARY:

This paper satisfies staff commitments in SECY-92-263 for institutionalizing the subject program and responds to the Chairman's request for a plan of action with commitments through completion of specific efforts for incorporating PRA into the regulatory process, and developing performance-oriented and risk-based regulations for containment leakage testing and fire protection requirements.

Presented herein is the staff's proposal for institutionalizing an ongoing Regulatory Improvement (RI) program to ensure an adequate programmatic, policy, and technical framework are in place for executing the program. The RI program includes activities in the "Marginal to Safety" initiative, staff efforts for reviewing plant specific cost-beneficial licensing actions, and execution of the RRG Implementation Plan. The staff's efforts to develop performance-oriented and risk-based containment testing and fire protection

requirements are outlined and used as examples for a discussion of the proposed plans, procedures and policy issues.

DISCUSSION:

Program Institutionalization

The following is the charter and actions for institutionalizing the program and includes the objective, policies, framework, and procedures for the program.

I. Program Objective

The RI program is aimed at the fundamental principle adopted¹ by the Commission that all regulatory burdens must be justified and that its regulatory process must be efficient. The reasons for seeking to remove regulations and license conditions marginal to safety are to eliminate or modify requirements where burdens are not commensurate with their safety significance and thus to free up licensee and NRC resources and improve the focus and effectiveness of the body of regulations. The activities in this program should result in enhanced regulatory focus in safety significant areas. As a result, an overall net increase in safety is expected from the program.

II. Policies and Framework for Program

II.A Policies

The following policies will be maintained for the conduct of the program:

1. Since the main aim of the program is to increase regulatory efficiency and recognizing that many licensees have technical programs which they may not wish to modify, any revised requirements from this program will be issued for voluntary adoption by licensees that are in compliance with current requirements.
2. Given the history of difficulty and low success rate for attempts to resolve new safety issues simultaneously with improvements to regulatory efficiency, regulatory actions and programs for new safety issues and those for improving regulatory efficiency will be separate and independent.

¹ 57 FR 55156, NRC Principles of Good Regulations, Memorandum from Chairman Selin to the President on Regulatory Review (August 1992), and various Staff Requirements Memoranda.

3. A major component of regulatory efficiency is in the implementation of requirements and licensees are in the best position to assess the effect of regulatory actions and primary beneficiaries of improvements. Considering this and limitations of staff resources, the industry normally is expected to determine and propose areas for improvement including cost/benefit analyses and justifications for modifications. The staff will assign priority to petitions for rulemaking, and proposals for generic modifications to implementing documents (e.g. regulatory guides) and plant-specific actions, based on their completeness for analyses and justifications for action.

II.B. Framework

The program will include the consideration, whenever practical and appropriate, of performance-oriented and risk-based approaches. Requirements or license conditions that are a significant burden on licensees and marginal to safety shall be eliminated or relaxed.

II.B.1 Risk-Based Regulation

Risk-based regulatory approaches are those that use probabilistic risk analyses (PRA) for developing or modifying requirements at any level of detail.

As proposed in SECY-93-232 and approved by the Commission, a methodology will be developed and used to apply PRA technology and safety goals more comprehensively for evaluating regulatory efficiency and coherence. This will include the development of criteria for determining when a regulatory requirement is marginal to safety, to develop methods for using PRA to differentiate between the marginal and the other requirements that should be retained, and to account for uncertainties and limitations in such analysis methods. The results of the staff's efforts currently underway for implementing the safety goals and revising the Regulatory Analysis Guidelines will be used towards developing these criteria. Comparative versus absolute use of PRA results will be stressed.

By the staff commitment in SECY-93-232, a draft NUREG report of these methods and criteria for applying PRA methods and safety goals based on practical experience from efforts to develop performance-oriented and risk-based regulations for containment testing and fire protection requirements is planned to be published for public comment by about August 1995. This NUREG report would serve as a technical supporting document for updating the Regulatory Analysis Guideline discussed later.

II.B.2 Performance-Oriented Approach

As presented to the Commission in SECY-93-028 and discussed at the public workshop conducted on April 27 and 28, 1993, a performance-oriented approach establishes the regulatory safety objective and

acceptance criteria without prescribing the methods or hardware necessary to accomplish the objective and meet the acceptance criteria, and allows licensees the flexibility to use cost-effective methods for implementation. The regulatory safety objectives and acceptance criteria, to the extent practical, will be risk-based.

Consistent with the policy that the regulated industry should play the major role in the RI program, industry will be encouraged to develop standards and guidance documents to be used by licensees for the implementation of the regulatory objectives while maintaining standardized industry practices. Performance-oriented approaches will allow innovation in technology and safety. Performance-oriented approaches will need to ensure a common understanding of regulatory safety objectives and acceptance criteria between licensees and the NRC, and that the new regulation can be objectively inspected and enforced against. New performance-based approaches will need to demonstrate that increases in regulatory efficiency as a result of flexibility given to licensees to use cost-effective methods for implementation outweigh any increase in regulatory burden, for example, for inspection and enforcement.

II.B.3 Types of Modifications and Safety Impact

The regulatory process will be improved by any of the following types of modifications to requirements and practices: (a) Elimination or relaxation of a specific requirement or license condition marginal to safety; and (b) Adoption of a performance-oriented modification in place of prescriptive marginal requirements.

Each modification of a requirement or license condition in the program will be demonstrated to result in marginal or no impact on safety. Comparative risk impact measures with respect to safety goals, if appropriate and feasible, will be used to demonstrate marginal impact on safety. Further details of these measures will be developed as discussed earlier. A net safety benefit from the program resulting from the focus on safety significant areas is expected.

The staff will continue to work with industry to obtain data from operating experience to support risk-based and performance-oriented regulation. Such data is essential to making sound regulatory decisions as we modify and relax deterministic requirements that were established with margins to account for uncertainties in initiating event frequency and system and component reliability.

III. Program Plans, Administration, and Procedures

III.A Review of Proposals for Burden Reduction

As identified in the RRG Implementation Plan Topic 44, the Marginal to Safety Program is being redirected to focus on petitions for rulemaking and proposals for revisions to generic guidance documents. The staff

plans to complete actions it initiated on MTS issues discussed later in this paper, and the RRG Implementation Plan, for its initial effort for the Regulatory Improvement program. As these actions are completed and staff resources examined, the staff will evaluate whether other MTS issues should be pursued proactively or whether the staff should only respond to petitions for rulemaking and proposals for revisions to generic documents.

As part of this future effort, proposals and petitions for burden reduction will be accepted on a continuing basis. The proposals and petitions will be reviewed and prioritized, and actions initiated based on their completeness and merit, extent of burden reduction, and available staff resources. Also, as proposed (in SECY-92-263) to and approved by the Commission, a reassessment of existing NRC regulatory requirements and practices may be conducted in the program pending availability of staff resources. This recognizes that the need and economic burden of some existing regulatory requirements may not have been accurately predicted when adopted or may diminish with new technology and information. These ongoing initiatives and review of existing regulations satisfies the requirement in Section 5 of Executive Order 12866, "Regulatory Planning and Review," dated September 30, 1993, and discussed in a memorandum from the General Counsel to the Commissioners dated November 8, 1993.

The planned continuing effort will consist of the following actions.

1. Prioritize proposals and petitions to reduce or eliminate requirements.
2. Initiate staff evaluation of proposals and petitions prioritized by the staff to have demonstrated the highest potential for burden reduction with marginal impact on safety.
3. Based on the staff evaluations, publish proposed NRC actions for public comment, and issue final actions.

At the end of an appropriate period the staff will summarize the proposals and petitions received and the actions that have been issued or are undergoing evaluation. In addition, the staff will solicit additional petitions and proposals from the regulated industry and the public, and public and industry input will be solicited at public workshops to adjust NRC priorities and for determining NRC actions. Future RES Office Letters will develop further details of the petition and prioritization process.

Given the infancy of this program and associated policies, rulemaking to formally establish a systematic process (discussed in SECY-92-263 and SECY-93-028) for reviewing and addressing existing requirements will not be initiated at this time. This mechanism for further institutionalizing the program into the regulatory framework will be

reconsidered at the end of the first review period in August 1995 once the program achieves some maturity.

III.B Administration and Procedures

III.B.1 Interactions With the Industry and Public

Industry, as the regulated entity, will be expected to play the major role in the program since they are in the best position to develop details of the effects, particularly economic burden, resulting from the implementation of requirements. Industry will be expected to provide data and operational experience necessary for assessing regulatory burden and safety, conduct pilot programs when beneficial or necessary to verify feasibility and efficiency of new regulatory approaches, and submit comprehensive proposals and petitions on its own initiative. A formal process will be established and used to interact, through correspondence and/or public meetings, with prospective petitioners from the regulated industry and public, to minimize uncertainty regarding acceptability of potential modifications prior to their expenditure of extensive resources for developing a comprehensive petition or proposal. This process of interaction will continue through the preparation of the petition in order to facilitate closure on issues and potential modifications, and ensure fruition of efforts. The revisions to the current Commission's rule and policies for petitioning discussed later will include the adoption of these processes for staff interaction with prospective petitioners.

The Office of Nuclear Reactor Regulation will perform the reviews of requests for plant-specific cost beneficial licensing actions, and the Office of Nuclear Regulatory Research will provide the lead role for rulemakings and changes to generic documents such as regulatory guides. A review will be conducted to determine plant specific versus generic staff action and for determining staff priorities through periodic inter-office coordination meetings. In order to provide incentives to utilities for developing innovative new technical methods and approaches, a limited number of meritorious proposals and requests for plant-specific licensing actions may be processed and granted even though generic actions, e.g. rulemaking, are ongoing. These proposals will be considered based on timeliness (proposals are preferred in early stages of generic actions), limited to the first few that propose new innovative approaches and methods, and used to optimize expenditure of staff resources.

Public workshops, similar to the, "Marginal to Safety" workshop conducted on April 27 and 28, 1993, will be held as appropriate to provide status of program activities, and for the development of general regulatory and technical approaches. Workshops will also be conducted, as necessary, for each specific issue.

III.B.2 Regulatory Improvement Management Control System

The prioritization and resolution of generic and plant specific licensing actions, rulemakings, other regulatory activities, and the relationships between plant specific and generic actions will be monitored and tracked. The Generic Issues Management Control System (GIMCS) will be used to track modifications of guidance documents in RES (other than rulemakings), rulemakings will be tracked as part of the overall RES rulemaking monitoring system, and plant-specific actions will be tracked in the present system used for tracking licensing actions. Each program office will be responsible for tracking actions in their respective offices. Coordination meetings between the technical staff of program offices involved in RI activities will be periodically conducted to integrate technically related staff activities for regulatory efficiency improvement, e.g., RRG implementation, "Marginal to Safety" issues, and PRA applications.

A periodic status report of regulatory improvement activities will be made available to the public, the Commission and ACRS.

III.B.3 Procedures and Guidelines

The staff proposes to modify § 2.802 of 10 CFR Part 2, Petition for Rulemaking, to provide guidance on the scope and level of detail needed on petitions for rulemaking to reduce regulatory burden. The revised § 2.802 will distinguish between requirements for petitions for rulemaking potentially affecting safety and petitions that focus on reducing regulatory burden. The requirements for the latter petitions will be proposed to be consistent with the requirements on the staff for proposed rulemaking. The staff has determined a revision to § 2.802 is necessary. The staff plans to publish a proposed rule in six months, and a final rule in fourteen months, following Commission approval of the rulemaking. This effort addresses RRG Implementation Plan Topic 42, as documented in SECY-94-003.

In addition the following administrative framework will be established and maintained for conducting rulemakings and revisions of guidance documents.

1. Procedures or processes for the monitoring, controlling and reporting on individual initiatives.
2. RES Office letters for the prioritization and resolution of actions for improving regulatory efficiency.
3. Guidance documents on content of industry submittals and petitions for rulemaking.

4. RES office procedures for interaction with the regulated industry and public, including process for early dialogue between the staff and prospective petitioner on complex issues.
5. Updated Regulatory Analysis Guidelines for regulatory activities including criteria for determining requirements marginal to safety.

The first four documents will be developed in six months following Commission approval of this paper. The Regulatory Analysis Guidelines will be proposed by August 1995 along with a draft NUREG report on methods for applying PRA and Safety Goals to regulatory improvement activities discussed earlier.

Plan of Action and Status of Staff Efforts for
Developing Performance-Oriented and Risk-Based
Containment Testing and Fire Protection Regulations

Existing containment testing and fire protection requirements were proposed by the NRC (57 FR 4166) on February 4, 1992 as potential candidate areas for modification to make the regulations less prescriptive and more performance-oriented and risk-based. Based on staff analyses of public comments on the proposals (SECY-92-263), the Commission approved and announced (57 FR 55156) its plans to initiate rulemaking for developing performance-oriented and risk-based regulations for containment testing and fire protection requirements. In January 1993, the staff published (58 FR 6196) a general framework for developing performance-oriented and risk-based regulations and specific proposals for modifying containment testing and fire protection requirements for discussion at a public workshop on April 27 and 28, 1993. Industry and public comments on the proposals, and other recommendations and innovative ideas provided at the public workshop, have been documented in a proceedings of the workshop (NUREG/CP-0129, September 1993).

The staff plans to maintain and follow the policies, framework and procedures discussed earlier in the conduct of these two rulemakings, namely: (1) The rules will be promulgated for voluntary adoption by current licensees; (2) New safety issues that may arise in these areas will be addressed separately in current staff programs, such as the Generic Safety Issues program; and (3) Industry will be expected to play a major role in developing data on cost and operational experience, and guidance documents for implementing the risk-based regulatory safety objectives established by the staff. PRA technology and safety goals will be used in developing safety objectives and guidance documents. A key success criterion for the new performance-oriented approach will be whether it can ensure a common understanding of requirements between the licensees and the NRC, and if the new regulation and/or implementation document can be objectively inspected and enforced against.

Containment Testing:

In SECY-94-036, "Staff Plans for Revising 10 CFR Part 50, Appendix J, "Containment Leakage Testing," and for Handling Exemption Requests," dated February 17, 1994, the staff informed the Commission of the specific modifications to Appendix J the staff is pursuing. The following provides details of the plan of action and schedule for the Appendix J rulemaking. Figure 1 summarizes the plan of action and shows the schedule for completing the modification of containment testing requirements. Following the public workshop in April 1993, the staff has had several discussions with NUMARC and several utilities for compiling data on containment testing experience and cost impact of current requirements. Virginia Electric Power Company (North Anna) and Entergy Operations (Grand Gulf) have freely provided the staff with extensive data on their experiences on containment testing. NUMARC has provided the staff with containment testing data from a full spectrum of plants.

The staff is currently near completion of a study on an assessment of containment testing experience, and evaluation of the risk significance and impact of performance-oriented requirements for determining acceptance criteria and intervals for containment testing. This study will form the technical bases for recommended modified requirements. The new rule will be performance-oriented and will establish high level safety objectives and criteria. NUMARC has initiated development of an industry standard that will provide implementation methods of the safety objectives. NUMARC plans to use a performance-based testing proposal developed by Grand Gulf as the bases of the guidance document. A pilot program to examine the feasibility and efficiency of the performance-based regulation and implementation documentation is planned at the Grand Gulf nuclear power station. The staff is also presently reviewing an exemption request from Grand Gulf to allow performance-based containment testing. Based on the completion of a draft industry guidance document, targeted for June 1994, the staff expects to provide the proposed rulemaking package to the Commission by July 1994. Based on the publication of a proposed rule in August 1994, and revision of the industry guidance document by December 1994, the staff expects to provide the Commission with a proposed final rule by March 1995. The staff plans close coordination with NUMARC, through bi-monthly meetings, to ensure timely completion of this effort.

As discussed in SECY-94-036, the staff does not propose to change the basis for determining the value of the allowable containment leak rate, as part of the Appendix J revision, due to the complexity of that modification and its potential to delay the rule revision. The methodology used to establish the allowable leakage rate will be modified as part of the staff's efforts (see Figure 2 for schedule) for revising source terms and updating regulatory guides (R.G.s 1-3 and 1-4) for calculating doses to the public. The staff plans to provide the Commission with final proposed revisions to documents used for calculating allowable containment leakage rate by April 1996.

Fire Protection:

The plan of action for this rulemaking, particularly for submitting a proposed rule to the Commission, is contingent on the resolution of the current thermo-lag issue by licensees. The staff informed the Commission, in SECY-93-028, and subsequently the public and industry through several public notices and at public workshops and meetings, that rules revised in this program for increasing regulatory efficiency will be available for voluntary adoption by licensees that are already in compliance with current regulations. Since many licensees are currently not in compliance with present fire protection requirements because of the thermo-lag issue, and would therefore not be able to take advantage of the revised rule, the staff recommends that the proposed rule be published following the resolution of current compliance issues. However, in the meantime, the staff plans to continue its studies in this area and be prepared to proceed with the rulemaking.

Figure 3 summarizes the re-adjusted plan of action, relative to previous commitments in SECY-92-263, and shows the anticipated schedule for completing modifications of fire protection requirements. In July 1993, the staff initiated a study to review initiatives for performance-oriented fire protection regulation in other industries in the U.S. and abroad, and in the nuclear industry in other countries. The aim is to verify the feasibility and formulate a framework, acceptance criteria, and evaluation methods for a performance-oriented and risk-based fire protection rule based on available methods and experiences gained in other previous initiatives.

In SECY-93-143, dated May 21, 1993, the staff informed the Commission of staff actions to address the recommendations in the report on Reassessment of the NRC Fire Protection Program. The current plan is to complete the Fire Protection Task Action by the end of 1997. As indicated earlier, and consistent with the policies recommended for the Regulatory Improvement program, new safety issues that may arise as a result of implementing the Fire Protection Task Action plan, will be evaluated, and backfit requirements developed, separate and independent from efforts to improve regulatory efficiency in the fire protection area. If necessary and appropriate, performance-based approaches would be used to promulgate new requirements justified by a backfit analysis.

The industry, through NUMARC, established an ad hoc committee (AHAC) in October 1992 with the objective of developing a petition for rulemaking. NUMARC informed the staff of their efforts and intent to file a petition in the public workshop on April 27 and 28, 1993. Recently, they have notified the staff of their plans to file a petition for rulemaking to modify NRC fire protection requirements in early 1994. At NUMARC's request, the staff has held three pre-filing meetings to discuss the petition. Upon receipt of the petition, the staff plans to follow necessary routine procedures for processing the petition and expects to outline a proposed rule to and discuss its features with the Commission by May 1995 pending resolution of the thermo-lag issue. The staff study discussed above will be used as a basis to review the petition and determine the feasibility and effectiveness of proposed approaches.

As currently conceived, the proposed rule will establish high level regulatory safety objectives and criteria that will be supported by guidance documents on methods to demonstrate achievement of the objectives and criteria. NUMARC is expected to propose guidance documents and industry standards in the petition for rulemaking. Plant-specific pilot studies are planned to examine the feasibility and efficiency of the performance-based regulation and implementation documents. Following receipt of the guidance documents, the staff expects to submit a final rulemaking package to the Commission by June 1996.

In parallel with a NUMARC test program to define the fire resistive rating of various upgrades to thermo-lag fire barriers, several licensees are considering alternative approaches to resolving this issue. One approach, proposed by Florida Power and Light (FPL), includes a combination of deterministic and risk methods to establish the fire resistive rating of fire barriers located within a fire area. NRR is currently evaluating the Florida Power and Light proposal and other alternatives and will be making a recommendation to the Commission on the alternative proposed by FPL and other acceptable approaches to resolving the thermo-lag issue. These activities may have an influence on the NUMARC approach and schedule for rulemaking.

Resource Implications:

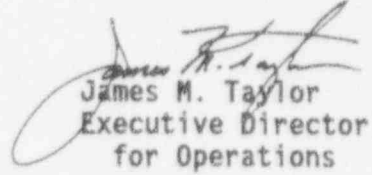
Resources for this program are included in the Five Year Plan. Updating of the Five Year Plan will discuss the specific activities planned and completed in this program. Resources will be adjusted in light of petitions and proposals received and other staff priorities.

Coordination:

The Office of General Counsel has no legal objection to this paper and the Advisory Committee on Reactor Safeguards has been forwarded a copy of this paper for their information.

Recommendation:

That the Commission approve the: (1) Proposed policies, framework, and procedures for institutionalizing a continuing program for regulatory efficiency improvement; and (2) Staff plans for modifying § 2.802 of 10 CFR Part 2, Petition for Rulemaking as a supporting element of the continuing program.


James M. Taylor
Executive Director
for Operations

Commissioners' comments or consent should be provided directly to the Office of the Secretary by COB Thursday, April 14, 1994.

Commission Staff Office comments, if any, should be submitted to the Commissioners NLT Thursday, April 7, 1994, with an information copy to the Office of the Secretary. If the paper is of such a nature that it requires additional review and comment, the Commissioners and the Secretariat should be apprised of when comments may be expected.

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Figure 1

Schedule for Modifications to
Containment Testing Requirements

8/92	4/93	5/93	2/94	3/94	6/94	7/94
Commission approval/ Initiated Rulemaking	Public Workshop	Staff/ NUMARC Discussions on Compiling Industry Data	Operational Experience/ Cost Data from NUMARC - NUMARC Initiate Development of Guidance Document	Proposed Rule to ACRS/PDR	Final draft of NUMARC Guidance Document to Staff - Guidance Document to ACRS/PDR	Staff/ Industry Meeting with ACRS - Proposed Rule to Commission
8/94	12/94	2/95	3/95	4/95		
Publish Proposed Rule for Comment	Revised Final Draft of NUMARC Guidance Document to Staff	Final Rule to ACRS/PDR	Final Rule to Commission - Staff/Industry Meeting with ACRS	Publish Final Rule		

Figure 2

Schedule for Revising Documents on
Calculations of Containment Leakage Rate

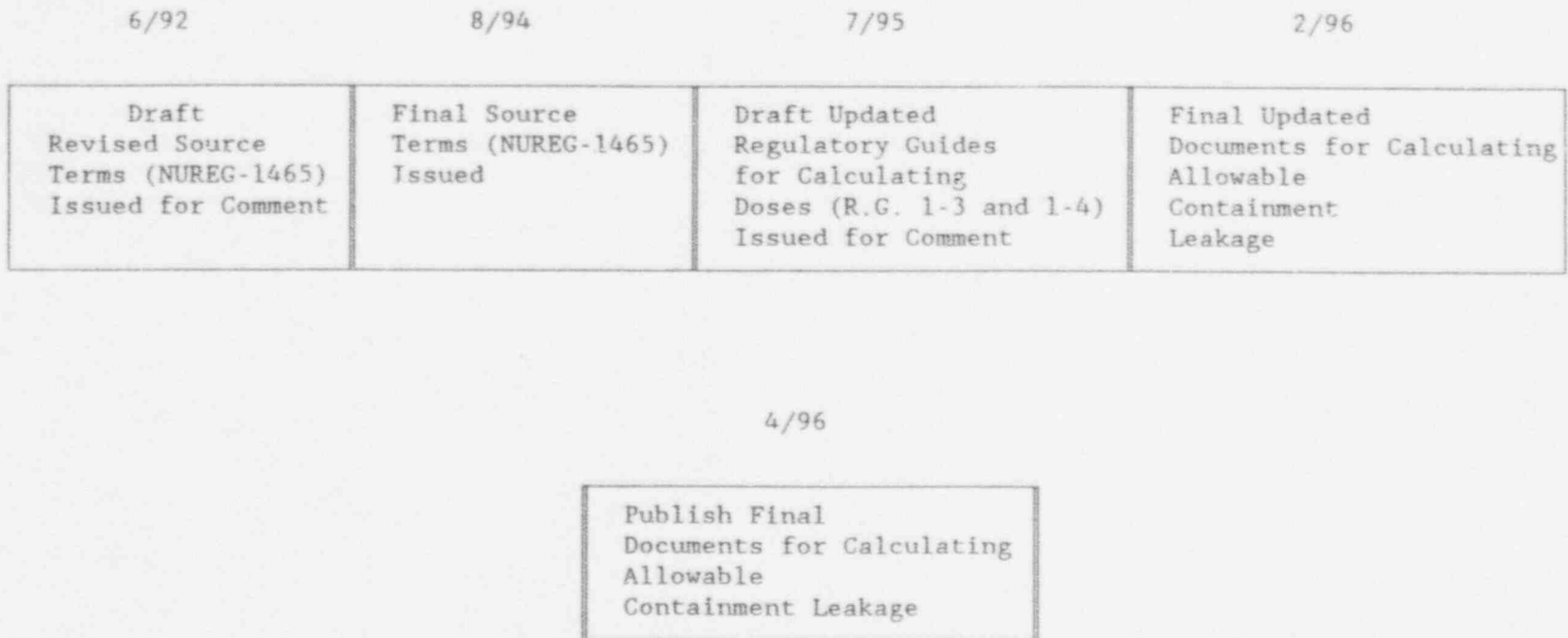


Figure 3

Schedule for Modifications to
Fire Protection Requirements

8/92	4/93	10/93-1/94	5/94	3/95	5/95	7/95
Commission approval/ Initiated Rulemaking	Public Workshop	Staff/ NUMARC Pre-Filing Discussions on Proposed Petition	NUMARC Petition for Rulemaking Publish Notice of Receipt of Petition	Proposed Rule to ACRS/PDR	Proposed Rule to Commission	Publish Proposed Rule for Comment
12/95	4/96	6/96	8/96			
Final draft of NUMARC Guidance Documents	Final Rule to ACRS/PDR	Final Rule to Commission	Publish Final Rule			