MEMORANDUM FOR: Dennis M. Crutchfield, Associate Director

for Advanced Reactors and License Renewal

Office of Nuclear Reactor Regulation

FROM:

Scott F. Newberry, Director

License Renewal and Environmental Review

Project Directorate

Associate Directorate for Advanced Reactors

and License Renewal

Office of Nuclear Reactor Regulation

SUBJECT:

GENERIC SAFETY ISSUES, IMPLICATIONS FOR LICENSE RENEWAL

(YELLOW TICKET 0940115)

By memorandum dated May 5, 1994, the Office of Nuclear Regulatory Research (RES) informed the Office of Nuclear Reactor Regulation (NRR) that the RES review of Generic Safety Issues (GSIs) prioritized and/or resolved between October 1990 and March 1994 relating to license renewal was completed. This review was performed at the request of NRR and is consistent with the license renewal rule statements of consideration which state that GSI resolution started or in progress after October 1990 would "...examine renewal-term effects as part of the original issue resolution process." RES recently modified the GSI resolution process to include consideration of license renewal term effects. All GSIs prioritized and/or resolved after March 1994 will be reviewed under this new process.

RES reviewed 84 GSIs prioritized and/or resolved between October 1990 and March 1994, and found that consideration of license renewal would not affect their prioritization or resolution. My staff has briefly reviewed RES's memorandum and finds it acceptable for license renewal.

Original signed by:

Scott F. Newberry, Director
License Renewal and Environmental Review
Project Directorate
Associate Directorate for Advanced Reactors
and License Reneval
Office of Nuclear Keactor Regulation

cc: W. Russell

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06/7/94	06/7/94	06/ /94	06/8/94	06/ /94

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TICKET NO: 0940115

DOC DT: 05/05/94

NRR RCVD DATE: 05/24/94

E. ECKJORD, RES

TO:

W. T. RUSSELL

FOR SIGNATURE OF :

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DESC:

ROUTING:

LICENSE RENEWAL IMPLICATIONS OF GENERIC SAFETY ISSUES (GSI'S) PRIORITIZED AND/OR RESOLVED BETWEEN OCTOBER 1990 AND MARCH 1994

RUSSELL MIRAGLIA REYES THADANI GILLESPIE BOHRER

ASSIGNED TO:

CONTACT:

DAR

CRUTCHFIELD

Received 5/24/94

AL INSTRUCTIONS OR REMARKS:

ACTION

DUE TO NAR DIRECTOR'S CHAP

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June 14, 194

lease review the due date immediately:

f the due date does not allow adequate time, please contact eleste Smyre on 504-1229, or E-mail(CDS) to request/revise a ue date. The NRR mailroom is located in room 12G18.

lease do not hand carry concurrence packages to the Directors ffice without first going through the NRR mailroom.

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# UNITED STATES NUCLEAR REGULATORY COMMISSION

M-DMC

WASHINGTON, D.C. 20655-0001

MAY 0 5 1994

MEMORANDUM FOR:

William Russell, Director

Office of Nuclear Reactor Regulation

FROM:

Eric S. Beckjord, Director

Office of Nuclear Regulatory Research

SUBJECT:

LICENSE RENEWAL IMPLICATIONS OF GENERIC SAFETY ISSUES (GSIs)

PRIORITIZED AND/OR RESOLVED BETWEEN OCTOBER 1990 AND MARCH

1994

RES has completed its review of generic issue actions related to license renewal, as committed in my memorandum to you on March 23, 1994. Our comprehensive review of all GSIs prioritized and/or resolved up to October 1990 showed that consideration of a license renewal period of twenty years did not change the staff's resolution of these issues; this review was documented in NUREG/CR-5382. With the issuance of the Rule on Nuclear Power Plant License Renewal (56 FR 64943, December 13, 1991), GSI resolution efforts started or in progress after October 1990 were to "... examine renewal-term effects as part of the original issue resolution process."

RES has reviewed the 84 generic issues that were prioritized and/or resolved between October 1990 and March 1994 and found that the conclusions reached on the 80 GSIs will not change with the consideration of a license renewal period of twenty years. The remaining 4 issues were classified as non-safety issues with no impact on license renewal: three Licensing Issues (A-19, 147, 148) and one Regulatory Impact Issue (155.2). With respect to the prioritization of the issues, the reevaluation considered the additional 20-year license renewal term (an approximate factor of two increase in the potential risk reduction) and the revised prioritization guidelines proposed in SECY-93-108 and approved by the Commission. These guidelines raised the threshold for HIGH and MEDIUM priority GSIs. A summary of the RES findings on the 80 GSIs is listed in Enclosure 1 to this memorandum. Enclosure 2 provides a list of the 21 GSIs that have been through the resolution process.

It should be noted that the license renewal period was considered in the impact/value analyses for 6 of the 80 GSIs listed in Enclosure 1; an additional 6 GSIs are undergoing resolution and will have to address license renewal in accordance with RES Office Letter No. 3. However, in order to facilitate the NRR identification of GSIs for consideration in plant license renewal applications, RES will revise the Introduction of NUREG-0933 to reflect: (1) the findings of NUREG/CR-5382; and (2) the RES findings for those GSIs completed between October 1990 and March 1994. RES Office Letters No.

allow (10365)

MAY 05 1994 license renewal analyses will m

William Russell

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I and 3 have been revised to include a line item on license renewal and future prioritization evaluations and resolution regulatory analyses will more clearly state the impacts on license renewal.

Eric S. Beckjord, Director Nuclear Regulatory Research

#### Enclosures:

- 80 GSIs Prioritized and/or Resolved Between October 1990 and March 1994
- 2. 21 GSIs Resolved Between October 1990 and March 1994
- cc: D. Crutchfield
  - S. Newberry
  - S. Reynolds
  - M. Malsch
  - J. Milhoan
  - J. Moulton

- Failure of Protective Devices on Essential Equipment
  License renewal was not considered in the prioritization of this
  issue which was placed in the DROP category because of its
  negligible risk reduction potential. Consideration of license
  renewal did not change the priority of the issue.
- Automatic ECCS Switchover to Recirculation
  License renewal was not considered in the MEDIUM priority ranking of
  this issue but, in accordance with RES Office Letter No. 3, will be
  addressed during resolution.
- Bolting Degradation or Failure in Nuclear Power Plants
  License renewal was not considered in the HIGH priority ranking of
  this issue which was resolved with no backfit based on the actions
  taken by licensees to address the safety concern. Consideration of
  license renewal did not affect this resolution.
- Potential Recirculation System Failure as a Consequence of Ingestion of Containment Paint Flakes or Other Fine Debris License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on a finding of insignificant risk in the plant analyses of Comanche Peak Units 1 and 2. Consideration of license renewal did not change the priority of the issue.
- Potential for Unacceptable Interaction Between the CRD System and Non-Essential Control Air System

  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the backfit that was made to address the safety concern, prior to prioritization. Consideration of license renewal did not change the priority of the issue.
- Detached Thermal Sleeves
  License renewal was not considered in the prioritization of this issue which was placed in the NEARLY-RESOLVED category and then resolved with backfits to the affected Westinghouse plants. Consideration of license renewal did not affect this resolution.
- 76 Instrumentation and Control Power Interactions
  License renewal was considered in the prioritization of this issue which was placed in the DROP category.
- Monitoring of Fatigue Transient Limits for Reactor Coolant System License renewal was not considered in the MEDIUM priority ranking of this index. This issue will provide technical information to the overall resolution of the safety concern under Issue 166, for which NRR has the lead responsibility. Resolution of Issue 166 will consider license renewal.

- Unanalyzed Reactor Vessel Thermal Stress During Natural Convection Cooldown
  License renewal was not considered in the MEDIUM priority ranking of this issue which was resolved with no backfit. Consideration of license renewal did not affect this resolution.
- Impact of Locked Doors and Barriers on Plant and Personnel Safety License renewal was considered in the prioritization of this issue which was given a LOW priority ranking.
- Failure of HPCI Steam Line Without Isolation
  License renewal was not considered in the HIGH priority ranking of
  this issue which was resolved with backfit. Consideration of
  license renewal did not affect this resolution.
- Stiff Pipe Clamps
  License renewal was not considered in the LOW priority ranking of this issue for operating plants based on the potential risk reduction (2,500 man-rem) and the high cost of resolution (\$95.5M).
  Consideration of license renewal did not change the priority of the issue.
- Once-Through Steam Generator Level
  License renewal was considered in the prioritization of this issue which was placed in the DROP category.
- Interfacing Systems LOCA at LWRs
  License renewal was not considered in the HIGH priority ranking of
  this issue but was considered in the resolution which resulted in no
  backfit. Consideration of license renewal did not affect this
  resolution.
- Equipment Protective Devices on Engineered Safety Features
  License renewal was not considered in the prioritization of this
  issue which was placed in the DROP category based on the potential
  risk reduction (negligible). Consideration of license renewal did
  not change the priority of the issue.
- Dynamic Qualification Testing of Large Bore Hydraulic Snubbers
  License renewal was not considered in the HIGH priority ranking of
  this issue which was resolved with no backfit. Consideration of
  license renewal did not affect this resolution.
- Tendon Anchorage Failure
  License renewal was not considered in the prioritization of this issue which was placed in the RESOLVED category based on the voluntary actions taken by licensees to address the safety concern. Consideration of license renewal did not change the priority of the issue.

- On-Line Testability of Protection Systems
  License renewal was not considered in the MEDIUM priority ranking of this issue which was resolved with no backfit. Consideration of license renewal did not affect this resolution.
- Hydrogen Control for Large, Dry PWR Containments
  License renewal was not considered in HIGH priority ranking of this
  issue which was resolved with no backfit. Consideration of license
  renewal did not affect this resolution.
- Deficiencies in the Regulations Governing DBA and Single-Failure Criteria Suggested by the Davis-Besse Event of June 9, 1985
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concerns either had been or were being addressed in other GSIs or NRC programs. Consideration of license renewal did not change the priority of the issue.
- Electrical Power Reliability
  License renewal was not considered in the HIGH priority ranking of
  this issue which was resolved with backfit. Consideration of
  license renewal did not affect this resolution.
- Essential Service Water Pump Failures at Multiplant Sites
  License renewal was not considered in the HIGH priority ranking of
  this issue which was resolved with backfit. Consideration of
  license renewal did not affect this resolution.
- RHR System Inside Containment
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the conclusion that the potential reduction in core damage frequency was not substantial enough to meet the Backfit Rule (10 CFR 50.109). Consideration of license renewal did not change the priority of the issue.
- Steam Generator and Steam Line Overfill
  License renewal was not considered in the MEDIUM priority ranking of
  this issue which was resolved with no backfit based on the low
  public risk associated with steam generator tube rupture and steam
  line overfill events. Consideration of license renewal did not
  affect this resolution.
- Deinerting of BWR MARK I and II Containments During Power Operations
  Upon Discovery of RCS Leakage or a Train of a Safety System
  Inoperable
  License renewal was considered in the LOW priority ranking of this issue.

- Leakage Through Electrical Isolators in Instrumentation Circuits
  License renewal was not considered in the MEDIUM priority ranking of
  this issue which was resolved with no backfit. Consideration of
  license renewal did not affect this resolution.
- Availability of Chilled Water Systems and Room Cooling
  License renewal was not considered in the HIGH priority ranking of
  this issue which was resolved with no backfit. Consideration of
  license renewal did not affect this resolution.
- Scram Without a Turbine/Generator Trip
  License renewal was not considered in the LOW priority ranking of
  this issue based on the potential risk reduction (52 man-rem).
  Consideration of license renewal did not change the priority of the
  issue.
- Actions to Reduce Common Cause Failures
  License renewal was considered in the prioritization of this issue which was placed in the NEARLY-RESOLVED category. In accordance with RES Office Letter No. 3, license renewal will have to be addressed again in the resolution of the issue.
- Support Flexibility of Equipment and Components
  License renewal was not considered in LOW priority ranking of this
  issue for operating plants based on the findings that the safety
  concern had been addressed in another GSI and an ongoing NRC
  program. Consideration of license renewal did not change the
  priority of the issue.
- Adequacy of Fire Barriers
  License renewal was not considered in the LOW priority ranking of this issue based on the potential risk reduction (500 man-rem).
  Consideration of license renewal did not change the priority of the issue.
- Overpressurization of Containment Penetrations
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the potential risk reduction (40 man-rem). Consideration of license renewal did not change the priority of the issue.
- Reliability of Anticipated Transient Without SCRAM Recirculation
  Pump Trip in BWRs
  License renewal was not considered in the MEDIUM priority ranking of
  this issue which was resolved with no backfit; a more detailed
  analysis showed very little risk reduction potential. Consideration
  of license renewal did not affect this resolution.

- Design Basis for Valves That Might Be Subjected to Significant Blowdown Loads
  License renewal was not considered in the LOW priority ranking of this issue based on the potential risk reduction (110 man-rem). Consideration of license renewal did not change the priority of the issue.
- Loss of Essential Service Water in LWRs
  License renewal was not considered in the HIGH priority ranking of
  this issue. However, license renewal was considered in the
  resolution of this issue which was resolved with no backfit.
- Adequacy of Emergency and Essential Lighting
  License renewal was not considered in the LOW priority ranking of
  this issue based in the potential risk reduction (1,854 man-rem) and
  the high cost of resolution (\$18.75M). Consideration of license
  renewal did not change the priority of the issue.
- More Realistic Source Term Assumptions
  This issue involves developing a new licensing basis source term to replace TID-14844. This new source term is being based on recent severe accident research findings. Accordingly, consideration of license renewal will not impact the resolution of this issue.
- Improve Design Requirements for Nuclear Facilities
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the findings that the safety concerns either had negligible risk reduction potential or were addressed or being addressed in other NRC programs. Consideration of license renewal did not change the priority of the issue.
- Improve Criticality Calculations
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.
- More Realistic Severe Reactor Accident Scenario
  License renewal was not considered in the prioritization of this
  issue which was placed in the DROP category based on the finding
  that the safety concern was being addressed by an ongoing NRC
  program. Consideration of license renewal did not change the
  priority of the issue.
- Improve Decontamination Regulations
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.

- Improve Decommissioning Regulations
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.
- Settlement of Foundations and Buried Equipment
  License renewal was not considered in the prioritization of this
  issue which was placed in the DROP category based on the finding
  that the safety concern was being addressed in an ongoing NRC
  program. Consideration of license renewal did not change the
  priority of the issue.
- Dam Integrity and Site Flooding
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.
- Site Hydrology and Ability to Withstand Floods
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.
- Industrial Hazards
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.
- 156.1.5 Tornado Missiles
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.
- License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern had been previously addressed in Issue A-37 (evaluated in NUREG/CR-5382). Consideration of license renewal did not change the priority of the issue.

- Severe Weather Effects on Structures
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.
- Design Codes, Criteria, and Load Combinations
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.
- Containment Design and Inspection
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was addressed in Issue 118 (evaluated above). Consideration of license renewal did not change the priority of the issue.
- Seismic Design of Structures, Systems, and Components
  License renewal was not considered in the prioritization of this
  issue which was placed in the DROP category based on the finding
  that the safety concern was being addressed in an ongoing NRC
  program. Consideration of license renewal did not change the
  priority of the issue.
- 156.3.1.1 Shutdown Systems
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.
- Electrical Instrumentation and Controls
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.
- Service and Cooling Water Systems
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was addressed in Issues 51 (evaluated in NUREG/CR-5382), and 130, 143, and 153 (evaluated above). Consideration of license renewal did not change the priority of the issue.

- Ventilation Systems
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was addressed in Issues 136 (evaluated in NUREG/CR-5382), 143 (evaluated above), and 83 and 106 (currently being resolved). Consideration of license renewal did not change the priority of the issue.
- Isolation of High and Low Pressure Systems
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was addressed in Issue 105 (evaluated above). Consideration of license renewal did not change the priority of the issue.
- Automatic ECCS Switchover
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was addressed in Issue 24 (evaluated above). Consideration of license renewal did not change the priority of the issue.
- Emergency AC Power
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was addressed in Issues 128 (evaluated above) and B-56 (evaluated below). Consideration of license renewal did not change the priority of the issue.
- Emergency DC Power
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was being addressed in an ongoing NRC program. Consideration of license renewal did not change the priority of the issue.
- Shared Systems
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was addressed in Issues 43 and A-44 (evaluated in NUREG/CR-5382) and 130 (evaluated above). Consideration of license renewal did not change the priority of the issue.
- RPS and ESFS Isolation
  License renewal was not considered in the prioritization of this issue which was incorporated into the resolution of Issue 142 (evaluated above). Consideration of license renewal did not change the priority of the issue.

- Testing of the RPS and ESFS
  License renewal was not considered in the prioritization of this issue which was incorporated into the resolution of Issue 120 (evaluated above). Consideration of license renewal did not change the priority of the issue.
- Containment Performance
  License renewal was not considered in the prioritization of this issue which was placed in the RESOLVED category based on the finding that the safety concern was addressed in a completed NRC program. Consideration of license renewal did not change the priority of the issue.
- Performance of Power-Operated Valves Under Design Basis Conditions License renewal was not considered in the MEDIUM priority ranking of this issue but, in accordance with RES Office Letter No. 3, will be addressed during resolution.
- Qualification of Safety-Related Pumps While Running on Minimum Flow License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern had been addressed by Bulletin 88-04. Consideration of license renewal did not change the priority of the issue.
- Spurious Actions of Instrumentation Upon Restoration of Power License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the potential risk reduction (4,320 man-rem) and the high cost of resolution (\$46M). Consideration of license renewal will only move the issue to a LOW priority ranking.
- Use of Non-Safety-Related Power Supplies in Safety-Related Circuits
  License renewal was not considered in the prioritization of this
  issue which was placed in the DROP category based on the finding
  that the safety concern was one of compliance with existing
  regulations. Consideration of license renewal did not change the
  priority of the issue.
- Inadequate Technical Specifications for Shared Systems at Multiplant Sites When One Unit Is Shutdown
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was addressed in other NRC programs. Consideration of license renewal did not change the priority of the issue.

- Neutron Fluence in Reactor Vessel
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the finding that the safety concern was addressed in other NRC programs. Consideration of license renewal did not change the priority of the issue.
- Spring-Actuated Safety and Relief Valve Reliability
  License renewal was not considered in the HIGH priority ranking of
  this issue but, in accordance with RES Office Letter No. 3, will be
  addressed during resolution.
- Adequacy of Fatique Life of Metal Components
  License renewal was not considered in the prioritization of this issue which was placed in the NEARLY-RESOLVED category. NRR has the lead responsibility for resolving this issue and would be expected to follow the Statement of Consideration in the License Renewal Rule (56 FR 64943) in considering license renewal during resolution.
- E. ironmental Qualification of Electrical Equipment
  License renewal was not considered in the prioritization of this
  issue which was placed in the NEARLY-RESOLVED category. NRR has the
  lead responsibility for resolving this issue and would be expected
  to follow the Statement of Consideration in the License Renewal Rule
  (56 FR 64943) in considering license renewal during resolution.
- B-22 LWR Fuel
  License renewal was not considered in the prioritization of this issue which was placed in the DROP category based on the negligible risk reduction potential. Consideration of license renewal did not change the priority of the issue.
- B-56

  Diesel Reliability
  License renewal was not considered in the HIGH priority ranking of this issue which was resolved with the issuance of Regulatory Guide 1.9. Rev. 3 and incorporation of diesel generator maintenance by the Maintenance Rule. Consideration of license renewal did not affect this resolution.
- HF4.4 <u>Guidelines for Upgrading Other Procedures</u>
  License renewal was not considered in the HIGH priority ranking of this issue which was resolved with no backfit. Consideration of license renewal did not affect this resolution.
- HF5.1 Local Control Stations
  License renewal was not considered in the HIGH priority ranking of this issue which was resolved with no backfit. Consideration of license renewal did not affect this resolution.

- HF5.2 Review Criteria for Human Factors Aspects of Advanced Controls and Instrumentation
  License renewal was not considered in the HIGH priority ranking of this issue which was resolved with no backfit. Consideration of license renewal did not affect this resolution.
- I.D.3 Safety System Status Monitoring
  License renewal was not considered in the MEDIUM priority ranking of
  this issue which was resolved with no backfit. Consideration of
  license renewal did not affect this resolution.
- II.J.4.1 Revise Deficiency Reporting Requirements
  License renewal was not considered in the prioritization of this issue which was placed in the NEARLY-RESOLVED category and resolved with no backfit; procedure changes do not qualify as backfit. Consideration of license renewal did not affect this resolution.

# 21 GSIs RESOLVED BETWEEN OCTOBER 1990 AND MARCH 1994 (SEE TITLES IN ENCLOSURE 1)