

TENNESSEE VALLEY AUTHORITY

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MAR 23 1988

U.S. Nuclear Regulatory Commission
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Gentlemen:

NUCLEAR REGULATORY COMMISSION (NRC) - PROPOSED POLICY STATEMENT - INTEGRATED SCHEDULE FOR IMPLEMENTATION OF PLANT MODIFICATIONS

The Tennessee Valley Authority (TVA) has reviewed and is pleased to provide comments on the proposed policy statement noticed in the November 27, 1987 Federal Register notice (52 FR 45344-45346) regarding integrated schedules for implementation of plant modifications.

We support the position that the implementation of integrated schedules on a plant-specific and voluntary basis can provide a stable environment with regard to resources to be expended for coordinating, managing, and scheduling major modifications both regulatory and licensee originated.

In addition, we offer the following response to the four questions posed by NRC in the Federal Register notice.

1. Question - Comment on the value of integrated schedules as a planning tool for utilities.

Response - If properly developed, the integrated schedule approach can be used to support many management goals in interfacing with the NRC staff. In order for these goals to be properly met, the proposed plan for an integrated schedule process should consider plant betterment modifications as well as regulatory-related modifications.

Only with a proper mix of these various types of plant modifications can a meaningful integrated schedule be developed. Licensee-initiated plant changes should only be required to appear on the integrated schedule as deemed appropriate by the licensee in presenting an overall understanding as to how they are being integrated with NRC initiatives. The licensee should be allowed to revise the schedule for licensee-initiated changes provided such changes do not impact the schedule for completing NRC-based initiatives.

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This will necessitate the establishment of a proper priority scheme for all changes and must be tied into the plan description.

As noted in the proposed policy statement "prioritization criteria" should be established within the submitted plan description which allows flexibility in plant-specific schedules. TVA would propose the following types of prioritization criteria many of which generally coincide with the prioritization methodology proposed by the Commission.

- a. Safety improvement factors are items that sometimes are overlapped by plant improvements or modifications mandated by NRC. However, many items are not covered by regulatory-related concerns. Factors that may be considered should include improvements from plant-specific probabilistic risk assessment-type studies or the related individual plant evaluations that NRC is planning to request of utilities as part of the resolution of severe accident issues. Various criteria can be applied from such plant accident studies.
- b. Technical specification requirements/improvements are of considerable importance in the overall prioritization scheme because other areas of plant operation can be potentially affected (e.g., procedures, testing, and surveillances).
- c. The occupational radiation exposure associated with a modification is considered in terms of its conformance to as low as reasonably achievable goals and guidelines.
- d. Personnel safety (nonradiological) is considered in regard to the modification's support in maintaining or improving occupational safety through compliance with the Occupational Safety and Health Administration regulations or other plant safety rules and regulations.
- e. Ease of plant operation is a measure of the benefit provided by the modification in support of maintaining or improving the ease and efficiency of plant operations by plant operating personnel.
- f. Plant availability/reliability is a characteristic considered in determining the benefit to be derived from the modification in regard to maintaining or improving plant availability, reliability, and efficiency.
- g. Maintenance requirements resulting from a modification are considered as to whether they result in an increase or decrease in frequency or scope of maintenance.

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Overall, TVA supports the concept of development of prioritization criteria. The selection of this methodology should be decided upon by each licensee consistent with generally accepted planning and scheduling practices used throughout the nuclear industry.

The licensee's prioritization method must allow for a subjective evaluation based on experience and must be supplemented by management's decision. The determination of completion dates is based, in part, on management's established manpower and financial limits, outage start dates, and outage lengths. Plant experience and management prerogative can influence the priority of a modification, and such factors may include cost-benefit considerations, the regulatory agencies involved (NRC, ASME, OSHA, etc.), and the procurement leadtime. After the priorities and other factors have been taken into consideration, the licensee determines the completion dates for the modifications.

Using decision analysis techniques, a list of prioritized changes can be generated. Applying this list by a computer-based scheduling tool can produce an integrated schedule for completing modifications based on needed and available resources and a realistic schedule for performing these activities. There are, however, various pitfalls that utilities must avoid when developing such realistic schedules. Some of these pitfalls are listed below and should be strongly considered by the NRC staff when considering submitted plans.

- ° Realistic Task Schedules/Cost Estimates - These are key considerations in any scheduling activity. Unrealistic optimism concerning cost or schedule requirements should not be tolerated in integrated schedules developed for this NRC policy statement.
- ° Additional Changes - Unanticipated modification requirements will arise during any long duration schedule period. Extra resources may need to be reserved for these unexpected changes. The NRC staff and utilities should reach a firm understanding that a proper mix of responses to these changes may also require expanding the schedule to accommodate additions in scope.
- ° Support Resources - Underestimation of the support resources needed to perform planned modifications is a prime reason for the failures of such schedules. Specific support functions that should be accommodated within the NRC-approved plan include the availability of spare parts, completion of required documentation, provisions for required area access control, consideration of space planning so that one change does not interfere with another, and provisions for monitoring techniques/resources to effectively manage and control schedule performance.

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2. Question - Comment on the advantages and disadvantages of a negotiated commitment on scheduling of the implementation of regulatory requirements.

Response - Because TVA supports the approach proposed to make integrated schedules a negotiated commitment, the advantages are clear. Both TVA and NRC resources will be optimized in establishing regulatory-related plant schedules. Public perception of the relationship between nuclear utility and NRC management should also be enhanced by such plans. TVA considers such perceptions of public safety to be strongly tied to the public's understanding of these relationships. NRC's management of safety-related plant modifications and the utility's related commitments by the integrated schedule technique should assist in forming a sound basis for positive public perception.

It is important, however, that the NRC staff fully agrees that the proposed schedules are based upon a submitted plan that implements many plant-specific priority criteria.

In addition, TVA notes that the NRC regional staff review requirements are not addressed in the proposed policy statement. This review should be limited to confirming that the program plan is being carried out as approved by the appropriate NRC project.

The framework for revisions to the integrated schedule should be described in the utility plan. This framework should allow utility flexibility in changes, and it should be structured so that the inclusion of the licensee's plant betterment projects will be viewed appropriately by the NRC staff. Both regulatory and utility interests must be served in a proper balance.

3. Question - Comment on the value of having the schedule become a license amendment.

Response - If the integrated schedule becomes a license amendment, there are advantages and disadvantages; TVA offers an alternative to the license amendment approach. A schedule that has been negotiated with the NRC staff and committed to in writing by the utility offers a more flexible approach than issuance of a license amendment. If the schedule is carefully worded by referring to milestones (e.g., refueling cycles) instead of fixed dates, then there should be few cases of schedule exemption being required. Also, this approach offers the opportunity to easily revise the schedule for unforeseen events without the burdens of the license amendment process. In addition, TVA believes that a negotiated schedule between the utility and NRC confirms an agreement showing good faith on the part of both the NRC staff and the licensee in implementing significant plant modifications.

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In addition, TVA offers the following comments on the handling of schedule revision to either a negotiated schedule or a license amendment. NRC should establish clear criteria within the final policy statement that delineates the circumstances under which the Commission can impose changes involving accelerated implementation dates. These criteria should clearly note that such changes may delay implementation of other regulatory requirements or other licensee-initiated projects. TVA agrees with this policy, provided the NRC staff's criteria for mandating such changes are clearly defined and are found to be consistent with plant needs relative to the prioritization criteria.

Licensee-initiated changes to the integrated schedule should be allowed for "good cause" as defined within the submitted program plan approved by the NRC staff. Unforeseen plant outages should not be described within the negotiated plan as a licensee consideration to be given.

4. Question - Comment on additional options for implementation of integrated schedules.

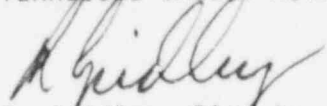
Response - See TVA response to question 3.

In conclusion, we want to direct your attention to what is believed to be the most pressing concern at this time: resolution over the issue of the three categories proposed as methods of establishing integrated schedules. The implication in the draft policy statement is that those licensees who do not elect category 1 (plants with an integrated license amendment) will not have the flexibility to revise their schedules even for delays and impositions beyond their control. Participation in the integrated scheduling program must be voluntary, and the licensee must be given the flexibility to develop and maintain realistic, achievable schedules. Utilities must know they have the final decision in determining all factors regarding plant modifications, including schedules for implementation. We are therefore suggesting more information on this issue before continuing into the details of implementation.

We appreciate the opportunity for comment.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


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cc: See page 6

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