



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

August 7, 1998

MEMORANDUM TO: Thomas H. Essig, Acting Chief
Generic Issues and Environmental Projects Branch
Division of Reactor Program Management
Office Of Nuclear Reactor Regulation

FROM: Eileen M. McKenna, Senior Reactor Engineer *Eileen McKenna*
Generic Issues and Environmental Projects Branch
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 6, 1998, MEETING WITH THE REGULATORY
COMPLIANCE AND TECHNOLOGY GROUP (RCTG)

On August 6, 1998, members of the NRC staff made a presentation at a meeting of the RCTG in Bethesda, Maryland. The staff presentation, which was open for public observation, was part of a workshop sponsored by the RCTG that had a number of industry participants. Attachment 1 provides a list of NRC attendees.

The purpose of the staff's presentation was to discuss topics of mutual interest relating to regulatory processes such as proposed rulemaking on 10 CFR 50.59 and commitment management. Attachment 2 provides the slides used by the NRC staff members during their presentation.

Attachments: As stated

cc: See next page

1/1
Df03

L-4-1P TSO-59
X O + M - 6 Meet Gra.

98-159
NRC FILE CENTER COPY

9808120119 980807
PDR ORG NRRA
PDR

org - 114

August 7, 1998

MEMORANDUM TO: Thomas H. Essig, Acting Chief
Generic Issues and Environmental Projects Branch
Division of Reactor Program Management
Office Of Nuclear Reactor Regulation

FROM: Eileen M. McKenna, Senior Reactor Engineer Original Signed By:
Generic Issues and Environmental Projects Branch
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 6, 1998, MEETING WITH THE REGULATORY
COMPLIANCE AND TECHNOLOGY GROUP (RCTG)

On August 6, 1998, members of the NRC staff made a presentation at a meeting of the FCTG in Bethesda, Maryland. The staff presentation, which was open for public observation, was part of a workshop sponsored by the RCTG that had a number of industry participants. Attachment 1 provides a list of NRC attendees.

The purpose of the staff's presentation was to discuss topics of mutual interest relating to regulatory processes such as proposed rulemaking on 10 CFR 50.59 and commitment management. Attachment 2 provides the slides used by the NRC staff members during their presentation.

Attachments: As stated

cc: See next page

DISTRIBUTION: See attached list

DOCUMENT NAME: G:\EMM\MSUM0806.98

OFC	DRPM:PGEB	DRPM:PGEB	DRPM:PGEB
NAME	EMcKenna:ayw	FAkstulewicz	TEssig
DATE	8/7/98	8/17/98	8/17/98

OFFICIAL RECORD COPY

Distribution: Mtg. Summary w/RCTG Dated August 7, 1998

Hard Copy

✓ Central Files

PUBLIC

PGEB R/F

OGC

ACRS

EMcKenna

EMail

SCollins/FMiraglia

BSheron

BBoger

RZimmerman

JRoe

DMatthews

TEssig

FAkstulewicz

GTracy, EDO

ATTENDEES AT RCTG WORKSHOP

August 6, 1998

NAME

ORGANIZATION

David Matthews

NRC/Office of Nuclear Reactor Regulation (NRR)

Roy Zimmerman

NRC/NRR

Steve Breslauer

Regulatory Compliance and Technology Group

NOTE: NRC did not tabulate names of other attendees at this workshop due to limited NRC participation.

Attachment 1



CURRENT NRC REGULATORY PROCESS INITIATIVES

August 6, 1998

David B. Matthews

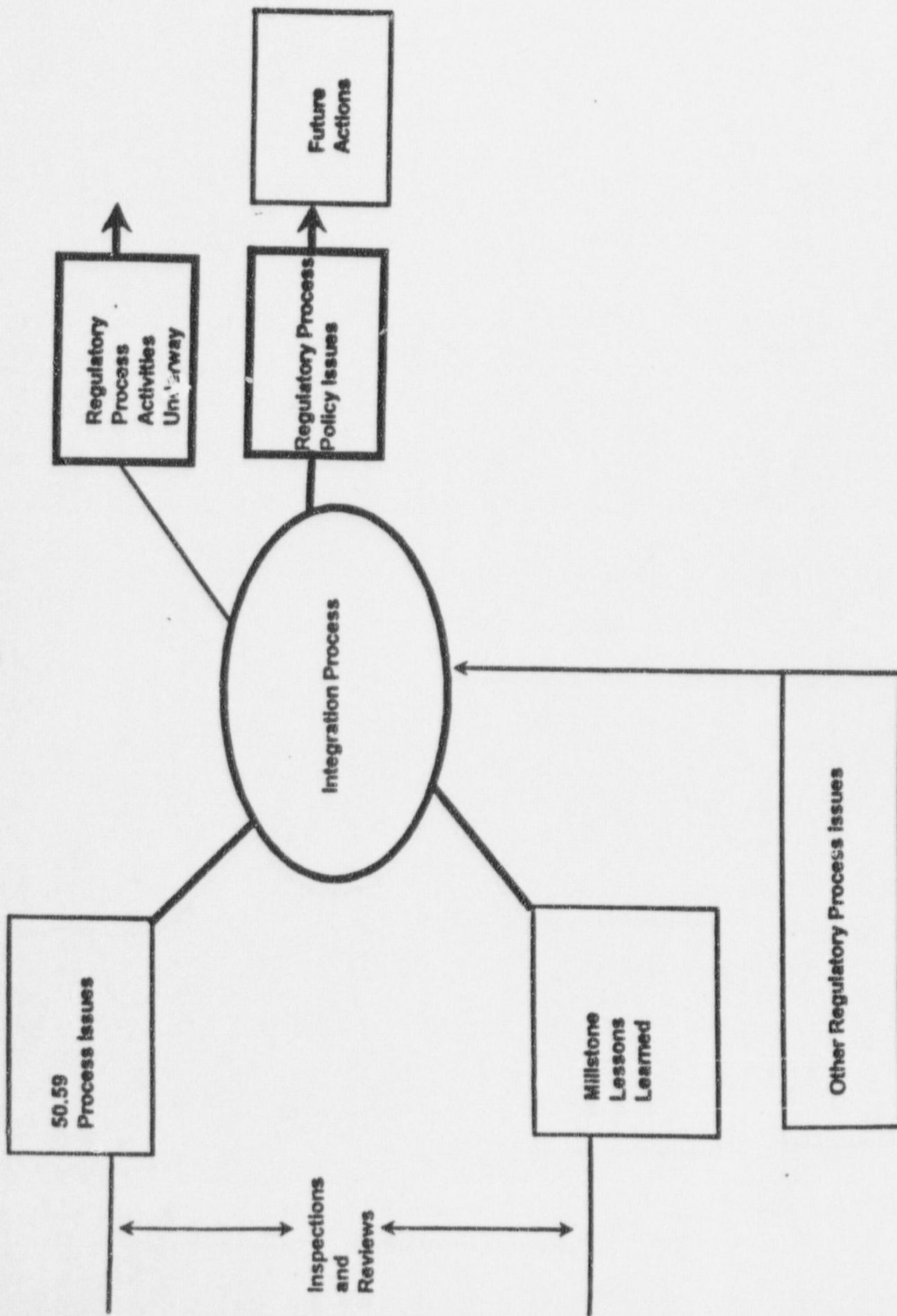
Office of Nuclear Reactor Regulation

RCTG Workshop

OUTLINE

- **Background**
- **Updated FSAR**
 - staff recommended course of action
 - Commission response
- **10 CFR 50.59**
 - Rulemaking
 - enforcement discretion
- **Other issues and Next Steps**

Integration



UFSAR REGULATORY GUIDANCE AREAS

- Scope of issues to be addressed in 10 CFR 50.71 (e) updates
- Level of Detail of updated pages
- Format of FSAR updates
- Removal of Information not associated with a change to the plant
- Treatment of plant drawings
- Historical information

REGULATORY GUIDANCE AREAS (cont'd)

- Frequency of periodic update submittal for multi-unit sites with common FSAR
- Treatment of temporary modifications in FSAR updates
- Treatment of nonconforming conditions between facility and updated FSAR
- Treatment of FSAR information related to removal or retirement-in-place of SSCs

COMMISSION RESPONSE ON FSAR

- Strive to endorse NEI 98-03; if not resolved by December 1998, issue draft generic letter for comment
- Exercise enforcement discretion for complete and accurate FSAR until:
 - for risk-significant items, 6 months after issuance of guidance endorsement (or generic letter).
 - for other items, 18 months after

50.59 DISCUSSION

- Commission SRM on SECY-97-205 directed staff to:
 - (1) Prepare a proposed rulemaking package for revision to 10 CFR 50.59 by July 10, 1998 that will allow minimal increases in (a) probability, (b) consequences and (c) minimal reductions in margin to be made without prior NRC approval;
 - (2) Define "minimal" in a clear and practical manner;
 - (3) Continue interactions with NEI to reconcile areas of disagreement on NEI 96-07;
 - (4) Evaluate certain other changes to the rule;
 - (5) Consider parallel changes to other regulations
(e.g., Part 72) with similar provisions.

STAFF RESPONSE TO SRM

- **Changes included in proposed rule package**
 - minimal increases in probability and consequences
 - definition of reduction in margin of safety
 - malfunction with a different result
 - changes to Part 72
- **Issues not included as noted in May 27 memo**
 - accident of different type with minimal safety impact
 - acceptance limits for consequences
 - minimal reductions in margin of safety

10 CFR 50.59 ENFORCEMENT DISCRETION

- March 24, 1998 SRM directs staff to exercise discretion during period prior to rule change for issues clearly not of safety significance or regulatory significance
- Staff is using existing policy and 50.59 panel (EGM 97-019) to exercise discretion to reduce severity levels for instances of low safety and regulatory significance.
- Commission requested specifics on nature and types of situations for which discretion will be considered.
- Staff developed factors to examine in deciding on discretion based upon existing policies and experience.

OTHER ISSUES

- **Design Basis**
 - Staff review of NEI 97-04
 - ANPR published July 24 on reporting requirements
- **Upcoming Workshops (8/21 on reporting; 9/1 on industry standards and initiatives)**

NEXT STEPS

- **Commission response to 10 CFR 50.59 rulemaking**
- **Staff review of NEI 98-03**
- **Continue interactions with NEI on other industry guidance documents**



REGULATORY COMPLIANCE
AND
TECHNOLOGY GROUP WORKSHOP

ROY P. ZIMMERMAN
OFFICE OF NUCLEAR REACTOR REGULATION
U.S. NUCLEAR REGULATORY COMMISSION

AUGUST 6, 1998

STATUS OF NRC INITIATIVES IN
AREAS OF NRC STAKEHOLDER CONCERN

*** RISK-INFORMED & PERFORMANCE BASED
REGULATION**

CONCERNS

- ACCELERATE EFFORTS
- RESOURCES EXPENDED ON
REGULATIONS OF NO OR LOW SAFETY
SIGNIFICANCE
- DIMINISH RIGID INSISTENCE ON STRICT
COMPLIANCE

NRC ACTIONS

- COST BENEFICIAL LICENSING ACTIONS (OVER
235 APPROVED; EST. SAVINGS \$1.25B)

- TECH SPEC IMPROVEMENT PLAN (20 SITES/ 32 PLANTS ISSUED; TOTAL 92 PLANTS CURRENTLY PLANNED)

- PRA IMPLEMENTATION PLAN (OVER 100 INITIATIVES)

-- REGULATORY GUIDE 1.174, SRP CHAP 19 (GENERIC GUIDANCE)

-- DRAFT RG/SRP: T/S, ISI, IST, GRADED QA

-- NEI PILOTS APPLICATIONS

-- SENIOR REACTOR ANALYSTS

-- TRAINING

-- MGMT OVERSIGHT STEERING COMMITTEE

- PERFORMANCE BASED REGULATION (APPENDIX J, MAINTENANCE RULE)

- PETITIONS FOR RULEMAKING

- CONTINUE WORKSHOPS

*** INSPECTION & ENFORCEMENT**

CONCERNS

- LEVEL OF INSPECTION SHOULD MATCH
SAFETY PERFORMANCE

- NRC FOCUS ON PAPER COMPLIANCE

- INCREASED NUMBER OF VIOLATIONS WHILE
SAFETY HAS IMPROVED

- COST OF RESPONDING TO LOW LEVEL
VIOLATIONS

NRC ACTIONS

- (BCKGRD) INCREASED VIOLATIONS DUE TO
FOCUS ON 1) FSAR LICENSING BASIS, & 2)
COMPLIANCE & CONSISTENCY

- REDUCED AVG INSPECTION HOURS (3100 IN

1990 / 2500 IN 1997)

- APPEAL PROCESS FOR LO LEVEL VIOLATIONS

- SPECIAL ENFORCEMENT PANELS (50.59 & MAINTENANCE RULE ISSUES)

- STAFF GUIDANCE RECENTLY ISSUED (LOW LEVEL VIOLATIONS):

- DON'T "MINE" FOR LICENSEE-IDENTIFIED VIOLATIONS

- MULTIPLE EXAMPLES OF SAME VIOLATION (SINGLE CITATION)

- VIOs W/CORRECTIVE ACTION ALREADY ON DOCKET (LERs)- NO RESPONSE NEEDED

- INSPECTION PROGRAM REVIEW PLANNED

- PUBLIC ENFORCEMENT WORKSHOPS

- DEVELOP FURTHER RISK-INFORMED ENFORCEMENT GUIDANCE

*** PERFORMANCE ASSESSMENT**

CONCERNS

- SALP & SMM ARE TOO SUBJECTIVE
- SHOULD BE OBJECTIVE, PREDICTABLE & REPEATABLE
- RESOURCE INTENSIVE

NRC ACTIONS

- INCREASED USE OF QUANTITATIVE DATA
- STRUCTURED USE OF PERFORMANCE INFO (PIM; PUBLIC AVAILABILITY)
- INCREASED PARTICIPATION AT SMMs
- SMM FREQUENCY CHANGED TO ANNUAL
- GOAL: DEVELOP SINGLE-INTEGRATED, OBJECTIVE, SCRUTABLE PROCESS; LESS

RESOURCES

- CONTINUE DIALOGUE WITH STAKEHOLDERS
(REVIEW NEIs PROPOSAL)

*** LICENSING & OVERSIGHT**

CONCERNS

- INFORMAL PROCESSES CAN IMPOSE
REQUIREMENTS

- * GENERIC COMMUNICATIONS

- * CONFIRMATORY ACTION LETTERS

- * MANAGEMENT PERSONNEL SELECTIONS

- DESIGN BASIS INFORMATION

- * NRC's REVIEW BURDENSOME FOR SAFETY
BENEFIT

- * BETTER DEFINE TERMS & REQUIREMENTS

NRC ACTIONS

- PROPOSED GLs & BULLETINS REVIEWED
EARLY BY NRC MGMT (REQUESTED ACTIONS
COMMENSURATE WITH SAFETY)

- TYPICALLY PUBLISHED FOR PUBLIC COMMENT

- CALs: INCREASE MGMT OVERSIGHT;
EMPHASIZE PROPER USE & WORDING

- CONCERNS WITH NRC INVOLVEMENT IN
LICENSEE PERSONNEL SELECTIONS ARE
REQUESTED TO BE PROVIDED TO THE
AGENCY

- CONTINUE DIALOGUES ON PROCESSES

- DESIGN INSPECTIONS IDENTIFIED SOME
OPERABILITY ISSUES (IN 98- 22)

- DEVELOP 10CFR50.59 RULEMAKING TO
INCREASE SPECIFICITY & FLEXIBILITY

***ORGANIZATION & BUDGET**

CONCERNS

- NRC STAFFING SHOULD BE SHARPLY REDUCED

- INVOLVEMENT IN INTERNATIONAL ACTIVITIES EXCESSIVE

NRC ACTIONS

- NRC FY98 BUDGET (INFLATION ADJUSTED) IS LOWEST IN 23 YEAR AGENCY HISTORY

- NRC RESEARCH BUDGET REDUCED APPROX 80% OVER PAST 17 YEARS

- SINCE FY94 NRC SENIOR MGMT REDUCED 16%

- INTERNATIONAL COOPERATION PROVIDES USEFUL, APPLICABLE INFORMATION

- IMPROVED PLANNING & BUDGETING PROCESS
 - DETAILED PLANNING ASSUMPTIONS
 - BUDGET SPREADSHEET CREATED TO DEFINE LABOR RATES
 - QUARTERLY PROGRESS REVIEWS
 - REVIEWING PRIORITIZATION OF STAFF WORKLOAD (INCL SUNSETTING)
 - CONSULTANT ASSISTING IN IDENTIFYING EFFECTIVENESS & EFFICIENCY GAINS
 - INFORMATION TECHNOLOGY ROLE
- ADJUDICATION
- URANIUM RECOVERY

COMMITMENT MANAGEMENT

RECENT ACTIVITIES

- PILOT PROGRAM CONDUCTED TO INCORPORATE COMMITMENTS RELIED UPON DURING STAFF REVIEW OF LICENSING ACTIONS INTO LICENSE CONDITIONS

- AUDITS OF COMMITMENT MANAGEMENT PROGRAMS AT 8 FACILITIES (FITZPATRICK, TMI, HATCH, SEQUOYAH, KEWAUNEE, PERRY, CALLAWAY, AND RIVER BEND) - (COMPLETED MAY 30, 1998)

- AUDIT FINDINGS

- LICENSEES IMPLEMENT
COMMITMENTS MADE TO STAFF

- DEFINITION OF "COMMITMENT"
VARIED (EX., ONE-TIME OR
ONGOING)

- VARYING DEGREES OF TRACEABILITY
& EVALUATION OF COMMITMENT
CHANGES

- AUDIT REPORTS HAVE BEEN ISSUED.

- STAFF PREPARING COMMISSION PAPER
TO REPORT THE AUDIT FINDINGS AND
RECOMMEND NEXT STEPS

August 7, 1998

MEMORANDUM TO: Thomas H. Essig, Acting Chief
Generic Issues and Environmental Projects Branch
Division of Reactor Program Management
Office Of Nuclear Reactor Regulation

FROM: Eileen M. McKenna, Senior Reactor Engineer Original Signed By:
Generic Issues and Environmental Projects Branch
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 6, 1998, MEETING WITH THE REGULATORY
COMPLIANCE AND TECHNOLOGY GROUP (RCTG)

On August 6, 1998, members of the NRC staff made a presentation at a meeting of the RCTG in Bethesda, Maryland. The staff presentation, which was open for public observation, was part of a workshop sponsored by the RCTG that had a number of industry participants. Attachment 1 provides a list of NRC attendees.

The purpose of the staff's presentation was to discuss topics of mutual interest relating to regulatory processes such as proposed rulemaking on 10 CFR 50.59 and commitment management. Attachment 2 provides the slides used by the NRC staff members during their presentation.

Attachments: As stated

cc: See next page

DISTRIBUTION: See attached list

DOCUMENT NAME: G:\EMM\MSUM0806.98

OFC	DRPM:PGEB	DRPM:PGEB	DRPM:PGEB
NAME	EMcKenna:ayw	FAkstulewicz	TEssig
DATE	8/7/98	8/17/98	8/17/98

OFFICIAL RECORD COPY



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

August 7, 1998

MEMORANDUM TO: Thomas H. Essig, Acting Chief

Generic Issues and Environmental Projects Branch
Division of Reactor Program Management
Office Of Nuclear Reactor Regulation

FROM:

Eileen M. McKenna, Senior Reactor Engineer *Eileen M. McKenna*
Generic Issues and Environmental Projects Branch
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

SUBJECT:

SUMMARY OF AUGUST 6, 1998, MEETING WITH THE REGULATORY
COMPLIANCE AND TECHNOLOGY GROUP (RCTG)

On August 6, 1998, members of the NRC staff made a presentation at a meeting of the RCTG in Bethesda, Maryland. The staff presentation, which was open for public observation, was part of a workshop sponsored by the RCTG that had a number of industry participants. Attachment 1 provides a list of NRC attendees.

The purpose of the staff's presentation was to discuss topics of mutual interest relating to regulatory processes such as proposed rulemaking on 10 CFR 50.59 and commitment management. Attachment 2 provides the slides used by the NRC staff members during their presentation.

Attachments: As stated

cc: See next page

Distribution: Mtg. Summary w/RCTG Dated August 7, 1998

Hard Copy

✓ Central Files

PUBLIC

PGEB R/F

OGC

ACRS

EMcKenna

EMail

SCollins/FMiraglia

BSheron

BBoger

RZimmerman

JRoe

DMatthews

TEssig

FAkstulewicz

GTracy, EDO

ATTENDEES AT RCTG WORKSHOP

August 6, 1998

<u>NAME</u>	<u>ORGANIZATION</u>
David Matthews	NRC/Office of Nuclear Reactor Regulation (NRR)
Roy Zimmerman	NRC/NRR
Steve Breslauer	Regulatory Compliance and Technology Group

NOTE: NRC did not tabulate names of other attendees at this workshop due to limited NRC participation.

Attachment 1



CURRENT NRC REGULATORY PROCESS INITIATIVES

August 6, 1998

David B. Matthews

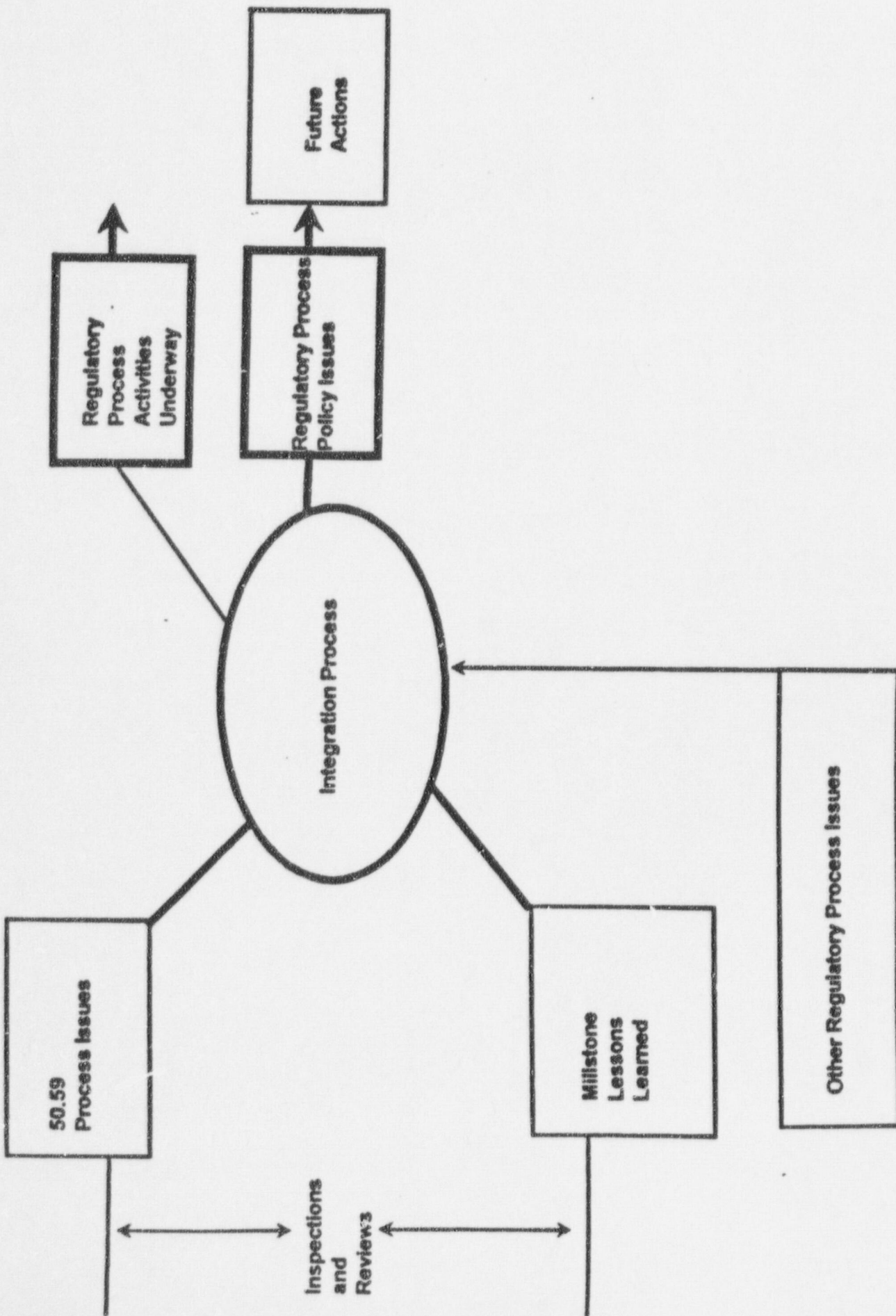
Office of Nuclear Reactor Regulation

RCTG Workshop

OUTLINE

- **Background**
- **Updated FSAR**
 - staff recommenced course of action
 - Commission response
- **10 CFR 50.59**
 - Rulemaking
 - enforcement discretion
- **Other issues and Next Steps**

Integration



UFSAR REGULATORY GUIDANCE AREAS

- **Scope of issues to be addressed in 10 CFR 50.71 (e) updates**
- **Level of Detail of updated pages**
- **Format of FSAR updates**
- **Removal of Information not associated with a change to the plant**
- **Treatment of plant drawings**
- **Historical information**

REGULATORY GUIDANCE AREAS (cont'd)

- Frequency of periodic update submittal for multi-unit sites with common FSAR
- Treatment of temporary modifications in FSAR updates
- Treatment of nonconforming conditions between facility and updated FSAR
- Treatment of FSAR information related to removal or retirement-in-place of SSCs

COMMISSION RESPONSE ON FSAR

- Strive to endorse NEI 98-03; if not resolved by December 1998, issue draft generic letter for comment
- Exercise enforcement discretion for complete and accurate FSAR until:
 - for risk-significant items, 6 months after issuance of guidance endorsement (or generic letter).
 - for other items, 18 months after

50.59 DISCUSSION

- Commission SRM on SECY-97-205 directed staff to:
 - (1) Prepare a proposed rulemaking package for revision to 10 CFR 50.59 by July 10, 1998 that will allow minimal increases in (a) probability, (b) consequences and (c) minimal reductions in margin to be made without prior NRC approval;
 - (2) Define "minimal" in a clear and practical manner;
 - (3) Continue interactions with NEI to reconcile areas of disagreement on NEI 96-07;
 - (4) Evaluate certain other changes to the rule;
 - (5) Consider parallel changes to other regulations (e.g., Part 72) with similar provisions.

STAFF RESPONSE TO SRM

- **Changes included in proposed rule package**
 - minimal increases in probability and consequences
 - definition of reduction in margin of safety
 - malfunction with a different result
 - changes to Part 72
- **Issues not included as noted in May 27 memo**
 - accident of different type with minimal safety impact
 - acceptance limits for consequences
 - minimal reductions in margin of safety

10 CFR 50.59 ENFORCEMENT DISCRETION

- March 24, 1998 SRM directs staff to exercise discretion during period prior to rule change for issues clearly not of safety significance or regulatory significance
- Staff is using existing policy and 50.59 panel (EGM 97-019) to exercise discretion to reduce severity levels for instances of low safety and regulatory significance.
- Commission requested specifics on nature and types of situations for which discretion will be considered.
- Staff developed factors to examine in deciding on discretion based upon existing policies and experience.

OTHER ISSUES

- **Design Basis**
 - Staff review of NEI 97-04
 - ANPR published July 24 on reporting requirements
- **Upcoming Workshops (8/21 on reporting; 9/1 on industry standards and initiatives)**

NEXT STEPS

- **Commission response to 10 CFR 50.59 rulemaking**
- **Staff review of NEI 98-03**
- **Continue interactions with NEI on other industry guidance documents**



**REGULATORY COMPLIANCE
AND
TECHNOLOGY GROUP WORKSHOP**

**ROY P. ZIMMERMAN
OFFICE OF NUCLEAR REACTOR REGULATION
U.S. NUCLEAR REGULATORY COMMISSION**

AUGUST 6, 1998

**STATUS OF NRC INITIATIVES IN
AREAS OF NRC STAKEHOLDER CONCERN**

*** RISK-INFORMED & PERFORMANCE BASED
REGULATION**

CONCERNS

- ACCELERATE EFFORTS

- RESOURCES EXPENDED ON
REGULATIONS OF NO OR LOW SAFETY
SIGNIFICANCE

- DIMINISH RIGID INSISTENCE ON STRICT
COMPLIANCE

NRC ACTIONS

- COST BENEFICIAL LICENSING ACTIONS (OVER
235 APPROVED; EST. SAVINGS \$1.25B)

- TECH SPEC IMPROVEMENT PLAN (20 SITES/ 32 PLANTS ISSUED; TOTAL 92 PLANTS CURRENTLY PLANNED)

- PRA IMPLEMENTATION PLAN (OVER 100 INITIATIVES)

-- REGULATORY GUIDE 1.174, SRP CHAP 19 (GENERIC GUIDANCE)

-- DRAFT RG/SRP: T/S, ISI, IST, GRADED QA

-- NEI PILOTS APPLICATIONS

-- SENIOR REACTOR ANALYSTS

-- TRAINING

-- MGMT OVERSIGHT STEERING COMMITTEE

- PERFORMANCE BASED REGULATION (APPENDIX J, MAINTENANCE RULE)

- PETITIONS FOR RULEMAKING

- CONTINUE WORKSHOPS

*** INSPECTION & ENFORCEMENT**

CONCERNS

- LEVEL OF INSPECTION SHOULD MATCH
SAFETY PERFORMANCE

- NRC FOCUS ON PAPER COMPLIANCE

- INCREASED NUMBER OF VIOLATIONS WHILE
SAFETY HAS IMPROVED

- COST OF RESPONDING TO LOW LEVEL
VIOLATIONS

NRC ACTIONS

- (BCKGRD) INCREASED VIOLATIONS DUE TO
FOCUS ON 1) FSAR LICENSING BASIS, & 2)
COMPLIANCE & CONSISTENCY

- REDUCED AVG INSPECTION HOURS (3100 IN

1990 / 2500 IN 1997)

- APPEAL PROCESS FOR LO LEVEL VIOLATIONS

- SPECIAL ENFORCEMENT PANELS (50.59 & MAINTENANCE RULE ISSUES)

- STAFF GUIDANCE RECENTLY ISSUED (LOW LEVEL VIOLATIONS):

- DON'T "MINE" FOR LICENSEE-IDENTIFIED VIOLATIONS

- MULTIPLE EXAMPLES OF SAME VIOLATION (SINGLE CITATION)

- VIOs W/CORRECTIVE ACTION ALREADY ON DOCKET (LERs)- NO RESPONSE NEEDED

- INSPECTION PROGRAM REVIEW PLANNED

- PUBLIC ENFORCEMENT WORKSHOPS

- DEVELOP FURTHER RISK-INFORMED ENFORCEMENT GUIDANCE

*** PERFORMANCE ASSESSMENT**

CONCERNS

- SALP & SMM ARE TOO SUBJECTIVE
- SHOULD BE OBJECTIVE, PREDICTABLE & REPEATABLE
- RESOURCE INTENSIVE

NRC ACTIONS

- INCREASED USE OF QUANTITATIVE DATA
- STRUCTURED USE OF PERFORMANCE INFO (PIM; PUBLIC AVAILABILITY)
- INCREASED PARTICIPATION AT SMMs
- SMM FREQUENCY CHANGED TO ANNUAL
- GOAL: DEVELOP SINGLE-INTEGRATED, OBJECTIVE, SCRUTABLE PROCESS; LESS

RESOURCES

- CONTINUE DIALOGUE WITH STAKEHOLDERS
(REVIEW NEIs PROPOSAL)

*** LICENSING & OVERSIGHT**

CONCERNS

- INFORMAL PROCESSES CAN IMPOSE
REQUIREMENTS

- * GENERIC COMMUNICATIONS

- * CONFIRMATORY ACTION LETTERS

- * MANAGEMENT PERSONNEL SELECTIONS

- DESIGN BASIS INFORMATION

- * NRC's REVIEW BURDENSOME FOR SAFETY
BENEFIT

- * BETTER DEFINE TERMS & REQUIREMENTS

NRC ACTIONS

- PROPOSED GLs & BULLETINS REVIEWED
EARLY BY NRC MGMT (REQUESTED ACTIONS
COMMENSURATE WITH SAFETY)

- TYPICALLY PUBLISHED FOR PUBLIC COMMENT

- CALs: INCREASE MGMT OVERSIGHT;
EMPHASIZE PROPER USE & WORDING

- CONCERNS WITH NRC INVOLVEMENT IN
LICENSEE PERSONNEL SELECTIONS ARE
REQUESTED TO BE PROVIDED TO THE
AGENCY

- CONTINUE DIALOGUES ON PROCESSES

- DESIGN INSPECTIONS IDENTIFIED SOME
OPERABILITY ISSUES (IN 98- 22)

- DEVELOP 10CFR50.59 RULEMAKING TO
INCREASE SPECIFICITY & FLEXIBILITY

***ORGANIZATION & BUDGET**

CONCERNS

- NRC STAFFING SHOULD BE SHARPLY REDUCED

- INVOLVEMENT IN INTERNATIONAL ACTIVITIES EXCESSIVE

NRC ACTIONS

- NRC FY98 BUDGET (INFLATION ADJUSTED) IS LOWEST IN 23 YEAR AGENCY HISTORY

- NRC RESEARCH BUDGET REDUCED APPROX 80% OVER PAST 17 YEARS

- SINCE FY94 NRC SENIOR MGMT REDUCED 16%

- INTERNATIONAL COOPERATION PROVIDES USEFUL, APPLICABLE INFORMATION

- IMPROVED PLANNING & BUDGETING PROCESS
 - DETAILED PLANNING ASSUMPTIONS
 - BUDGET SPREADSHEET CREATED TO DEFINE LABOR RATES
 - QUARTERLY PROGRESS REVIEWS
 - REVIEWING PRIORITIZATION OF STAFF WORKLOAD (INCL SUNSETTING)
 - CONSULTANT ASSISTING IN IDENTIFYING EFFECTIVENESS & EFFICIENCY GAINS
 - INFORMATION TECHNOLOGY ROLE
- ADJUDICATION
- URANIUM RECOVERY

COMMITMENT MANAGEMENT

RECENT ACTIVITIES

- PILOT PROGRAM CONDUCTED TO INCORPORATE COMMITMENTS RELIED UPON DURING STAFF REVIEW OF LICENSING ACTIONS INTO LICENSE CONDITIONS

- AUDITS OF COMMITMENT MANAGEMENT PROGRAMS AT 8 FACILITIES (FITZPATRICK, TMI, HATCH, SEQUOYAH, KEWAUNEE, PERRY, CALLAWAY, AND RIVER BEND) - (COMPLETED MAY 30, 1998)

- AUDIT FINDINGS

- LICENSEES IMPLEMENT
COMMITMENTS MADE TO STAFF

- DEFINITION OF "COMMITMENT"
VARIED (EX., ONE-TIME OR
ONGOING)

- VARYING DEGREES OF TRACEABILITY
& EVALUATION OF COMMITMENT
CHANGES

- AUDIT REPORTS HAVE BEEN ISSUED.

- STAFF PREPARING COMMISSION PAPER
TO REPORT THE AUDIT FINDINGS AND
RECOMMEND NEXT STEPS

August 7, 1998

MEMORANDUM TO: Thomas H. Essig, Acting Chief
Generic Issues and Environmental Projects Branch
Division of Reactor Program Management
Office Of Nuclear Reactor Regulation

FROM: Eileen M. McKenna, Senior Reactor Engineer Original Signed By:
Generic Issues and Environmental Projects Branch
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 6, 1998, MEETING WITH THE REGULATORY
COMPLIANCE AND TECHNOLOGY GROUP (RCTG)

On August 6, 1998, members of the NRC staff made a presentation at a meeting of the RCTG in Bethesda, Maryland. The staff presentation, which was open for public observation, was part of a workshop sponsored by the RCTG that had a number of industry participants. Attachment 1 provides a list of NRC attendees.

The purpose of the staff's presentation was to discuss topics of mutual interest relating to regulatory processes such as proposed rulemaking on 10 CFR 50.59 and commitment management. Attachment 2 provides the slides used by the NRC staff members during their presentation.

Attachments: As stated

cc: See next page

DISTRIBUTION: See attached list

DOCUMENT NAME: G:\EMM\MSUM0806.98

OFC	DRPM:PGEB	DRPM:PGEB	DRPM:PGEB
NAME	EMcKenna:ayw	FAkstulewicz	TEssig
DATE	8/7/98	8/17/98	8/17/98

OFFICIAL RECORD COPY