

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
WASHINGTON, D.C. 20555-0001

March 20, 2000

**NRC REGULATORY ISSUE SUMMARY 2000-06
CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS FOR
ADOPTING STANDARD TECHNICAL SPECIFICATIONS
CHANGES FOR POWER REACTORS**

ADDRESSEES

All holders of operating licenses for nuclear power reactors, except those who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel.

INTENT

The U.S. Nuclear Regulatory Commission (NRC) is issuing this regulatory issue summary (RIS) to inform the addressees of the opportunity to participate as applicants in the consolidated line item improvement process (CLIP) for Technical Specifications (TS) amendments. The CLIP facilitates licensees' adopting of NRC-accepted changes to the Standard Technical Specifications (STS) for their specific plant TS. This process is intended to streamline the license amendment review process involving NRC-accepted STS changes in order to increase NRC efficiency and reduce unnecessary regulatory burden. The NRC role in maintaining plant safety is achieved by the technical review of proposed changes to the STS as well as plant-specific applications to adopt NRC-accepted changes to the STS. In addition, the CLIP is intended to increase public confidence by making NRC's work process more visible to its stakeholders.

The CLIP improves the efficiency of the NRC licensing processes by reviewing and documenting STS change requests in a manner that supports subsequent license amendment applications. By soliciting comments from NRC stakeholders, the CLIP enhances the visibility of the staff's review and revision processes for the STS as well as subsequent license amendment applications. Following the staff's resolution of public comments on a proposed change to the STS, the licensees may submit a license amendment application to adopt the NRC-accepted change by citing the relevant information which would have been made available. Each amendment application made as part of the CLIP will be processed and noticed in accordance with applicable rules and NRC procedures.

This RIS does not create any new or changed NRC requirements or staff positions, and it requires no specific action or written response. Participation in the CLIP is purely voluntary.

BACKGROUND INFORMATION

The STS for the five vendor designs include Babcock & Wilcox (NUREG-1430), Westinghouse (NUREG-1431), Combustion Engineering (NUREG-1432), General Electric Boiling Water Reactor/4 (BWR/4) (NUREG-1433), and General Electric BWR/6 (NUREG-1434). The review of a proposed generic change to the STS is a multi-staged process designed to ensure that each STS remains internally consistent, maintains coherence among the various vendors' STS, and incorporates the knowledge and operating experience of the industry and the NRC.

Changes to the STS NUREGs, which are potentially applicable to multiple plants, are proposed to the NRC by the Nuclear Energy Institute (NEI) sponsored Technical Specification Task Force (TSTF) through publicly available submittals. The TSTF includes representatives from the four U.S. commercial nuclear power plant owners groups and NEI. The NRC staff reviews the changes to the STS proposed by the TSTF (referred to as TSTF changes) and will accept, modify, or reject them. Once TSTF changes are accepted, they are considered to be part of the STS. Individual licensees may propose to adopt the TSTF changes during a conversion to the STS or as a separate license amendment application.

The objective of the CLIP is to improve the efficiencies in the processes for NRC review and licensees' preparation of license amendment applications for NRC-accepted TSTF changes. This is primarily accomplished through multiple licensees being able to use the approved safety evaluation prepared for the TSTF change in connection with amendment applications for specific plants. In an effort to make the NRC work processes more visible, the NRC staff will solicit stakeholder comments on the associated change to the STS, the staff's safety evaluation (SE), and the proposed no significant hazards consideration determination (PNSHCD) before finalizing its acceptance of a TSTF change. Following NRC acceptance of a TSTF change, licensees, as well as the NRC staff, will be able to use the relevant documentation from the NRC-accepted TSTF change in the preparation and processing of license amendment applications. Some of the features of CLIP incorporate lessons learned from the staff's experiences during the development of the STS and related NRC Policy Statements on TS improvements (e.g., issuing generic letters to announce the availability of "line item improvements" to TS).

The CLIP would allow efficient adoption of the TSTF changes by licensees that have converted to the STS, as well as by licensees that have not converted to the STS but have determined that the TSTF changes are applicable to their facilities. This process would streamline the documentation process for both the NRC and the licensees. Furthermore, stakeholder involvement would be fostered from the beginning of this process.

SUMMARY OF ISSUE

The purpose of the CLIP is to streamline the license amendment review process involving TSTF changes applicable to multiple plants. By using a standardized process such as the CLIP, the burden on an individual licensee would be reduced by saving resources in preparing license amendment applications and, at the same time, the NRC staff review process would become more efficient. The attached flow chart details the process flow for the CLIP. There are three required participants in the process flow map: the NEI TSTF, the NRC staff, and the licensees. In addition, all NRC stakeholders are provided an opportunity to comment on a proposed TSTF change before NRC acceptance of the change, as well as to participate in the

licensing process for each license amendment application. The major aspects of this process are summarized as follows:

1. The CLIP will improve the efficient adoption of NRC-accepted TSTF changes by having the staff prepare and publish a safety evaluation (SE). A TSTF change request from the NEI TSTF will include a technical justification and a PNSHCD as part of the proposal. The TSTF change process supports subsequent license amendment applications.
2. Following its preliminary review, the NRC staff will use a *Federal Register* notice (FRN) and the NRC website to inform and solicit comments from NRC stakeholders regarding the proposed TSTF changes that will be incorporated into the CLIP. The stakeholders will be provided with a description of the TSTF change, the staff's preliminary safety evaluation, and a PNSHCD. After the NRC staff resolves the public comments, another FRN and the NRC website will be used to notify NRC stakeholders if the TSTF change has been accepted by the NRC staff and, if accepted, that the TSTF change is available for adoption in proposed plant-specific license amendment applications.
3. The licensees desiring to adopt a specific TSTF change using the CLIP will need to verify that the proposed change is applicable to their facilities. The NRC announcement and the staff's SE will specify any plant-specific verification or other information required in licensees' applications. The licensees may apply for license amendments by citing the applicability of the PNSHCD and the SE for the accepted TSTF change and addressing any plant-specific information needed to support the staff's review. In order to obtain the maximum efficiency gains from the CLIP, the NRC will recommend that the licensees submit their applications within a specified time following the FRN announcing that the TSTF change has been accepted.
4. Each amendment application made as part of the CLIP will be processed and noticed in accordance with applicable rules and NRC procedures. The NRC efficiency gains are achieved by reducing the plant-specific reviews for those changes that are common to multiple licensees.

By using this process, the CLIP would allow licensees that have converted to the STS to efficiently adopt the accepted TSTF changes subsequent to the conversion. It would also facilitate efficient adoption of accepted TSTF changes as STS evolve for nonconverted plants. Finally, with the licensee's adoption of the uniform description of the proposed change, the PNSHCD, and the SE for a TSTF change request, the CLIP would provide more disciplined and consistent adoption of the STS by way of a streamlined amendment process.

BACKFIT DISCUSSION

This RIS does not request any action or written response; therefore, the staff did not perform a backfit analysis.

FEDERAL REGISTER NOTIFICATION

A notice of opportunity for public comment on this RIS was not published in the *Federal Register* because the CLIP is simply a more effective and efficient application of existing regulations and NRC work processes. The process was developed with opportunities for input from stakeholders during public meetings. The CLIP adds opportunities for the public to participate in the licensing process.

PAPERWORK REDUCTION ACT STATEMENT

This RIS does not request any information collection.

If there is any question about this RIS, please contact the persons listed below.



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Attachments:

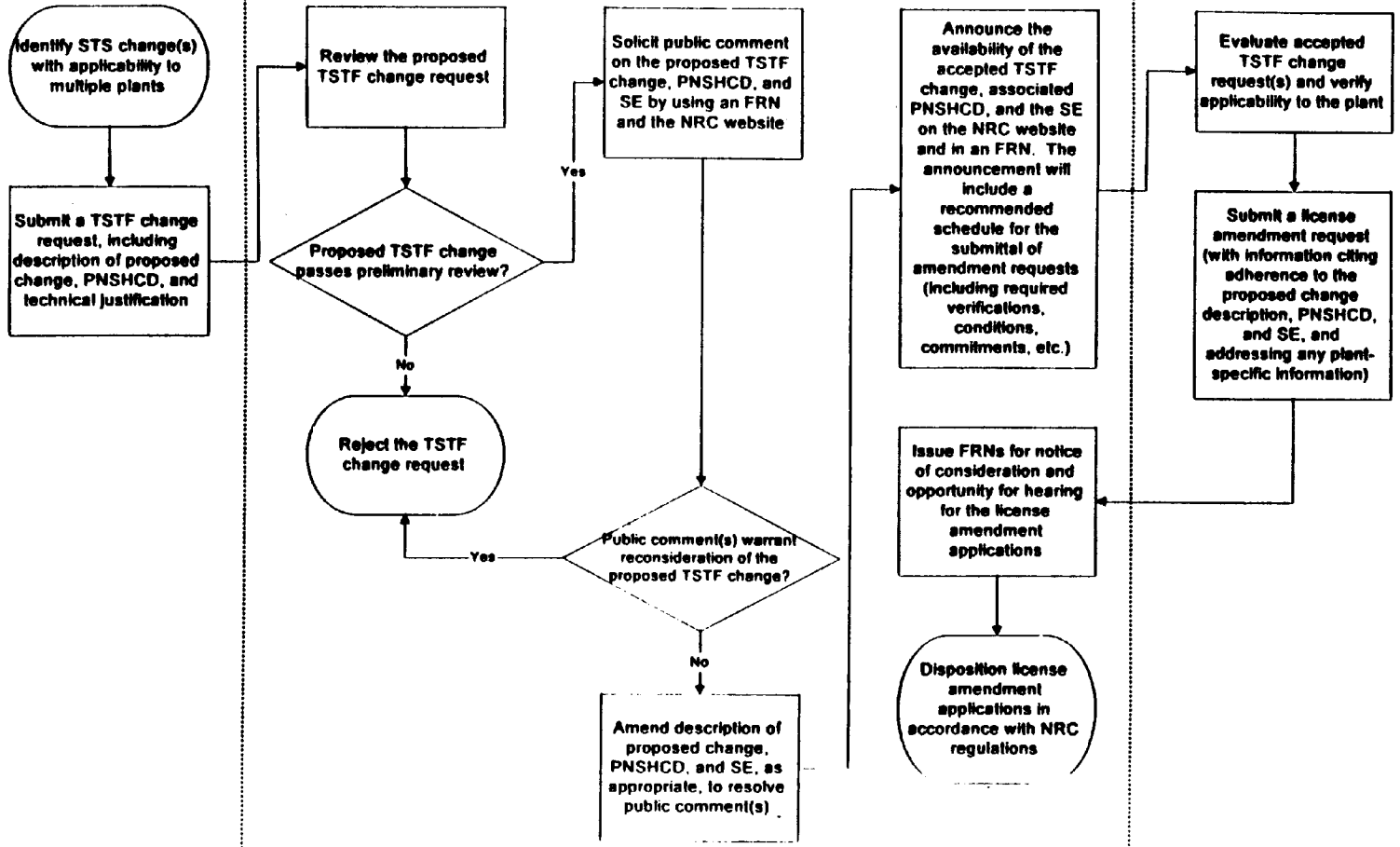
1. Consolidated Line Item Improvement Process (CLIP) Flow Chart
2. List of Recently Issued NRC Regulatory Issue Summaries

Consolidated Line Item Improvement Process (CLIP) Flow Chart

NEI TSTF

NRC

Licensees



LIST OF RECENTLY ISSUED
NRC REGULATORY ISSUE SUMMARIES

Regulatory Issue Summary No.	Date of Subject	Issuance	Issued to
2000-05	Resolution of Generic Safety Issue 165, Spring-Actuated Safety and Relief Valve Reliability	03/16/2000	All holders of OLs for nuclear reactors, except those licensees who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel
2000-04	Operating Reactor Licensing Action Estimates	03/16/2000	All power reactor licensees
2000-03	Resolution of Generic Safety Issue 158: Performance of Safety- Related Power-Operated Valves Under Design Basis Conditions	03/15/2000	All holders of OLs for nuclear reactors, except for those licensees who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel
2000-02	Closure of Generic Safety Issue 23, Reactor Coolant Pump Seal Failure	02/15/2000	All holders of OLs for nuclear reactors, except for those licensees who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel
2000-01	Changes Concerning Foreign Ownership, Control, or Domination of Nuclear Reactor Licensees	02/01/2000	All holders of OLs for nuclear reactors