

The Role of NEI LATF and Managing the Imposition of Preliminary Generic Positions during Plant-Specific Licensing Actions and Inspections



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Power

Strategic Teaming and Resource Sharing

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PRESENTATION TOPICS

- The Role of the NEI Licensing Action Task Force (LATF)
- Preliminary Generic Positions and Plant Specific Licensing Actions and Inspections

NEI LATF

NEI Licensing Action Task Force

- Organized over 8 years ago
- Anticipated life, 2 years
- Still an active task force



EVOLVING SCOPE

- Created to address some specific licensing process issues
- Development and resolutions of those issued took longer than anticipated
- Additional and emergent issues identified



NRC INTERFACE

- Originally NRC created its own LATF
- Good management support from industry and NRC
- Became a focal point to candidly discuss potential issues

LATF SUCCESSES

- Some prominent successes (e.g., CLIIP)
- Many minor procedure or guidance adjustments
- Industry (e.g., LAR guidance, NEI 06-02) and NRC activity

SIDE BENEFITS

- Through the LATF forum, the industry and NRC has gained a better understanding of each others activities and motivations
- NEI LATF has become a licensing issues clearinghouse for the industry

LICENSING PROCESSES

- Require ongoing oversight and adjustment
- Change management is challenging, especially for long standing processes (e.g., relief requests)
- **Patience and Persistence**



CURRENT NEI LATF

- Don Woodlan Chairman (Jim Fisicaro stepped down after eight years)
- Keith Jury, Vice Chairman
- Mike Schoppman, NEI Coordinator
- Steering group meets quarterly with NRC
- Teams created to address specific issues



CURRENT NRC INTERFACE

- NRC no longer has a task force
- NRC interface has been assigned to a deputy director in projects. A description of the interface activity is being written. The NRC lead brings other staff members as appropriate based on the issues being addressed.



LATF'S FUTURE

- Will continue to pursue ways to make the licensing processes for the industry and the NRC more efficient and effective.
- While remaining Patient and Persistent, NEI LATF will also pursue ways to make the enhancements more quickly.



PRELIMINARY GENERIC POSITIONS AND PLANT SPECIFIC LICENSING ACTIONS AND INSPECTIONS



SCOPE OF CONCERN

- One of the challenges is that different parties view the concern differently
- LATF wants to focus on how to handle current licensing activity for which a pending generic issues exists
- The scope and key terms need to be defined and agreed upon

RELATIVE IMPORTANCE

- Concern has been around for a while (discussed at several LATF meetings as well a licensing forum)
- Significant impact on licensees and NRC in terms of resources and cost
- Considered a high priority item

OPTIONS

- Stop all related licensing activity
- Require licensees to adopt interim solutions as part of licensing action
- Approve licensing action based on current licensing basis (and status of the rest of the industry) until resolved generically



BACKGROUND

- Previous attempts to discuss the concern have not gotten very far.
- Difficult to discuss the process without discussing previous examples
- The previous examples are filled with passion and the discussions quickly degrade



GOING FORWARD

- We don't know the best answer today
- NEI to develop and issue a white paper as a straw-man to initiate stake holder dialogue
- Focus on scope, problem statement and key terms/definitions initially

OBJECTIVES

- Identify a process ensures timely action taken when safety issues so dictate
- Allow licensing action activity and inspection activity to proceed in a timely manner without imposing interim solutions unnecessarily



PERSPECTIVE

- NRC handles the vast majority of potential generic issues
- These exceptions are glaring, highly impactful and completely inappropriate.
- If allowed to spill over to “new plants” potential applicants may withdraw or not be able to get financing.



SUMMARY

- In past, we have failed the “Predictable, Repeatable” aspect of a good regulatory process
- We need to work together, and with other stakeholders, to develop and implement a good process
- One issue, one review, one answer.

