

September 5, 2000

MEMORANDUM TO: William D. Travers
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary /RA/

SUBJECT: STAFF REQUIREMENTS - SECY-00-0092 - COMBINED LICENSE REVIEW PROCESS

Subject to the comments provided below, the Commission has approved 1) the proposed ITAAC verification program, 2) the treatment of QA deficiencies related to ITAAC verification, and 3) the form and content of the generic COL. As part of the Part 52 rulemaking process, the staff should take further steps to ensure that our stakeholders understand with greater detail and specificity how the staff's recommendations on these three items, and on the issue of programmatic ITAAC, would be implemented. The staff should remain open to improvements or alternative approaches that our stakeholders may suggest.

Also in connection with the Part 52 rulemaking, the staff should specifically seek comment on and continue to work with stakeholders on the need for and scope of the ITAAC for programmatic areas (e.g., QA programs, fitness for duty). The staff should work with our stakeholders on developing, to the extent practical, an approach for the development of programmatic ITAAC that are reasonably objective and precise. Subsequent to these discussions, the staff should formally provide the Commission with a recommendation as to how to proceed on programmatic ITAAC, the basis for this recommendation, a discussion of alternatives proposed by stakeholders, a legal analysis supporting the recommendation, and a thorough description of how the staff would implement its recommendation.

To the extent that changes to the reactor oversight program may have a bearing on aspects of the ITAAC verification program, the staff should ensure consistency between the agency's inspection program and any site-specific inspection guidance for ITAAC verification. Moreover, the staff should take note of changes in QA requirements that may result from agency initiatives in risk-informed regulation to ensure consistency between the requirements imposed on ITAAC for future plants and requirements for currently operating plants.

While approving the form and content of the generic COL, the staff should ensure that any plant-specific limitations or conditions are added to plant-specific COLs, as appropriate, as is the case of current Part 50 licenses.

While resolving these issues in the context of Part 52 rulemaking, the timeline for these activities should not unnecessarily delay bringing significant issues to the Commission's attention for resolution. Efforts to identify, understand and resolve issues early will only provide greater certainty and confidence in the rulemaking process.

cc: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield
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