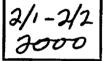
U.S. NUCLEAR REGULATORY COMMISSION

NRC FORM 658 (9-1999)

TRANSMITTAL OF MEETING HANDOUT MATERIALS FOR IMMEDIATE PLACEMENT IN THE PUBLIC DOMAIN

This form is to be filled out (typed or hand-printed) by the person who announced the meeting (i.e., the person who issued the meeting notice). The completed form, and the attached copy of meeting handout materials, will be sent to the Document Control Desk on the same day of the meeting; under no circumstances will this be done later than the working day after the meeting. Do not include proprietary materials.

DATE OF MEETING



The attached document(s), which was/were handed out in this meeting, is/are to be placed in the public domain as soon as possible. The minutes of the meeting will be issued in the near future. Following are administrative details regarding this meeting:

MA6986

Docket Number(s)

Plant/Facility Name

TAC Number(s) (if available)

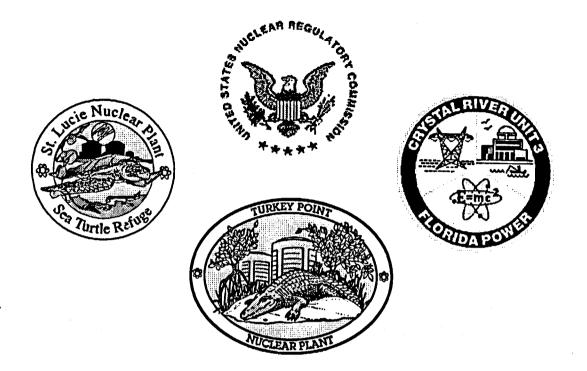
Reference Meeting Notice

Purpose of Meeting (copy from meeting notice)

50-250,251, 335, 389, Turkey Point 3/4 ST. Lucie 1+2 Crystal River 3

January 14, 2000 Discuss procedures for processing licensing submittals, and other Icensing issues.

NAME OF PERSON WHO ISSUED MEETING NOTICE TITI F Senior Project Manager conard A. WIENS OFFICE NRR DIVISION OLPM BRANCH Distribution of this form and attachments: **Docket File/Central File** PUBLIC



NRC/FPL/FPC LICENSING WORKSHOP St. Lucie Plant February 1-2, 2000

AGENDA

NRC, FP&L and FPC Licensing Workshop

February 1-2, 2000

Plant St. Lucie

February 1 st		
8:00 - 8:15	Introduction/Orientation	Facility Host Herb Berkow
8:15 - 8:45	Electronic FSAR	Paul Infanger
8:45 - 9:15	Electronic Technical Specifications	-Crystal River Margaret DiMarco -St. Lucie
9:15 - 9:45	NOEDs : (inc. Weather Related)	Herb Berkow
9:45 - 10:00	Break	All
10:00 - 10:30	Regulatory Issues: Status of Design Bases, FSAR, and 10 CFR 50.72/73 Projects	Rich Correia
10:30 - 11:00	10 CFR 50.59	Len Wiens
11:00 - 11:30	Attributes of a Good Relief Request	Kahtan Jabbour
11:30 - 12:30	Lunch	
12:30 - 12:45	ADAMS Status	Karen Cotton
12:45 – 1:45	Licensing Processes - NRC Perspective - Environmental Assessments	Robert Martin Len Wiens
1:45 - 2:45	Licensing Processes - FP&L	Ed Weinkam
	- FPC	Steve Franzone Sid Powell
2:45 - 3:00	Break	
3:00 – 4:15	Attributes of a Good Submittal Breakout	Facilitators: Ed Weinkam Steve Franzone Sid Powell
4:15 – 5:00	Summary/Conclusions Breakout	Facilitators

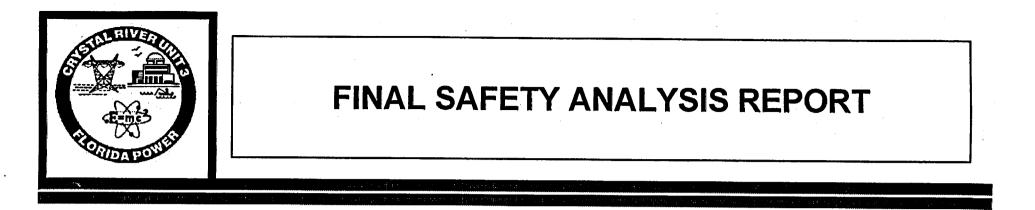
AGENDA (Continued)

NRC, FP&L and FPC Licensing Workshop

February 1-2, 2000

Plant St. Lucie

February 2 nd		
8:00 - 8:30	Risk Informed Applications - Rule-Making	Rich Correia
8:30 - 9:00	Role of Project Manager	Kahtan Jabbour
9:00 - 10:15	Critique Licensing Submittals Breakout	Facilitators
10:15 -11:00	Summary/Conclusions from Breakout	Facilitators
11:00 - 11:30	Workshop Conclusions and Closing Comments	Herb Berkow Facility Host
11:30	End of Workshop	

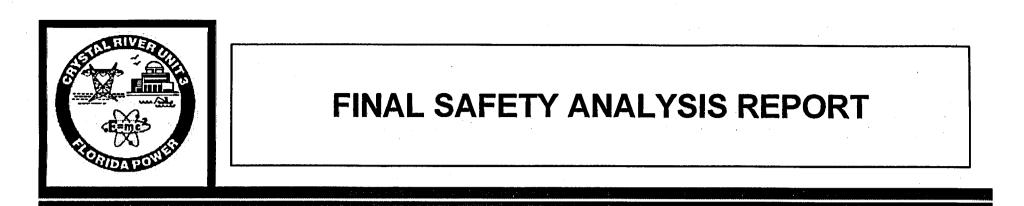


ELECTRONIC FSAR

Presented by:

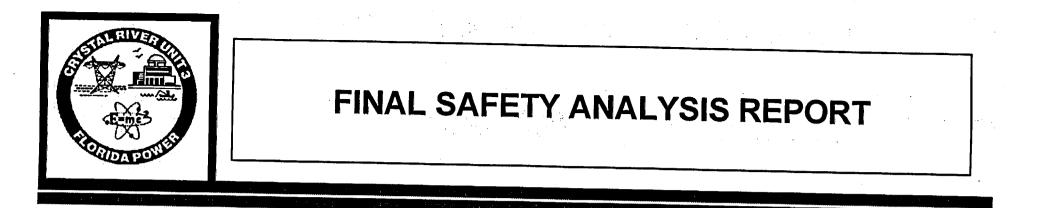
Paul Infanger

February 1, 2000



• Electronic Format

- > Ease of use
 - » FPC workers and vendors familiar with Adobe Acrobat (free viewer)
 - » Built-in search tools
 - » "Perfect" printouts
 - » Cross-platform
- Convenient and portable
 - » Loaded on FPC LAN
 - » CD-ROM copies available
- Improved change history and tracking



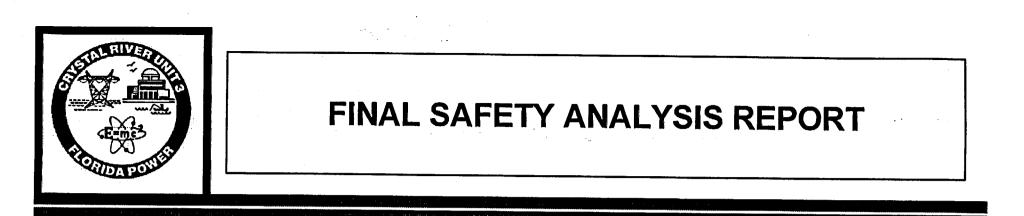
- Saves production cost
 - > Reduced the number of paper Controlled Copies on-site from 63 to 9
 - Issue about 20 CD-ROMs to vendors and employees
 - Reduced NRC copies from 11 paper to 2 paper and 4 CD-ROMs



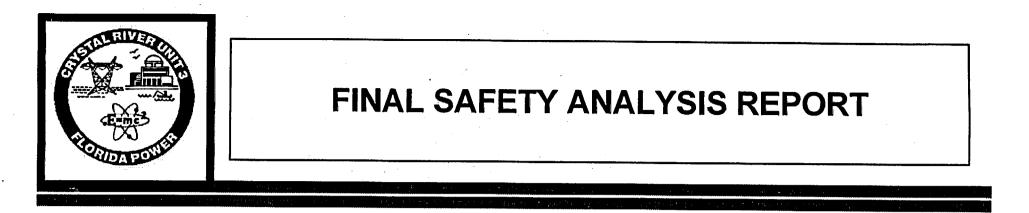
FINAL SAFETY ANALYSIS REPORT

Living FSAR

- > Interim Revisions "quarterly"
- > Keeps FSAR current
 - » NRC will get update mid-February current to 12/31
- > Projected changes file
- > Reduces burden for NRC revision

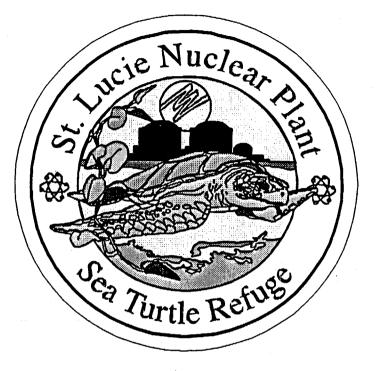


- Software
 - > Native files in Microsoft Word
 - Process into PDF with Adobe Acrobat Version 4.0
 - > Add Hyperlinks and Bookmarks with Ambia Compose
 - » Autobookmarker (uses Word Styles to make TOC)
 - » Hyperlinks for Tables and Figures



• Summary

- Saves money, time and effort
- Improved product, more current and accessible
- > Workers and vendors like it
- > NRC acceptance
- > Eleven plants have inquired on "How to"



Electronic Technical Specifications Presented by: George Madden & Margaret Dimarco February 1, 2000



- Objective:
 - Place Unit 1 and Unit 2 Technical Specifications On-Line in a Controlled environment
 - Ability to retrieve, view, search and print Controlled Technical Specifications from desktop



- Project Plan
 - Replicated Electronic Procedures
 - Word Processed Tech Specs When Time Allowed
 - Created PDF Files And Links
 - Proof Reading Final Product Prior To Implementation
 - Target Implementation May 2000



- Each TS Page Is Controlled As a Separate File in Word and Adobe Acrobat (PDF)
- Individuals PDF Pages Are Combined Into One PDF Document Per Unit
- Created Hyper Links by Section Within the PDF Document



Organization

- Technical Requirements Manual
 - This Is Relocated Tech Specs
- Facility Operating License
- Tech Specs Appendix A
- Tech Specs Appendix B



- Appendix A - Unit 1 Tech Specs

- List of Effective Pages
- Index
- Section 1.0 Definitions
- Section 2.0 Safety Limits and Limiting Safety System Settings
 - Bases for 2.0 Safety Limits and Limiting Safety Settings
- Sections 3.0 and 4.0 Limiting Conditions for Operation and Surveillance Requirements
 - Sections 3/4.0 Through 3/4.11
 - Bases for Sections 3.0 and 4.0
- Section 5.0 Design Features
- Section 6.0 Administrative Controls

FPL ELECTRONIC TECH SPECS

- Benefits
 - Approximately 50 Hard Copies of Controlled Tech Specs
 - This Can Be Reduce to Less Than 10
 - Less Time to Make Revisions
 - Each Employee Will Have Access to Tech Specs From Their Desktop
 - Ability to Perform Word Search More Accurately and in Less Time
 - Support NRC Electronic License Submittal
 - Ability to Submit Electronic Mark-Ups Opposed to Pen and Ink
 - Ability to Email Final Pages in PDF Format



- Potential Improvement Opportunities:
 - Administrative Change to Replace Existing
 Tech Specs With the Electronic PDF Version
 - Administrative Change to Re-number Tech
 Spec Section Pages (Change 3/4 1-1a, 3/4 1-1b,
 etc. To 3/4 1-1, 3/4 1-2, etc. By Renumbering
 the Existing Pages by Section)
 - Eliminate Blank Pages

NOTICES OF ENFORCEMENT DISCRETION

REVISED STAFF GUIDANCE - PART 9900



Herb Berkow Division of Licensing Project Management Office of Nuclear Reactor Regulation

SIGNIFICANT CHANGES TO THE NOED GUIDANCE

PART 9900 GUIDANCE WAS REVISED ON JUNE 29, 1999

- PROCESS IMPROVEMENTS FOR NOEDS RELATING TO SEVERE WEATHER OR OTHER NATURAL EVENTS
 - Previously an enforcement discretion, now an NOED
 - Prior Commission approval not required
- STAFF DOCUMENTATION CHANGES

PROCESSES FOR ADDRESSING NON-COMPLIANCE WITH REQUIREMENTS

NOEDS ARE APPROPRIATE ONLY FOR NON-COMPLIANCE WITH TS OR OTHER LICENSE CONDITIONS

NOEDS ARE <u>NOT APPROPRIATE</u> FOR NON-COMPLIANCE WITH:

- REGULATIONS -PROCESS EXEMPTIONS -10 CFR 50.12
- CODES -PROCESS RELIEFS -10 CFR 50.55a
- UFSAR -CHANGE PER 10 CFR 50.59 OR OPERABILITY DETERMINATION GL 91-18 REV. 1 AND PROCESS LICENSE AMENDMENT -10 CFR 50.90

TWO TYPES OF NOEDs

 (1) RADIOLOGICAL SAFETY CONSIDERATIONS (REGULAR NOED)

FORCED COMPLIANCE WITH LICENSE WOULD INVOLVE PLANT-RELATED RISKS DUE TO UNNECESSARY TRANSIENT

 (2) OVERALL PUBLIC HEALTH AND SAFETY CONSIDERATIONS (A SEVERE EXTERNAL CONDITION -RELATED NOED).

FORCED COMPLIANCE WITH LICENSE MAY AFFECT GRID STABILITY, EXACERBATING IMPACTS OF SEVERE WEATHER OR OTHER NATURAL EVENTS ON OVERALL PUBLIC HEALTH AND SAFETY **SEVERE WEATHER/NATURAL EVENT NOEDS**

- HISTORY & EVOLUTION
- CURRENT GUIDANCE & PRACTICE
 - government or responsible independent entity makes assessment that need for power and overall public health & safety considerations constitute an emergency situation
 - staff must balance public health & safety implications with potential radiological risks
 - •• risks must be acceptably small
- EXAMPLES 4 granted
- WEATHER-RELATED VS. "REGULAR" NOED compliance issue vs. degraded or inoperable component/system

OTHER PROCESS CHANGES

- ALL NOED-RELATED TELECONFERENCES ARE MADE THROUGH THE NRC HEADQUARTERS EMERGENCY OPERATIONS CENTER RECORDED TELEPHONE LINE (301) 816-5100.
- LICENSEES ARE NO LONGER REQUIRED TO STATE WHETHER:
 - prior adoption of TS enhancement initiatives (GL 87-09, Line Item Improvements or the Improved Standard TS) would have obviated the need for the NOED
 - the noncompliance involves a USQ
 - FOR ALL NOEDs (REGIONAL OR NRR) REGION TO OPEN AN UNRESOLVED ITEM (URI).
 - This will facilitate:
 - tracking
 - verification of resolution activities
 - documentation and closure of inspection
 - enforcement action determination

NRC, FP&L and FPC LICENSING WORKSHOP

STATUS OF DESIGN BASES, UFSAR, and 50.72/73 PROJECTS



Richard P. Correia U.S. NRC 301-415-2024 RPC@NRC.GOV

OBJECTIVE

Provide clear guidance on what constitutes design bases information as defined in 10 CFR 50.2

BACKGROUND

- Engineering team inspections (late 1980s)
- Industry Guidelines (NUMARC 90-12) design bases reconstitution
- NUREG-1397 assessment of design control practices and reconstitution programs

BACKGROUND (CONT.)

Commission Policy Statement (August 1992)

- Acknowledged industry efforts
- Emphasized importance of understanding and maintaining design bases
 - Plant physical and functional characteristics are maintained and are consistent with the design bases as required by regulation
 - SSCs can perform their intended functions
 - Plant is operated in a manner consistent with design bases
- Millstone and Maine Yankee Lessons Learned
- 10 CFR 50.54(f) Letters
- Enforcement issues

RELEVANCE OF DESIGN BASES

Design Bases used in the following regulations:

- ► 50.34 (FSAR content)
- ► 50.59 (Changes effective 2000)
- ► 50.72, 50.73 (Reporting)
- ► Appendix A to part 50 (GDC)
- Appendix B to part 50 (QA)
- Used to evaluate degraded and nonconforming conditions

NRC ACTIVITIES

- Interact with Industry on NEI 97-04
- Publish draft Regulatory Guide (RG) endorsing revised NEI 97-04 (11-17-99)
- Consider changing 10 CFR 50.2 definition

STAFF ACTIVITIES and TENTATIVE SCHEDULES

- Draft Commission Paper under Management review (Jan. 2000)
- Publish draft RG after Commission approval (Feb. 2000)
- Resolve comments on draft RG (June 2000)
- ACRS and CRGR briefings (July 2000)
- Commission Paper with final RG (Aug, 2000)

REGULATORY GUIDE for the CONTENT of UFSARs

BACKGROUND

- FSAR updates required by 10 CFR 50.71(e)
- Guidance contained in:
 - ► RG 1.70, rev. 3 (November 1978)
 - Generic letter 80-110 (December 1980)
- NRC determined additional guidance was needed (Millstone Lessons Learned -February 1997)
 - Ensure UFSARs updated to reflect changes to design bases
 - Reflect effects of other analyses performed since original licensing
 - · Concentral middance includes

BACKGROUND (cont.)

Commission Direction (June 1998)

- Disapproved staff recommended Generic letter
- Continue to work with Industry on NEI 98-03
- Establish enforcement discretion period for 6- to 18month period after final guidance issued, depending on risk significance

MORE RECENT ACTIVITIES

- NRC Staff and Industry public meetings to resolve differences
- DG-1083 and SECY 99-001
- DG-1083 published for comment endorsing NEI 98-03, rev. 0

PUBLIC COMMENTS ON DG-1083

Incorporation by reference

- Position: Part of UFSAR, therefore, docketed and subject to 50.59 and 50.71(e)
- Resolution: reference materials on file, but not on docket

Information retention for safety significant SSCs

- Position: NEI 98-03 not to be used to remove information on safety significant SSCs
- Resolution: NEI 98-03 clarified consistent with staff position

PUBLIC COMMENTS ON DG-1083 (CONT.)

Removal of drawings

 NEI 98-03 added guidance on conditions for removal of drawings

Removal of commitments

NEI 98-03 changed to clarify that only obsolete or less meaningful commitments may be removed

SECY 99-203 and REGULATORY GUIDE 1.181

- Endorses NEI 98-03, rev. 1 as acceptable to meet 10 CFR 50.71(e)
- NEI 98-03, rev. 1 acceptable for allowing improvements and simplification of content and format of UFSARs
- Does not supersede any prior commitments

SRM -SECY-99-203

Commission approved publication of RG 1.181

- Inform Commission on results of FSAR updates monitoring efforts
 - Whether guidance for UFSAR updates or design bases needs revision
 - Whether additional regulatory oversite is warranted
 - Ensure a representative sample of FSARs is examined
- Clarified certain RG language
- Ensure consistency with regulatory guide for design bases

Staff Activities

- Developing monitoring program per Commission direction
- Enforcement discretion for risk-significant matters expires March 31,2000
- Enforcement discretion for less risk significant matters expires March 31, 2001

BACKGROUND

SECY-98-036 (March 4, 1998)

- Proposed rulemaking plan
- SRM-98-036 (May 14, 1998)
 - Commission approved plan
- ANPR published (July 23, 1998)
 - Requested public comments
 - Public meetings
 - ► NEI "table top exercises"

PROPOSED RULES OBJECTIVES

- Better align reporting requirements with NRC needs for information
- Reduce reporting burden
- Clarify reporting requirements where needed
- Maintain consistency with NRC actions to improve integrated plant assessments

COMMISSION DIRECTION

SRM 99-119 (June 15, 1999)

- Commission approved staff recommendations to publish proposed rules
- Invite comment and determine need for reports on historical problems
- Seek comment on new requirement to report component problems:
 - Significantly degrade ability to fulfill safety function
 - Could affect similar components

RECENT ACTIVITIES

- Proposed Rule published (June 25, 1999) for 75 day comment period
- Staff currently preparing final rule

10 CFR 50.59 RULEMAKING

LEN WIENS

NRC/FP&L/FPC

LICENSING WORKSHOP

SCHEDULE

- FINAL RULE ISSUED IN FR ON 10/4/99
- NEI SUBMITTED NEI 96-07, REV 1 IN DECEMBER 1999
- NRC REG GUIDE TO BE ISSUED IN LATE 2000
- IMPLEMENTATION IS 90 DAYS AFTER RG ISSUED

MAJOR CHANGES

REMOVAL OF REFERENCE TO USQ

- TERM "SAFETY EVALUATION" CHANGED TO "10 CFR 50.59 EVALUATION"
- ADDED DEFINITION OF "CHANGE" AND "FACILITY AS DESCRIBED IN THE FINAL SAFETY ANALYSIS (AS UPDATED)"

MAJOR CHANGES (continued)

- WILL ALLOW FOR MINIMAL CHANGES, WITHOUT REQUIRING PRIOR NRC APPROVAL
- CHANGED "PROBABILITY" TO "INCREASE IN FREQUENCY" OR "LIKELIHOOD OF OCCURRENCE"
- MALFUNCTION OF A DIFFERENT TYPE IS BEING REPLACED WITH "MALFUNCTION WITH A DIFFERENT RESULT"

MAJOR CHANGES (continued)

- MARGIN OF SAFETY EVALUATION CRITERIA IS REPLACED WITH 2 NEW CRITERIA:
 - CRITERIA (vii) EVALUATION OF INTEGRITY OF FISSION PRODUCT BARRIERS
 - CRITERIA (viii) CHANGES TO APPROVED EVALUATION METHODS

IMPACTS AND BENEFITS

IMPACTS

- WILL REQUIRE MAJOR REVISION TO 50.59 PROCEDURES
- WILL REQUIRE NEW TRAINING STANDARDS TO BE DEVELOPED

BENEFITS

- OVERALL IMPROVEMENT OVER PREVIOUS RULE LANGUAGE
- AGREED UPON INDUSTRY/NRC GUIDANCE

Submitting Relief Requests to the NRC

Kahtan Jabbour, NRC Project Manager

Subjects	10 CFR 50.55a Paragraph
Reactor Coolant Pressure Boundary	50.55a(c)
Quality Group B Components	50.55a(d)
Quality Group C Components	50.55a(e)
Inservice Testing Items	50.55a(f)
Inservice Inspection (examination) Items	50.55a(g)
Protection Systems	. 50.55a(h)

10 CFR 50.55a Subjects

Methods to Use to Ask for Relief

- I. Propose an alternative to the code requirement and show that:
 - the alternative provides an <u>acceptable level of quality and safety</u> pursuant to 10 CFR 50.55a(a)(3)(i), or
 - complying with the code requirement would result in <u>hardship or</u> <u>unusual difficulty</u> without a compensating increase in quality or safety pursuant to 10 CFR 50.55a(a)(3)(ii).
- II. Show that the code requirement is <u>impractical</u> (not just inconvenient) pursuant to 10 CFR 50.55a(f)(6)(i) for inservice testing items or 50.55a(g)(6)(i) for inservice inspection (examination) items.

Methods the NRC Can Use to Authorize an Alternative or Grant Relief

- <u>Authorize</u> a licensee-proposed <u>alternative</u> in accordance with 10 CFR 50.55a(a)(3)(i) if NRC determines that the alternative provides an <u>acceptable level of quality and safety</u>, or
- <u>Authorize</u> a licensee-proposed <u>alternative</u> (if any) in accordance with 10 CFR 50.55a(a)(3)(ii) if NRC determines that complying with the specified requirement would result in <u>hardship or unusual difficulty</u> without a compensating increase in the level of quality and safety, or
- <u>Grant relief</u> and impose alternative requirements in accordance with 10 CFR 50.55a(f)(6)(i) for inservice testing items if NRC determines that the code requirement is <u>impractical</u>, or
- <u>Grant relief</u> and impose alternative requirements in accordance with
 10 CFR 50.55a(g)(6)(i) for inservice inspection (examination) items if
 NRC determines that the code requirement is <u>impractical</u>.

Table 1 — Relief Request Guidance

10 CFR 50.55a Section	Applicable Table
10 CFR 50.55a (a)(3)(i)	see Table 2
10 CFR 50.55a (a)(3)(ii)	see Table 3
10 CFR 50.55a (f)(6)(i)	see Table 4
10 CFR 50.55a (g)(6)(i)	see Table 5
10 CFR 50.55a (g)(6)(ii) (A)(5)	see Table 5

Note: Pick the single, most applicable 10 CFR 50.55a section to address.
 Note: The NRC can only authorize an alternative that the utility proposes in their written submittal. The utility must prepare another written submittal proposing (other) alternatives if they decide or agree with the NRC to use (other) alternatives.

Table 2 — Authorizing a Proposed Alternative in Accordance with10 CFR 50.55a(a)(3)(i)

Purpose	<u>Authorize</u> a utility-proposed alternative in accordance with 10 CFR 50.55a(a)(3)(i).
Necessary Determination	Determine if the utility-proposed alternative provides an acceptable level of quality and safety.
	Indicate the applicable Code edition and addenda, and describe the Code requirement.
	➡ Describe the proposed alternative <u>and bases</u> .
Guidance	Discuss why the proposed alternative provides an acceptable level of quality and safety.
	Specify the duration of the proposed alternative.
	»+ Do not mention impracticality, burden, unusual difficulty or hardship.

Table 3 Authorizing a Proposed Alternative in Accordance with10 CFR 50.55a(a)(3)(ii)

Purpose	Authorize a utility's proposed alternative in accordance with 10 CFR 50.55a(a)(3)(ii).
Necessary Determinations	Determine if complying with the specified requirement would result in <u>hardship or unusual difficulty</u> (rather than being impractical) without a compensating increase in the level of quality and safety.
	For <u>ISI items</u> — Determine if the proposed alternative provides <u>reasonable assurance of pressure boundary</u> integrity.
	For <u>IST items</u> — Determine if the proposed alternative provides reasonable assurance that the <u>component or</u> <u>system is operationally ready</u> (capable of performing its intended function).
	Indicate the applicable Code edition and addenda, and describe the Code requirement.
•	➤ Describe the utility-proposed alternative and bases.
Guidance	➤→ Discuss why complying with the specified requirement would result in <u>hardship or unusual</u> <u>difficulty</u> without a compensating increase in the level of quality and safety.
	For <u>IST items</u> : Discuss why the proposed alternative provides reasonable assurance that the component or system is operationally ready.
	For <u>ISI items</u> : Discuss why the proposed alternative provides reasonable assurance of pressure boundary integrity.
	➤→ Specify the duration of the proposed alternative.
	► Do not mention impracticality.

Table 4 Inservice Testing — Granting Relief in Accordance with10 CFR 50.55a(f)(6)(i)

Purpose	<u>Grant relief</u> and impose alternative requirements in accordance with 10 CFR 50.55a(f)(6)(i) for <u>inservice</u> <u>testing</u> items.
	Determine if the code requirement is impractical.
Necessary Determinations	Determine if the proposed testing provides reasonable assurance that the <u>component is operationally ready</u> (capable of performing its intended function).
	► Indicate the applicable Code edition and addenda.
	Describe the utility's proposed alternative (if any) and bases.
	Describe why it is <u>impractical</u> for the utility to comply with the specified requirement.
Guidance	Describe the <u>burden</u> on the utility created by imposing the requirement (e.g., having to replace a component, redesign the system or shutdown the plant).
	Discuss why the proposed testing provides reasonable assurance that the component is operationally ready.
	Note: 10 CFR 50.55a(f)(6)(i) allows the NRC to impose additional requirements without having the utility first commit to them. 10 CFR 50.55a(a)(3) does not allow this.
	Specify the duration of the alternative.
	➡ Do not mention hardship or unusual difficulty.

Table 5 Inservice Inspection — Granting Relief in Accordance with10 CFR 50.55a(g)(6)(i)

11	
Purpose	<u>Grant relief</u> and impose alternative requirements in accordance with 10 CFR 50.55a(g)(6)(i) for inservice inspection (examination).
	Determine if the code requirement is impractical.
Necessary Determinations	Determine if the proposed <u>inservice inspection</u> (examination) provides reasonable assurance of component or structure pressure boundary integrity.
Guidance	► Additional guidance in Generic Letter 90-05
	➤ Indicate the applicable Code edition and addenda, and describe the Code requirement.
	➡ Describe the proposed alternative (if any) and bases.
	➤ Describe why it is <u>impractical</u> to comply with the specified requirement.
	➤→ Describe the <u>burden</u> created by imposing the requirement (e.g., having to replace a component, redesign the system or shutdown the plant).
	➤ Describe why the proposed inspection (examination) provides reasonable assurance of component or structure pressure boundary integrity.
	Note: 10 CFR 50.55a(f)(6)(i) allows the NRC to impose additional requirements without having the utility first commit to them.
	➤→ Specify the duration of the alternative.
	➡ Do not mention hardship or unusual difficulty.

Note: For augmented <u>reactor vessel shell weld examination</u> reliefs we <u>authorize</u> a proposed alternative IAW 10 CFR 50.55a(g)(6)(ii)(A)(5) if we determine that the alternative provides an <u>acceptable level of</u> <u>quality</u> (rather than the code requirement being impractical).

AGENCYWIDE DOCUMENT MANAGEMENT & ACCESS SYSTEM (ADAMS)

NRC/FP&L/FPC WORKSHOP FEBRUARY 1-2, 2000 LEN WIENS

WHAT IS IT?

MAINTAIN READ-ONLY RECORDS THAT CAN BE READ FROM MULTIPLE SITES

FULL TEXT SEARCH CAPABILITY BY NRC AND PUBLIC

- ELECTRONIC DOCUMENTS BECOME OFFICIAL RECORD
- REPLACES NUDOCS

STATUS

 11/1/99 - STEPPED IMPLEMENTATION STARTED WITH SCANNING OF DOCUMENTS INTO ADAMS - PAPER COPIES REMAINED OFFICIAL RECORD

 1/1/00 - NRC STAFF COMMENCED ENTERING INTERNAL DOCUMENTS INTO ADAMS - PAPER COPIES REMAIN OFFICIAL RECORD

STATUS (cont)

TBD - TERMINATE PAPER RECORDKEEPING -ADAMS DOCUMENTS ARE OFFICIAL RECORDS

- TERMINATE PAPER DISTRIBUTION OF INCOMING DOCUMENTS, WITH LIMITED EXCEPTIONS
- LIVING DOCUMENTS (TECH SPECS, UFSAR) WILL CONTINUE TO HAVE PAPER DIST.

ELECTRONIC INFORMATION EXCHANGE (EIE)

FUTURE SYSTEM TO PROVIDE ELECTRONIC DOCUMENT EXCHANGE TO AND FROM NRC

PARTICIPATION IS VOLUNTARY

PARTICIPATION IN EIE

MUST HAVE ACCESS TO INTERNET VIA INTERNET EXPLORER OR NETSCAPE

- APPLY FOR AND BE GRANTED A "DIGITAL CERTIFICATE".
- 5 MEG (1000 PAGES) LIMIT. LARGER DOCUMENTS WITH PRIOR NOTICE.

PARTICIPATION IN EIE (cont)

DOCUMENT SUBMITTALS:

- ► PDF NORMAL
- ► PDF
- ► WORD
- WordPerfect
- MAY BE EXPANDED LATER (ASCII)

EIE PROCESS

ELECTRONICALLY SIGN DOCUMENT PLACE ON EXTERNAL SERVER SEND EMAIL TO RECIPIENT NO PUBLIC ACCESS TO EIE

EXTERNAL ACCESS

ACCESS NRC EXTERNAL WEB (NRC.GOV)

CLICK ON "PUBLIC ELECTRONIC READING ROOM" AT BOTTOM OF PAGE

FOLLOW INSTRUCTIONS OR CALL LISTED NUMBERS FOR HELP

SENSITIVE INFORMATION

PROPRIETARY, SECURITY, PRIVACY INFORMATION PROTECTED BY ADAMS PROCEDURES AND SOFTWARE

SAFEGUARDS INFORMATION WILL NOT BE INCLUDED IN ADAMS

NUDOCS

DOCUMENTS PRIOR TO 11/1/99 WILL CONTINUE TO BE KEPT IN MICROFICHE WILL NOT BE CONVERTED TO ADAMS CAN SEARCH FOR DOCUMENT BY TITLE IN ADAMS LEGACY LIBRARY

LICENSE AMENDMENT REVIEW PROCEDURES NRR OFFICE LETTER 803, REV 3

BOB MARTIN NRR PROJECT MANAGER

Policy

- Atomic Energy Act Section 182a
- IO CFR 50.36, Technical Specifications
- In CFR 50.90, Application for Amendment of License
- In CFR 50.91, Notice for Public Comment; State Consultation
- I 10 CFR 50.92, Issuance of Amendment

Objectives of OL 803

- Ensure public health and safety
- Promote consistency in processing of license amendments
- Improve internal and external communications
- Increase technical consistency for similar licensing actions
- Reduce delays in issuance of license amendments
- Ensure that staff RAIs are adding value to the regulatory process
- Provide NRR staff with an improved framework for processing license amendment applications

Initial Processing

- Amendments
 - Acceptance review
 - Work planning
 - Prioritization

Acceptance Review

- Oath & Affirmation, State copy
- Clear description of change
- Safety analysis and justification
- NSHC and EA (or exclusion)
- Approval and implementation schedules
- Is it risk-informed?

Work Planning

PM and technical staff

- Search for precedents
- Review method (PM or tech staff)
- Scope & depth of review
- Resource planning and schedule
- Priority

Priority

Priority 1

- Highly risk-significant safety concern
- Issue involving plant shutdown, derate, or restart

Priority 2

- Significant safety issue
- Support continued safe plant operations
- Risk-informed licensing action
- Topical report with near-term or significant safety benefit

Priority

Priority 3

- Moderate to low safety significance
- Cost beneficial licensing actions
- Generic issue or multi-plant action
- Topical report with limited benefit

NSHC Determination

■NSHC Based on 50.92 (51 FR 7751)

- Significant increase in probability or consequences of an accident
- Possible new or different accident
- Significant reduction in margin of safety
- If proposed NSHC, hearing *can* be after amendment
- If SHC or no determination, any hearing would precede amendment

Noticing

- "Normal" amendments, 50.91(a)(2)
 - Bi-weekly or individual Federal Register notices-30 day comment period
 - Notice of proposed amendment, proposed NSHC, hearing opportunity
 - Notice of issuance
- If a proposed NSHC determination is not made, use individual notices
 - Can't be handled as an exigent or emergency

Noticing- Exigent Amendment

- Notice in Federal Register (FR) if amendment is to be issued after 15 days but before 30 days
 - Individual FR notice
 - Repeat in bi-weekly FR notice
- Notice in local media if amendment is to be issued after 6 days but before 15 days
 - Repeat in bi-weekly FR notice
- Amendments require a final NSHC determination

Noticing - Emergency Amendment

Emergency amendments noticed after issuance for comment and an opportunity for hearing

Reviewer Assignments

- Reviews can be performed by PM or technical staff, considerations include:
 - Technical complexity & risk significance
 - PM technical expertise
 - Conformance to improved Standard Technical Specifications (STS) guidance
 - Conformance to precedents
 - Resource availability & schedule needs

Review Process and Documents Preparation

Review process

- Precedents
- Requests for additional information (RAIs)
- Regulatory commitments
- Document preparation
 - Safety evaluation
 - Concurrence review
 - Amendment issuance

Review Process and Documents Preparation

Precedents

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Ensure request meets current expectations

- Format
- Guidance to industry
- Technical content

Review Process and Documents Preparation

- Requests for additional information
 - Staff goal: 1 RAI per reviewing technical branch
 - Notify the licensee
 - -Discuss questions
 - -Resolve minor issues
 - Answers needed to make regulatory finding are placed on the docket
 - -Establish reasonable response date
 - -Document conversation on cover letter
 - Questions should be developed with consideration of regulatory basis of the request

- Regulatory commitments are information relied on by the staff in making its conclusion but are not included in the TS
- Current staff practice outlined in SECY-98-224, NRC guidance on commitment management
- Office letter 900 to be issued Spring 2000
 - Will provide further guidance

Hierarchy of licensing basis information

- Obligations license, TS, Rules, orders
- Mandated licensing-basis information UFSAR, QA/security/emergency plans
- Regulatory Commitments docketed statements agreeing or volunteering to take specific actions
- Non-licensing basis information

- Commitments stated in the safety evaluation are considered part of the licensing basis but are not legally binding requirements
- Safety evaluation should clearly state what actions are considered regulatory commitments
- Control of commitments is in accordance with licensees' programs

- Escalation to license conditions reserved for safetysignificant matters (e.g., those that meet 10 CFR 50.36 criteria for inclusion)
- Staff is continuing to include license conditions for relocation of information to UFSAR or other controlled documents in amendment implementation

Safety Evaluation

Routinely included

- Staff evaluation why the request satisfies regulatory requirements
- State consultation
- Environmental considerations

As needed

- Regulatory commitments
- Emergency/exigent provisions
- Final NSHC determination

Concurrence

- Licensing Assistant
 - Format and revised TS pages
- Technical Branch
 - Technical adequacy
- Technical Specifications Branch
 - Significant deviations from ISTS guidance or changes consistent with ISTS
 - ► Use of 10 CFR 50.36 criteria
- Office of the General Counsel
 - Legal defensibility and completeness

Amendment Issuance

Ensure that we've addressed all comments from public and state

Transmitted to licensee via letter

Issued after associated EA

Standard distribution (cc) list

- Notify NRC staff of licensee's organization changes to list via docketed letter

- Federal Register notice of issuance

ENVIRONMENTAL ASSESSMENTS



LEN WIENS

ENVIRONMENTAL ASSESSMENTS

REQUIREMENTS

- 10 CFR 51.21
 - ALL LICENSING ACTIONS UNLESS
 - REQUIRE EIS
 - MEETS CATEGORICAL EXCLUSION
 - OTHER ACTIONS PER 51.22(d)
 - SPECIAL CIRCUMSTANCES
 - NRC DISCRETION DUE TO UNIQUE, UNUSUAL OR CONTROVERSIAL CIRCUMSTANCES

CATEGORICAL EXCLUSIONS

10 CFR 51.22

- C.8 OPERATOR LICENSING
- C.9 OPERATING REQUIREMENTS
- C.10 ADMINISTRATIVE PROCEDURES
- C.12 SAFEGUARDS
- C.21 TRANSFERS

10 CFR 51.22C.9

APPLIES TO:

- REQUIREMENTS WITHIN THE RESTRICTED AREA AS DEFINED BY 10 CFR 20, OR
- CHANGES TO INSPECTIONS OR SURVEILLANCE REQUIREMENTS

PROVIDED:

- ► NSHC, AND
- NO SIGNIFICANT CHANGE IN TYPES OR SIGNIFICANT INCREASE IN AMOUNT OF EFFLUENTS, AND
- NO SIGNIFICANT INCREASE IN INDIVIDUAL OR CUMULATIVE EXPOSURE

10 CFR 51.22(C)10

- CHANGES TO SURETY, INSURANCE AND/OR INDEMNITY REQUIREMENTS
- CHANGES TO RECORDKEEPING, REPORTING, OR ADMINISTRATIVE PROCEDURES OR REQUIREMENTS
- GENERALLY APPLIES TO ADMINSTRATIVE CONTROLS SECTION OF TS
- DOES NOT INCLUDE CHANGES TO CORRECT TYPOGRAPHICAL ERRORS OR EDITORIAL CHANGES

PROCEDURAL GUIDANCE

- NRR OFFICE LETTER 906
- TYPES OF ACTIONS REQUIRING EA
 - EXEMPTIONS
 - AMENDMENTS WHICH INCREASE SFP STORAGE CAPACITY
 - NRC DISCRETION
 - POWER UPRATES (IF INCREASED POWER NOT COVERED UNDER ORIGINAL FES)
 - LICENSE RENEWAL
 - DECOMMISSIONING
 - EPP CHANGES

RESPONSIBILITY

NRC STAFF RESPONIBLE FOR PREPARATION

MAY REQUEST INFORMATION FROM LICENSEE IN ORDER TO MAKE FINDING

GENERALLY, IF IN DOUBT AS TO WHETHER AN ENVIRONMENTAL ASSESSMENT WILL BE REQUIRED, ASK THE PROJECT MANAGER

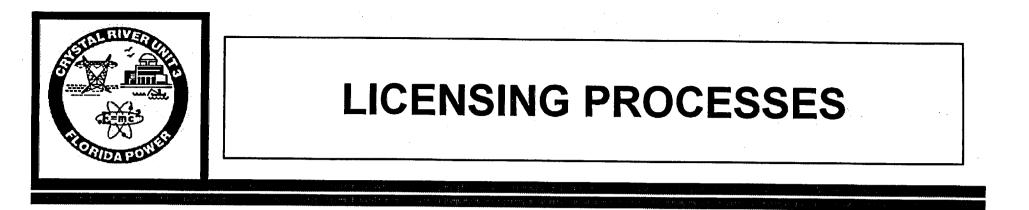


FPC / FP&L / NRC LICENSING WORKSHOP

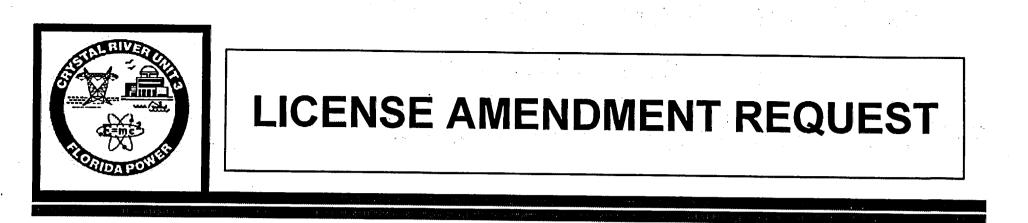
LICENSING PROCESSES

Presented by: Sid Powell

February 1, 2000



- LICENSE AMENDMENT REQUEST (LAR)
 PREPARATION
- LICENSE AMENDMENT IMPLEMENTATION



- INITIATION and EVALUATION
- **RESOURCES**
 - ♦ Recent History
 - ♦ Future Plan
- DEVELOPMENT
 - ♦ Technical Resources
 - ♦ Licensing Engineer
- TRACKING



LICENSE AMENDMENT REVIEW BOARD (LARB)

- CONCEPT
- QUORUM
 - Chairman (MNL or Designee)
 - ♦ Operations
 - ♦ Engineering
 - Licensing (not the responsible Licensing Engineer)
 - Others as designated

RESPONSIBILITIES

- Technical content
- ♦ Workability
- ♦ Schedule
- Implementation Plan



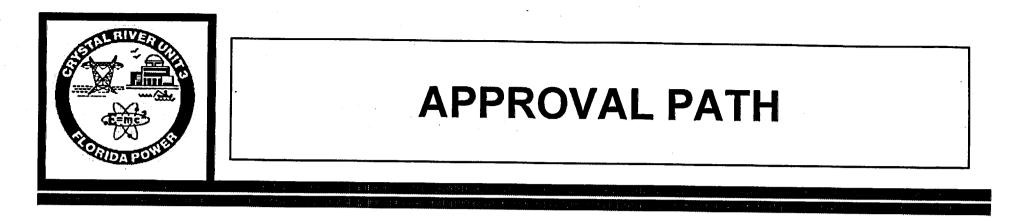
APPROVAL PACKAGE (THE RED FOLDER)

• CONTENTS

- Cover Form
- ♦ Draft Submittal
- Support Organization Review/Concurrence Form
 - » Includes Peer Review
- Commitment Identification Form
- Applicable Regulatory and Internal Correspondence
- Validation Package

RESPONSIBILITIES

- ♦ Licensing Engineer
- Technical Lead



- LARB
- PLANT REVIEW COMMITTEE
 - One Week Prior to Meeting
- TECHNICAL and MANAGEMENT REVIEW
- ADMINISTRATIVE REVIEW (Parallel Process)
- NUCLEAR GENERAL REVIEW COMMITTEE
 - Quarterly Meetings
 - ♦ Briefings and Telecon Votes
- FINAL SIGNATURE



LICENSE AMENDMENT APPROVAL

Time Goes By

7



LICENSE AMENDMENT IMPLEMENTATION

IMPLEMENTATION PLAN

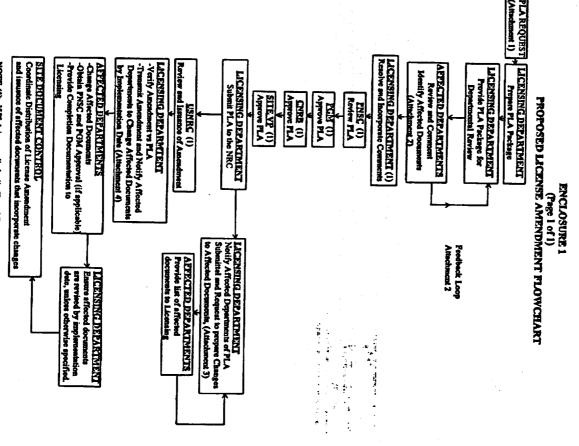
- Developed and Approved by the LARB
- Input to Corrective Action System by Licensing Engineer
 - » Precursor Card (PC)
- Actions Assigned to Responsible Organizations
 - » Completed Actions Approved by Responsible Organizations
 - » PC Closure Approved by Licensing
- LICENSE AMENDMENT REVIEW
 - ♦ Licensing Engineer
 - ♦ LARB
 - ♦ Administrative
- DOCUMENT CONTROL DISTRIBUTION



PTN LICENSING PROCESS

Presented by: Steve Franzone February 1, 2000

TN LICENSING PROCESS



NOTE (1): If PLA is cancelled, all affected Departments shall be notified accordingly. Attachment 5 or similar form.

2

TN LICENSING PROCESS

SITE LICENSING CORRESPONDENCE REVIEW SHEET

SITE VF DUE DATE 1/26/00 NRC DUE DATE: 2/3/00

SUBJECT: Reador Operator - License Renewal

Please identify on the attached copy those action items, which are your responsibility, and have not been completed/implemented. Licensing will track the identified items on CTRAC.

Note: Nuclear Policy NP-309 states that the person whose signature or initials have been applied to this document acknowledges personal knowledge of and accepts full responsibility for the correctness of the information contained in the document. If a person is only initialing a particular element of this document, that in turn is the extent of his responsibility, and shall be identified as such.

PLEASE REFER ALL QUESTIONS TO RESPONSIBLE LICENSING ENG .: OLGA HANEK X-6601

CNRB REVIEW; (Moning Number / Date) DOCUMENT NOTARIZED NA PNSC REVIEW: REVIEWER L.O. Jones Plant General Munager S.M.Franzone Proofread: have opened and/or closed the items listed below in CTRAC. (Name) PNSC CHAJRMAN × Licensing, Menager Operations Manager IIILE/DEPARTMENT DOCUMENT NEVIEW (Originator/data) Vice President PNSC MEETING No. NA DOCUMENT DATE STAMPED SIGNATUREDATE

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Letter mailed to NRC

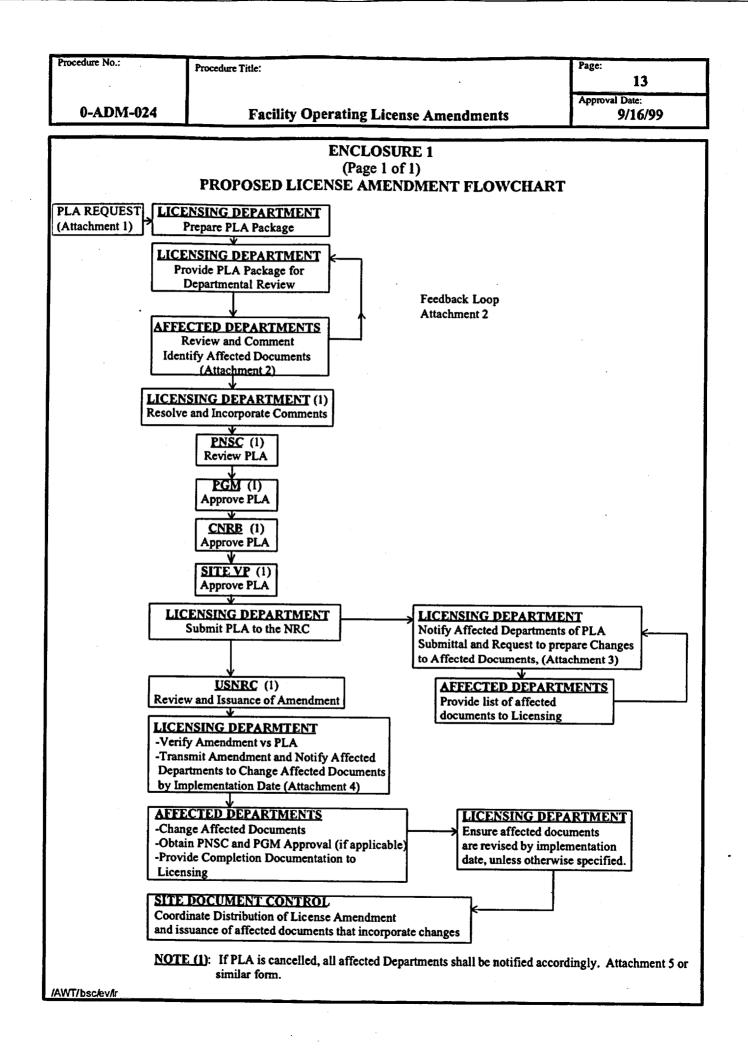
(Nemc/date)

Emailed to PCC_

(Name/date)

280273, 940212

CTRAC OFFENED:



SITE LICENSING CORRESPONDENCE REVIEW SHEET

L-2000-xxx

SITE VP DUE DATE <u>1/26/00</u> NRC DUE DATE: <u>2/3/00</u>

SUBJECT: <u>Reactor Operator - License Renewal</u>

Please identify on the attached copy those action items, which are your responsibility, and have not been completed/implemented. Licensing will track the identified items on CTRAC.

Note: Nuclear Policy NP-309 states that the person whose signature or initials have been applied to this document acknowledges personal knowledge of and accepts full responsibility for the correctness of the information contained in the document. If a person is only initialing a particular element of this document, that in turn is the extent of his responsibility, and shall be identified as such.

PLEASE REFER ALL QUESTIONS TO RESPONSIBLE LICENSING ENG .: OLGA HANEK X-6607

DOCUMENT REVIEW REVIEWER **TITLE/DEPARTMENT** SIGNATURE/DATE T. O. Jones **Operations Manager** S. M. Franzone Licensing Manager PNSC REVIEW: N/A PNSC MEETING No. N/A PNSC CHAIRMAN See Attached Plant General Manager Vice President Proofread: (Name) **CNRB REVIEW:** N/A (Meeting Number / Date) **DOCUMENT NOTARIZED** N/A DOCUMENT DATE STAMPED (Name) (Name) I have opened and/or closed the items listed below in CTRAC: (Originator/date) **CTRAC OPENED:** Letter mailed to NRC. Emailed to PCC (Name/date) (Name/date)

Risk-Informed Regulatory Activities



Risk-informed regulation

PRA results/insights + deterministic insights

SECY-95-126 NRC Policy Statement on use of PRA

- PRA should be used in regulatory matters to the extent supported by the state of the art
- PRA should be used to reduce unnecessary conservatism
- PRA evaluations should be as realistic as possible
- PRA uncertainties need to be considered in applying Commission's safety goals

Major Areas of Risk-Informed Regulation

- Licensing
 Inspection
 Enforcement
- Performance Assessment

Significant Licensing Documents

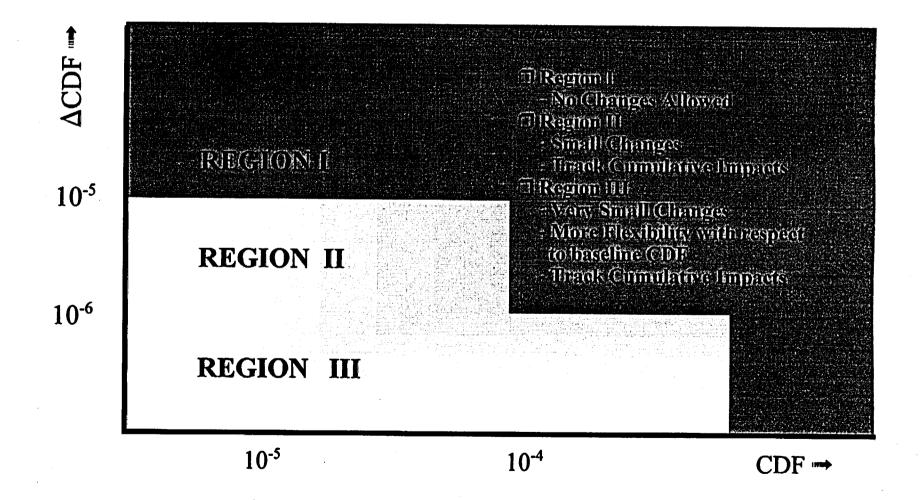
RG 1.174 Changes to licensing basis
RG 1.175 Inservice Testing
RG 1.176 Graded Quality Assurance
RG 1.177 Technical Specifications
RG 1.178 Inservice Inspection

Principles

Risk-informed Integrated Decisionmaking

- Meets current regulations
- Defense-in-depth
- Maintain safety margin
- Increased CDF or risk is small
- Monitoring

RG 1.174 Figure 3



Acceptance Guidelines for Core Damage Frequency (CDF)

Risk-Informed Licensing Action

...any activity that uses risk assessment insights or techniques to provide a key component for determining acceptability of the proposed action

Risk-Informed Licensing Actions

Special administrative handling

- Unique identifier
- Priority 2
- Management review
- Technical review
 - Traditional deterministic review
 - Assessment of strengths and weaknesses of risk evaluation
 - Balance between deterministic and risk components

Risk-Informed Licensing Actions

Most common types

- Diesel generator allowed outage time extension
- ECCS allowed outage time extension
- Risk-informed ISI, IST

Statistics

- ► Total RILA: ~110
- ► Approved to date: ~70

Management Oversight

- Risk-Informed Licensing Panel
 Resolution of conflicts
- Improved timeliness and efficiency
- SECY 99-246 (10/12/99)
 - Requested approval of proposed interim guidelines
- SRM-99-246 (1/5/00)
 - Commission approved staff approach

Risk-Informed Technical Specifications

- LCO required action end states
- Mode change flexibility
- Missed surveillances
- Risk-informed completion times
- LCO 3.0.3
- Operability definition
- Surveillance requirements coordinated with Maintenance Rule

Risk-Informed Part 50

SECY-98-300: Options for Risk-informed Revisions to 10 CFR Part 50, December 23, 1998

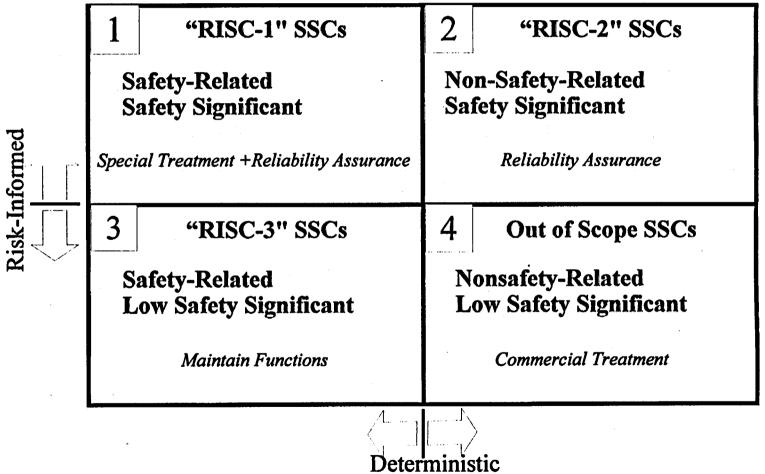
"Option 1" - Current rulemaking activities

 10 CFR 50.59
 10 CFR 50.72, 50.73
 10 CFR 50.55a

Risk-Informed Part 50 (cont.)

- SECY-99-256, "Rulemaking Plan for Risk-Informing Special Treatment Requirements"
 - Modified scope of SSCs subject to special treatment requirements such as EQ
 - Reduce unnecessary burden for large number of low safety-significant SSCs
 - Pilot plant exemptions: South Texas, others
 - Final rule planned for early 2002

Risk Categorization and Regulatory Treatment



Risk-Informed Part 50 (cont.)

- SECY-99-264, "Proposed Staff Plan For Risk-Informing Technical Requirements in 10 CFR Part 50"
- Office of Nuclear Regulatory Research study underway

DIVISION OF LICENSING PROJECT MANAGEMENT

ROLE OF PROJECT MANAGER



KAHTAN JABBOUR

DLPM FUNCTIONS

• LICENSING AUTHORITY

- •• Licensing Actions
- •• Mandated Controls
- •• Other Licensing Tasks

• INTERFACES

- •• Licensees/Owners Groups
- •• Regions
- •• Headquarters
- •• Public

REGULATORY IMPROVEMENTS

• TOTAL OF 75 SPECIFIC TASKS

EXAMPLES OF LICENSING AUTHORITY TASKS

LICENSING ACTIONS

- Amendments (TS & USQ)
- Exemptions
- Reliefs
- License Transfers
- NOEDs
- Lead Plant Reviews

<u>MANDATED</u> <u>CONTROLS</u>

- Bases Changes
- UFSAR Reviews
- 50.59 Reviews
- QA, Security, EP Reviews

OTHER

- TIAs
- 2.206s
- Backfits
- Plant-Specific MPAs
- Commitment Management
- Hearing Support

EXAMPLES OF INTERFACE TASKS

LICENSEES/ OWNERS GROUPS

- ROUTINE COMMUNICATIONS
- SITE VISITS/DROP-INS
- LEAD ON TECH ISSUES (MPAs, GSIs, USIs)

NRC <u>REGIONS</u>

- MORNING CALLS
- MGMT. OVERSIGHT PANELS
- ROUTINE COMMUNICATIONS
- TS INTERPRETATIONS
- ENFORCEMENT SUPPORT
- EVENT FOLLOWUP

NRC HQ

- MGT. INFO. & STATUS REPORTS
- MISC. LICENSEE REPORTS
- INCIDENT RESPONSE
- LIC. RENEWAL SUPPORT
- GENERAL SUPPORT TO OTHER OFFICES
- SURVEYS

PUBLIC

- CONTROLLED CORRESPONDENCE
- ALLEGATIONS
- FOIAs
- PLANT INFO WEB PAGE SUPPORT

EXAMPLES OF REGULATORY IMPROVEMENTS TASKS

- LATF
- OWNERS GROUP INTERACTIONS
- NRR OFFICE LETTERS
- REDEFINITION EFFORT
- DLPM HANDBOOK
- RULEMAKING
- RISK INFORMED EFFORTS
- LICENSING WORKSHOPS

TASK EVALUATION

• PERFORMANCE MEASURES INCLUDE:

- •• Timeliness
- •• Effectiveness
- •• Efficiency
- •• Quality
- •• Quantity
- TASKS PRIORITIZED WITH RESPECT TO STRATEGIC OUTCOME GOALS
 - •• Maintain Safety
 - •• Reduce Unnecessary Regulatory Burden
 - •• Increase Public Confidence
 - •• Increase Internal Efficiency & Effectiveness
- **RESOURCE ESTIMATES**

FP&L/FPC/NRC LICENSING WORKSHOP	
St. Lucie site	
Jensen Beach, Florida	
February 1-2, 2000	

On a scale of 1 to 10, please provide an *overall* rating for workshop effectiveness_____.

Excellent	Very Good	Good	Fair	Unsatisfactory
109-	87-	65	43-	21

1. COMMENT ON FORMAT AND CONTENT OF THE WORKSHOP.

2. WHAT WERE THE WORKSHOP'S STRENGTHS?

3. WHAT WERE THE WORKSHOP'S WEAKNESSES?

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	HOULD THESE WORKSHOPS BE HELD PERIODICALLY AND, IF SO, A HAT FREQUENCY?
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