

SUMMARY OF THE IP71003 WORKSHOP AT THE RIC

- The completion of all plant license conditions for the renewed license will be reviewed and verified.
- All LR commitments will be reviewed in some fashion; however, more detailed reviews will be conducted, on a sampling basis, for commitments involving plant components that are judged by the inspection team to be more risk significant.
- Other than the expectation to see the applicable revised or new implementing documentation associated with each commitment and evidence of any completed inspections, including OTIs, there are no expectations for the availability of documentation during the PRI beyond what was available during the IP 71002 inspection.
- Additionally, the degree of site organization involvement in the PRI is not expected to be any different than the IP 71002 inspection.
- During the PRI, the NRC will also be looking for whether, post-renewed license receipt, there were opportunities for the performance of LR-related activities that were missed prior to the plant's entry into its PEO.
- Also during the PRI, where components have been removed from an AMP, post-renewed license receipt, the NRC will be looking for the technical justification for that change.
- Further, post-renewed license receipt, where a licensee has changed a commitment, the NRC will be looking, during the PRI, to ensure that the commitment change was consistent with the provisions of 10 CFR 50.90, 50.59, and/or the guidance in NEI 99-04.
- The NRC will also be reviewing the activities that have taken place at the plant to meet the requirements of 10 CFR 54.37(b).
- The reports from the 3 different phases of IP 71003 will be stand alone documents.
- The NRC stated during this workshop that, unless a license condition of a plant's renewed license states otherwise, the LR SER is not an enforceable document.
- The NRC stated that the date of entry into the PEO is just another day under the renewed operating license; i.e., the only reason that plant operation would be suspended is if there was a legitimate safety issue justifying such an action. The timing for this action would be no different than at any other time the discovery of a comparable safety issue would occur.
- For multi-unit sites, depending on the details of the particulars involved, the NRC may be able to conduct one PRI for the site.
 - Each plant, however, will have its own RFO visit to observe RFO LR-related activities being performed.
- ① ➤ An NRC take-away from the workshop was to generate internal guidance for what needs to be included in the PRI reports.

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- ② ➤ Another NRC take-away was to look at their initial consideration for including the IP 71003 inspection under the ROP.
- ③ ➤ Yet another NRC take-away from the workshop was for the NRC to determine how the details relative to compliance with 54.37(b) are to be transmitted to the NRC.
 - A suggestion was made that the cover letter for the UFSAR update could have all the detail, would be docketed, and the applicable part of the UFSAR LR Supplement could be revised to only reference the cover letter, as applicable and appropriate.
 - The NRC imposed a break in the workshop at this point to discuss this amongst the management attendees to come to a decision on the issue. They were not able to do this and indicated they would try to have this resolved by the April NEI LRTF/NRC meeting.
- ④ ➤ Two other NRC take-aways from the workshop were for the NRC to determine how to document their positions on the meaning of "implemented" relative to OTIs and relative to other AMP activities.