

March 23, 2001

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SUBJECT: STEAM GENERATOR ACTION PLAN REVISION AND COMPLETION
OF ITEM NOS. 1.1, 1.2, 1.3, 1.4, 1.7, 1.8, 1.15, 2.1 and 2.2
(TAC NO. MB0258)

As discussed in the Steam Generator (SG) Action Plan dated November 16, 2000 (ADAMS Accession No. ML003770259), completion of each of the major milestones in the action plan is to be documented by a memorandum/report provided by the lead division to the associate directors in the Office of Nuclear Reactor Regulation (NRR). This memorandum documents completion of some of the milestones as described below.

In addition, the SG Action Plan has been revised as shown in Attachment 1 to this memorandum. The revisions made to the action plan are discussed in Attachment 2 to this memorandum. It should be noted that some of the target completion dates have been revised based on available resources. Revision of these target dates does not change the overall completion of all of the action plan items by October 31, 2001, as originally forecast.

The following paragraphs provide the details regarding completion of milestone Item Nos. 1.1, 1.2, 1.3, 1.4, 1.7, 1.8, 1.15, 2.1, and 2.2.

Item No. 1.1 Issue Regulatory Information Summary on SG Lessons Learned

On November 3, 2000, the NRC issued Regulatory Issue Summary (RIS) 2000-22, "Issues Stemming from NRC Staff Review of Recent Difficulties Experienced in Maintaining Steam Generator Tube Integrity" (ADAMS Accession No. ML003758988). The intent of issuing this RIS was to inform pressurized-water reactor licensees of issues stemming from the staff's review of (1) the circumstances of the SG tube failure at IP2, (2) SG tube integrity at Arkansas Nuclear One Unit 2 and (3) the analyses done to demonstrate that SG tube integrity at these facilities would be maintained during subsequent operation.

Completion of this item also completes IP2 Lessons Learned Task Group recommendation number 8 (SG Action Plan, Attachment 3, Item No. 8).

Item No. 1.2 Discuss steam generator action plan and IP2 lessons learned with industry and other external stakeholders

On December 20, 2000, a public meeting was held at NRC Headquarters with the Nuclear Energy Institute. The purpose of this meeting was to discuss the status of SG issues and potential resolutions. The SG Action Plan and IP2 lessons learned were discussed during this meeting. The details of the meeting are documented in a meeting summary dated February 20, 2001 (ADAMS Accession No. ML010520394). During this meeting, a handout was presented by the NRC titled, "Matrix of Potential Impacts of IP2 Lessons Learned." This handout lists issues applicable to the industry, NEI, EPRI, and NRC that came out of the recommendations from the IP2 Lessons Learned Task Group report as well as issues discussed in RIS 2000-22. The matrix shows the tasks such as NEI 97-06 and the EPRI guidelines that are potentially impacted by each of the issues. In a public meeting on February 28, 2001, Mr. J. Riley (NEI representative) stated that NEI has developed a database containing each of the industry issues and will coordinate with the NRC in the near future to prioritize the resolution of these issues.

With respect to interactions with other external stakeholders about the action plan and the IP2 lessons learned, the staff provided an opportunity for other external stakeholders to give input and comments during the December 20, 2000 meeting. A representative of the Nuclear Information and Resource Service provided comments on staff actions related to the IP2 event and comments on the steam generator workshop which is the subject of Item No. 1.15. Since the December meeting the staff has developed a service list for use in noticing steam generator public meetings and for distributing meeting summaries. This list includes other external stakeholders who occasionally attend steam generator meetings. At the February 28, 2001 meeting, other external stakeholders in attendance only expressed an interest in observing the meeting.

This action plan item relates to the IP2 Lessons Learned Task Group recommendation for NEI, EPRI, and industry, numbers 2a-2o, 3a, 3b, 4a, 4b, and 4c (SG Action Plan, Attachment 3, Items Nos. 2a-2o, 3a, 3b, 4a, 4b, and 4c). The final resolution of these recommendations is dependent on actions by NEI, EPRI, and industry. We understand that NEI will provide the NRC with a summary of actions taken, as applicable, to these recommendations.

Item No. 1.3 Subsequent to item 2, identify technical and management leads for each item and develop initial resource estimates

Attachment 1 to this memorandum provides a revised SG Action Plan which lists the lead individuals for each action plan item. Attachment 3 to this memorandum provides the initial resource estimates for NRR for FY2001 for the work associated with the SG Action Plan items. This attachment provides the analysis and assumptions used in estimating the resources and also provides the expected impact of the "new work" associated with the action plan.

Item No. 1.4 Brief management on resource estimates and invoke Planning, Budgeting and Performance Management (PBPM) process as appropriate

On December 27, 2000, the Director of the Division of Engineering was briefed by the Chief of the NDE and Metallurgy Section of the Materials and Chemical Engineering Branch (EMCB), EMCB staff, and the SG Action Plan Lead Project Manager regarding the resource estimates and impacts associated with the SG Action Plan. Interactions with the directors of the other NRR divisions took place to develop resource estimates and assess impacts. In addition, the NRR Leadership Team was briefed by the SG Action Plan Lead Project Manager on February 13, 2001. The information provided in these briefings is reflected in Attachment 3 to this memorandum. The PBPM process will need to be invoked when any major changes to the action plan resource estimates arise. Specifically, Item 1.5 relates to staff review of the ACRS recommendations on the DPO. Resources for this item were not included in estimates made after the action plan was developed since the ACRS recommendations were not available at that time. Item 1.5 has been revised to indicate that the PBPM process will be invoked in conjunction with the development of milestones for addressing ACRS recommendations, as appropriate.

Item No. 1.7 Determine need to incorporate new steam generator performance indicators into Reactor Oversight Process

Performance Indicators (PIs) have been developed in the various cornerstones of safety in the Reactor Oversight Process (ROP) to provide an early, objective indication of licensee performance problems. Clearly defined thresholds that are risk-informed, to the extent practical, have been included in the PIs to categorize licensee performance and initiate appropriate regulatory response to different levels of licensee performance. Licensees report PI data on a quarterly basis.

In a February 14, 2000 memorandum from the Division of Engineering (DE) to the Division of Inspection Program Management (DIPM) (ADAMS Accession No. ML003684850), DE proposed three SG-related PIs: One based on degradation condition (i.e., the number of degraded tubes in the SGs), a second based on structural integrity performance as identified during the refueling outage eddy current inspections, and a third based on operational primary-to-secondary SG tube leakage. At a January 24, 2001 meeting between DE and DIPM representatives, attendees identified three difficulties with implementing the proposed PIs. First, the information on degradation condition and structural integrity performance are not readily available throughout a cycle, contrary to current PIs. Rather, the information could only

be updated every 18 or 24 months. Second, the degradation condition does not provide an early, objective indicator of licensee performance problems. The term "degradation condition" refers to the categorization of inspection results into three groups, C-1, C-2, or C-3, based on the number of degraded and defective tubes. This categorization is required by licensees' technical specifications (TS). Because licensees with steam generators categorized as "C-3" may be managing that degradation very effectively (and operating experience to date supports this assumption), the staff does not want to penalize licensees with a PI tied to this categorization scheme. Third, even if one or more of these proposed PIs were put into place, it would not have the desired effect of immediate engagement with the licensee.

Of the three proposed PIs, primary-to-secondary operational leakage was considered the most viable because it could be readily assessed on a quarterly basis, so this option was explored at length. However, even in this case it was concluded that a SG operational leakage PI was not necessary to alert NRR to degraded SG conditions. Primary-to-secondary leakage is already covered under MC 2515, Appendix D, "Plant Status." In addition, tube failure experiences have shown that the normal leakages in SGs with degraded tubes have been steady and very low almost up to the time of tube failure. The observed leakages have been well below any reasonable PI thresholds that could be established and would not be predictive of SG tube performance. The PI would stay green and within a short time (one day) would turn red should a tube failure event occur. Therefore, a primary-to-secondary leakage PI would not help in taking regulatory actions before a SG tube failure event.

In summary, DE and DIPM agreed that the ROP needs to support the appropriate identification of and reaction to potential licensee performance problems related to maintaining SG tube integrity. It was agreed that PIs were not the appropriate vehicle for meeting these needs. Instead, the baseline inspection program and associated significance determination process (SDP) could and should be revised. This approach was determined to be the most appropriate because the baseline inspection program can provide early indications of licensee performance issues. The baseline inspection program can also provide for engagement of NRR's steam generator expertise on an as-needed basis. This activity is currently being worked as part of SG Action Plan Item No. 1.11. Additionally, inspector guidance on monitoring and reacting to identified primary-to-secondary operational leakage has been developed and will be incorporated into Part 9900, "Technical Guidance" in the NRC Inspection Manual in response to SG Action Plan Item No. 1.9.

Completion of this item also completes IP2 Lessons Learned Task Group recommendation number 5e and the portion of 5f related to PIs (SG Action Plan, Attachment 3, Item Nos. 5e and 5f). The portion of recommendation 5f related to the SDP is being worked as part of SG Action Plan Item No. 1.11 as discussed above.

Item No. 1.8 Recommence work on NEI 97-06

As discussed in the November 1, 2000, memorandum from S. Collins to W. Travers that transmitted the IP2 SG Tube Failure Lessons Learned Report, the effort to review the industry initiative NEI 97-06, "Steam Generator Program Guidelines," was deferred to allow the staff sufficient time to properly assess the issues arising from the IP2 SG tube failure event. The lessons learned report also contained a specific recommendation as follows.

“The NRC should assign a high priority to its review of the NEI SG initiative and the associated EPRI guidelines. The NRC should use the SECY-00-0116 process, once approved, to expedite the review of the NEI 97-06 initiative.”

The staff has concluded that the technical issues identified during our review of the circumstances surrounding the IP2 tube failure do not compromise the regulatory framework outlined in the NEI 97-06 initiative. The Lessons Learned Task Group implied in the above recommendation that the staff is reviewing the associated EPRI guidelines. While the staff is knowledgeable of the guidelines and provides comments to industry on concerns with them, it should be noted that the staff does not plan to endorse the EPRI guidelines. One of the main reasons for this is that the revised NEI 97-06 regulatory framework will be performance-based and it is the licensees' responsibility to implement steam generator programs that will ensure the performance criteria are met. Furthermore, the industry has ongoing activities to update the guidelines and needs to have this flexibility to respond to new information, issues, or technology changes. Our focus remains on the regulatory framework set forth in NEI 97-06, rather than the lower-tiered EPRI guideline documents. As of January 2001, the staff has recommenced its review of NEI 97-06. We plan to use the SECY-00-0116 process, as appropriate.

Item No. 1.15 Hold steam generator workshop with stakeholders

On February 27-28, 2001, a steam generator workshop was held at the Bethesda Holiday Inn. In addition to NRC staff, participants included representatives from NEI, Argonne National Laboratories, and industry. In setting up the workshop NRC staff solicited the involvement of representatives from the Union of Concerned Scientists (UCS), Public Citizen, and the Nuclear Information and Resource Service. These organizations declined to participate as presenters or panelists although a representative from the UCS attended the first day. Presentations were given on SG programmatic issues, SG inspection oversight issues, SG inspection technical issues, and SG tube integrity technical issues. Several question and answer panel sessions were held in which questions from workshop attendees (including other members of the public) were solicited. The agenda, presentation handouts, and attendance list from the workshop have been added to ADAMS (Accession No. ML010600479) and a meeting summary will be issued in the near future.

Item No. 2.1 Evaluate the need for a new communication protocol with the US Secret Service that would cover emergency situations at all NRC licensed facilities

On December 5, 2000, members of the NRC staff, led by Frank Congel, Director, Incident Response Operations (IRO), met with representatives of the U.S. Secret Service (USSS) in Washington D.C.. The purpose of the meeting was to evaluate the need for a new communications protocol with the USSS that would cover emergency situations at all NRC licensed facilities. During the meeting, USSS agents discussed their need to have timely notice of radiological events anywhere in the US. Notification of USSS via the existing protocol between the NRC and the White House Situation Room (which principally serves the needs of the National Security Council (NSC)) was determined to be unsatisfactory, since the timeliness, and level of detailed information needed by USSS Field Teams, differ greatly from

the information needed by the NSC. At the conclusion of the meeting, it was agreed that NRC and USSS would establish a new communications protocol with the threshold for contact, the exact method of contact, the type, and specificity of information, to be determined in subsequent exchanges. The new communications protocol was subsequently documented in a letter from the NRC to the USSS dated February 15, 2001 (ADAMS Accession No. ML010460485).

Item No. 2.2 Establish NRC web site for Steam Generator Action Plan

On January 16, 2001, the SG Action Plan web page was published on the external NRC web site. The web page location is: <http://www.nrc.gov/NRC/REACTOR/SGAP/index.html>. The web page includes a general overview of the SG Action Plan as well as other information related to action plan activities (e.g., news and correspondence, meeting notices and summaries, reference documents, and general SG design information). The web page is periodically updated to include relevant publically-available documents that are added to ADAMS.

ATTACHMENTS

1. SG Action Plan Milestones
2. Revisions to the SG Action Plan
3. SG Action Plan Resource Estimates

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NAME	TCollins for GHolahan*	BBoger*	JZwolinski	
DATE	3/19/01	3/20/01	3/23/01	

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ATTACHMENT 1
STEAM GENERATOR ACTION PLAN MILESTONES

Item No. (TAC No.)	Milestone	Date (T=Target) (C=Complete)	Lead	Support
1.1 (MA9881)	Issue Regulatory Information Summary on SG Lessons Learned (TG: 8; page 2 of Ref. 2)	11/03/00 (C)	DE E. Murphy	
1.2 (MA4265)	Discuss steam generator action plan and IP2 lessons learned with industry and other external stakeholders (TG: 2a-2o, 3a, 3b, 4a, 4b , 4c, 8)	12/20/00 (C)	DE T. Sullivan R. Rothman	
1.3 (MB0258)	Subsequent to item 2, identify technical and management leads for each item and develop initial resource estimates	12/27/00 (C)	DLPM R. Ennis	DE K. Karwoski DIPM D. Coe
1.4 (MB0258)	Brief management on resource estimates and invoke PBPM process as appropriate	12/27/00 (C)	DLPM R. Ennis	DE K. Karwoski DIPM D. Coe
1.5 (MA5260)	Staff review of ACRS recommendations on DPO and develop detailed milestones and evaluate impact on other action plan milestones. Invoke PBPM process, as appropriate. (GSI-163 and DPO).	05/02/01 (T)	DLPM R. Ennis	DE S. Coffin E. Murphy DSSA S. Long RES J. Muscara
1.6 (MA7147)	Determine GSI-163 resolution strategy and revise steam generator action plan milestones, as appropriate (GSI-163)	04/30/01 (T)	DE E. Murphy	
1.7 (MB0553)	Determine need to incorporate new steam generator performance indicators into Reactor Oversight Process (page 2 of Ref. 2; TG: 5e, 5f)	01/24/01 (C)	DIPM D. Hickman	DE C. Khan E. Murphy DSSA S. Long
1.8 (MA4265)	Recommence work on NEI 97-06 (page 3 of Ref. 2; TG: 7)	01/31/01 (C)	DE E. Murphy	

ATTACHMENT 1
STEAM GENERATOR ACTION PLAN MILESTONES

Item No. (TAC No.)	Milestone	Date (T=Target) (C=Complete)	Lead	Support
1.9 (MB0553)	Review NRC inspection program and, if necessary, revise guidance to inspectors on overseeing facilities with known steam generator tube leakage. (Attachment 3 to Ref. 1)	03/30/01 (T)	DE L. Lund	DIPM S. Malur DSSA S. Long
1.10 (MB0576)	Reassess the NRC treatment of licensee steam generator inspection results summary reports and conference calls during outages. Evaluate need for review guidance. (Attachment 3 to Ref. 1; TG: 6c; page 4 and 5 (top and bottom) of Ref. 1)	03/30/01 (T)	DE S. Coffin	
1.11 (MB0553)	Review the NRC inspection program and, if necessary, revise guidance to inspectors on overseeing facility eddy current inspection of steam generators. This involves the following major substeps: a) review and revise the baseline inspection program. b) review and revise how inspection results/degraded conditions/events are assessed through a risk-informed process (e.g., SDP or CCDP) c) review and revise the training program for inspectors (Attachment 3 to Ref. 1; TG: 5a, 5b, 5c, 5d, 5f, 6c)	 04/30/01 (T) 07/31/01 (T) 09/28/01 (T)	 DE C. Khan DSSA S. Long DIPM S. Malur	 DIPM S. Malur DSSA S. Long DE C. Khan DIPM S. Malur DE C. Khan DSSA S. Long
1.12 (MB0576)	Determine need for formal written guidance for technical reviewers to utilize in performing steam generator tube integrity license amendment reviews (TG: 5c, 6a)	03/30/01 (T)	DE S. Coffin	
1.13 (MB0258)	Staff provides EDO with update on status of action plan (page 8 of Ref. 1)	05/31/01 (T)	DLPM R. Ennis	

ATTACHMENT 1
STEAM GENERATOR ACTION PLAN MILESTONES

Item No. (TAC No.)	Milestone	Date (T=Target) (C=Complete)	Lead	Support
1.14 (MA4265)	Staff completes review and draft safety evaluation of NEI 97-06 including addressing issues raised in OIG report and IP2 lessons learned report (NEI 97-06, TG: 2, 3, 4, 7)	05/31/01 (T)	DE E. Murphy	
1.15 (MB0631)	Hold steam generator workshop with stakeholders (page 2 of Ref. 1; page 2 of Ref. 2)	02/27/01 (C)	DE R. Rothman	
1.16 (MA4265)	Staff briefs CRGR on NEI 97-06 (NEI 97-06)	07/31/01 (T)	DE T. Sullivan E. Murphy	
1.17 (MA4265)	Publish SE on NEI 97-06 in FR for public comment (NEI 97-06)	07/31/01 (T)	DE R. Rothman	
1.18 (MA4265)	ACRS review of NEI 97-06 (NEI 97-06)	08/31/01 (T)	DE T. Sullivan E. Murphy	
1.19 (Later)	Issue generic communication related to steam generator operating experience and status of steam generator issues	09/28/01 (T)	DE S. Coffin	
1.20 (MA4265)	Staff briefs Commission on endorsing NEI 97-06 (NEI 97-06, and WITS Item 199400048)	10/31/01 (T)	DE T. Sullivan	
1.21 (MA4265)	Staff issues endorsement package on NEI 97-06 in a safety evaluation and includes the approval of the generic technical specification change in a Regulatory Issue Summary	10/31/01 (T)	DE R. Rothman	
2.1	Evaluate the need for a new communication protocol with the US Secret Service that would cover emergency situations at all NRC licensed facilities (Attachment 3 of Ref. 1)	12/05/00 (C)	IRO F. Congel	
2.2 (MB0258)	Establish NRC web site for Steam Generator Action Plan	01/16/01 (C)	DLPM R. Ennis	

ATTACHMENT 1
STEAM GENERATOR ACTION PLAN MILESTONES

Item No. (TAC No.)	Milestone	Date (T=Target) (C=Complete)	Lead	Support
2.3 (MB0258)	Review and revise, as appropriate, the policy for project manager involvement with the morning call between the resident inspectors and the region. (Attachments 3 and 4 of Ref. 1)	03/30/01 (T)	DLPM R. Ennis	
2.4 (MB0737)	Review program requirements for routine communications between the resident inspectors and local officials based on public interest. Based on weighing current resident inspector responsibilities (e.g., inspection requirements, following up on plant events) against this review, revise program requirements if needed. (Attachment 3 of Ref. 1)	03/30/01 (T)	DIPM T. D'Angelo	
2.5 (MB0737)	Develop, revise, and implement, as appropriate, a process for the timely dissemination of technical information to inspectors for inclusion in the inspection program (TG: 5g)	04/30/01 (T)	DIPM G. Klinger	
2.6 (MB0258)	Incorporate experience gained from the IP2 event and the SDP process into planned initiatives on risk communication and outreach to the public (TG: 9)	05/31/01 (T)	DE A. Smith	
2.7 (MB0258)	Investigate possibility of establishing protocol with OIG regarding review of draft reports for factual/contextual errors (page 8 of Ref. 1)	06/29/01 (T)	DLPM R. Ennis	
2.8 (MB0633)	Review and revise, as appropriate, the amendment review process, including concurrence responsibilities, supervisory oversight, and second-round requests for additional information. (Attachment 3 of Ref. 1; TG: 6b, 6d, 6e; page 6 of Ref. 1)	06/29/01 (T)	DLPM R. Ennis	

ATTACHMENT 2
REVISIONS TO THE STEAM GENERATOR ACTION PLAN

- 1) The "Item No." column has been revised to renumber the milestones. The new item numbers indicate the Attachment and Item Number for the respective milestone as shown in the SG Action Plan dated November 16, 2000. For example, new Item Number "1.3" pertains to Item 3 in Attachment 1 of the original action plan.
- 2) The "Item No." column has been revised to add the TAC Number(s) associated with each item.
- 3) Item No. 1.11 has been revised to break it down into Item Nos. 1.11a, 1.11b, and 1.11c. This change more accurately describes the substeps involved to complete this milestone.
- 4) Item No. 1.10 has been revised to delete Task Group (TG) recommendation 5d. Recommendation 5d has been added to Item No. 1.11. This recommendation pertains to factoring outage phone calls into the baseline inspection program. Changes to the baseline inspection program will be made in accordance with Item No. 1.11a. Note, although Item No. 1.10 specifically addresses outage phone calls, this item deals with changes to guidance for Headquarters staff.
- 5) Task Group recommendation 5f has been added to Item No. 1.11. This recommendation is also a reference for Item No. 1.7. Recommendation 5f pertains to performance indicators (PIs) and the significance determination process (SDP). Item No. 1.7 pertains to the PI portion of the recommendation and Item 1.11b pertains to the SDP portion of the recommendation.
- 6) Task Group recommendation 6c has been added to Item No. 1.11. This recommendation is also a reference for Item No. 1.10. Recommendation 6c pertains to the review of the licensee's SG tube examination reports. Item No. 1.10 pertains to guidance for Headquarters staff and Item 1.11b pertains to how the inspection results are assessed through a risk-informed process.
- 7) Task Group recommendation 5c has been added to Item No. 1.12. This recommendation is also a reference for Item No. 1.11. Recommendation 5c pertains to ensuring that SG expertise is available to support the licensing and inspection programs. Item No. 1.11c pertains to expertise related to the inspection program and Item No. 1.12 pertains to expertise related to the licensing program.
- 8) The milestone description for Item No. 1.21 has been revised to more accurately describe how NEI 97-06 will be endorsed.
- 9) The "Lead" column has been revised to indicate the lead individuals for each action plan item. In addition, a "Support" column has been added to indicate supporting staff for each item as applicable.

ATTACHMENT 2
REVISIONS TO THE STEAM GENERATOR ACTION PLAN

- 10) The "Date" column has been revised to add either "(T)" or "(C)" after each date in order to indicate if the date is a target date (i.e., "T") or actual completion date (i.e., "C"). In addition, some of the target completion dates have been revised based on available resources. Revision of these target dates does not change the overall completion of all of the action plan items by October 31, 2001, as originally forecast.

ATTACHMENT 3
STEAM GENERATOR ACTION PLAN RESOURCE ESTIMATES

1.0 SUMMARY

The following is a summary of the estimated resources to be utilized by NRR for the activities associated with the Steam Generator (SG) Action Plan in FY2001 (i.e., 10/1/00 - 9/30/01):

<u>Division</u>	<u>Estimated Hours</u>	<u>No. of FTE*</u>
DE	3800	2.6
DIPM	290	0.2
DLPM	620	0.4
DSSA	<u>1460</u>	<u>1.0</u>
Totals	6170	4.2

* Number of FTE based on (Estimated Hours)/(1460 hours per year)

2.0 ANALYSIS, ASSUMPTIONS & IMPACT

2.1 Division of Engineering (DE)

The resources required to resolve the DPO and the GSI are not in the estimates provided above. As required by SG Action Plan Item 1.5, following receipt of the ACRS/EDO recommendations, DE will need to evaluate the impact and factor this work into the action plan.

The DE budget for FY2001 assumed 2 FTE for work on steam generator issues (including completing review of NEI 97-06 and issuing the license change packages). As a result, DE needs an additional 0.6 FTE to complete the work identified in the action plan with the present schedule.

To accommodate the 0.6 FTE shortfall in the short-term, DE will defer work on the NUREG summarizing our review of GL 97-06 (SG Internals Degradation), reduce the number of steam generator inspection phone calls based on steam generator tube material and other factors (emphasizing those plants that are "high" risk), and defer work on GL 95-05 issues (POPCD, RPC to bobbin voltage conversion, database review, etc.). In the long-term, DE will need an additional FTE.

ATTACHMENT 3
STEAM GENERATOR ACTION PLAN RESOURCE ESTIMATES

2.2 Division of Inspection Program Management (DIPM)

Based on the number of FTE estimated above it has been concluded that, for DIPM, the “new work” identified by the SG Action Plan can be absorbed within the existing budget. There will be no need to shed or defer previously planned work and there will be no need for additional staffing.

2.3 Division of Licensing Project Management (DLPM)

Based on the number of FTE estimated above it has been concluded that, for DLPM, the “new work” identified by the SG Action Plan can be absorbed within the existing budget. There will be no need to shed or defer previously planned work and there will be no need for additional staffing.

2.4 Division of Systems Safety and Analysis (DSSA)

The 1.0 FTE estimated for DSSA is associated with ongoing work and remains unchanged. However, this estimate does not include resources required to resolve ACRS recommendations on the DPO. As required by the SG Action Plan Item 1.5, following receipt of the ACRS/EDO recommendations, DSSA will evaluate the impact.