

April 13, 2001

MEMORANDUM TO: William D. Travers
Executive Director for Operations

FROM: Annette Vietti-Cook, Secretary **/RA/**

SUBJECT: STAFF REQUIREMENTS - SECY-00-0225 - PROPOSED
RULEMAKING PLAN ON SUBMISSION OF FINANCIAL
INFORMATION FOR APPLICATIONS TO RENEW OR EXTEND
THE TERM OF AN OPERATING LICENSE FOR POWER
REACTORS (10 CFR PART 50.33(f)(2))

The Commission has approved the proposed rulemaking plan using Option 2 to modify 10 CFR § 50.33(f)(2) to remove the requirement that entities other than electric utilities submit financial qualifications information as part of the license renewal process.

In developing the statement of considerations for the proposed rule, the staff should clearly articulate the rationale for the rule change. This rationale should include a complete description of the existing regulatory processes to monitor and evaluate changes in financial qualifications for current licensees. It should also clearly identify the methods and bases for its review of a licensee's financial qualifications in the various circumstances in which a licensee may no longer meet the definition of an "electricity utility" under the NRC's regulatory framework. The staff should also discuss why it is retaining the requirement for financial qualifications information for nonpower reactors applying for license renewal.

The staff should assess its financial qualifications review guidance to ensure that this guidance adequately reflects that the NRC conducts financial qualifications reviews in cases where corporate restructuring results in a licensee transitioning from an "electric utility" to a non-"electric utility", but no license transfer occurs pursuant to 10 CFR §50.80.

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