



Strategic Training and Resource Sharing

STARS / IRAG

March 5, 2002

Meeting between STARS IRAG and NRC



STARS

- Strategic Teaming and Resource Sharing
- Alliance started February 2000
- Original members: AmerenUE, TXU Electric, Pacific Gas and Electric, STPNOC and Wolf Creek NOC
- Additional members: Arizona Public Service Co. joined in January 2002



IRAG

- Integrated Regulatory Affairs Group
- Team of Regulatory Affairs managers for each of the STARS members
- Worked together even before STARS organized
- Focused on more effectively and efficiently addressing regulatory issues



IRAG Activities

- STARS Projects
- Centers of Excellence (COEs)
- IRAG Projects
- Enhanced communications
- Strategic Regulatory Issues



IRAG - STARS Projects

- Control Room Habitability
- 50.59 Rule Implementation
- Common training on revised reporting requirements
- Common licensing processes
- Enhanced communications with industry



IRAG - COEs

- 10CFR50.59 Program
- Event reporting/operability evaluations
- License renewal
- Licensing Actions
- Risk informed initiatives
- Regulatory Oversight Process
- Regulatory Affairs Training



IRAG Projects

- Center of Business - Regulatory Affairs Strategic Issues Group (RASIG)
- IRAG organizational study
- Offsite Safety Committees
- Electronic Licensing Basis Documents (LBDs)
- Updated Technical Requirements Manuals (TRMs)



IRAG Enhanced Communications

- Weekly conference calls to address active licensing issues (rulemaking, etc.)
- Coordinated interface with industry organizations (NEI, WOG, EPRI, etc.)
- Quarterly meeting
- Joint meetings/interfaces with NRC
- Monthly Licensing Reports



IRAG Strategic Issues

- Reactor Vessel Head Cracking
- Security
- Worker Fatigue
- Risk Informed Regulatory Activity
- PWR Sumps



Common Licensing Actions

- Past Common Submittals
 - Bases Control Program(50.59 Rule) - TSTF-364
 - Risk Informed Inservice Inspection (ISI)
 - Elimination of PASS Requirements - TSTF-366



Common Licensing Actions

- Common LARs under review
 - Equipment Hatch Open during Fuel Movement
 - Missed Surveillances - TSTF-358
 - Definition of Positive Reactivity - TSTF-287
 - Low Power Calorimetric - TSTF-371
 - Expanded COLR and COLR References - TSTFs -339 & 363
 - Licensed Operator Qualifications - RIS 2001-01



Future LARs

- RIS 2001-21 responses by all members
- Potential Common Submittals
 - Mode restraints (potential CLIIP) - TSTF-359
 - Inoperable Snubbers - TSTF-372
 - NIS trips during physics testing - TSTF-315
 - Electrical Surveillance mode restrictions - TSTF-283
 - AC Electrical Completion Times - TSTF-417
 - DC Electrical Rewrite - TSTF-360



Other Future LARs

- Eliminate Response Time testing for certain SSPS components
- Increase surveillance interval for slave relays
- Increased surveillance interval for certain RPS components
- Relaxed Completion Times for Containment Isolation Valves
- Update License Conditions (e.g. reporting)



Standard Learning and Resource Program

STARS Saving on Common LARs re NRC Review Costs

<u>Common LAR</u>	<u>TXU</u>	<u>WC</u>	<u>CA</u>	<u>DC</u>	<u>STP</u>	<u>PV</u>	<u>STARS</u>	<u>Lead</u>
PASS								
NRC Cost		\$734.40	\$993.60	\$1152.00	\$450.00	\$1540.00	\$734.40	WCNOC
Saving Est.		0	(259.20)	(417.60)	284.40	NA	(\$392.40)	2001 savings
RI-ISI								
NRC Cost	\$34290.00	\$16985.40	\$9083.40	\$9374.40	\$1583.60		\$34,290.00	TXU
Saving Est.	0	\$17,304.60	\$25,206.60	\$24,915.60	\$32,706.40		\$100,133.20	2001 Savings 2002 Savings
Equipment Hatch								
NRC Cost		2078.40					2078.40	WCNOC
Saving Est.		0					0	
50.59 Rule								
NRC Cost	\$3,744.00	\$691.20	\$1,512.00	\$1,440.00	NA	\$2300.00	3744.00	TXU
Saving Est.	0	\$3,052.80	\$2,232.00	\$2,304.00	NA	NA	\$7,588.80	2001 Savings
Expanded COLR								
NRC Cost								WCNOC
Saving Est.								
Missed SRs								
NRC Cost								AmerenUE
Saving Est.								
LP Cal								
NRC Cost								AmerenUE
Saving Est.								
Pos Reactivity								
NRC Cost								AmerenUE
Saving Est.								

(Updated quarterly from NRR invoices)



Lessons Learned/ Open Discussion

- LAR Format
 - Use of NEI standard
- Parallel versus Staggered Submittals
- Degree of commonality
- Description of commonality
- Lead NRC Project Manager
- Same reviewer(s)



Areas for Improvement

- Open Discussion
 - STARS
 - NRC