

October 14, 2003

MEMORANDUM TO: James W. Andersen, Chief  
Performance Assessment Section  
Inspection Program Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

FROM: John W. Thompson, Senior Reactor Operations Engineer */RA/*  
Inspection Program Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

SUBJECT: PUBLIC MEETING SUMMARY ON THE MITIGATING SYSTEMS  
PERFORMANCE INDEX AND THE REACTOR OVERSIGHT  
PROCESS MONTHLY MEETING HELD ON SEPTEMBER 24-25, 2003

On September 24 and 25, 2003, a Mitigating Systems Performance Index (MSPI) and Reactor Oversight Process (ROP) public meeting was held at the One White Flint North Building, Room O7B4. Attachment 2 contains the agenda topics for the two day meeting listing the discussion on open and unresolved technical issues with the MSPI pilot program, updates on the status of proposed changes to the Operating Reactor Inspection Manual Chapter and Inspection Procedure changes, status of the draft significance determination process (SDP) appendix revisions, scrams with loss of normal heat removal performance indicator (PI) generic issue, and PI frequently asked questions.

During the September 24 meeting, meeting participants discussed the MSPI pilot program and status of open technical issues. Principle issues discussed were implementation issues, MSPI results with and without common cause factors, and MSPI milestones (Attachments 3, 4, and 5).

During the September 25 meeting, meeting participants discussed the Scrams w/LONHR PI generic issue and the staff gave a presentation on how the current indicator and performance thresholds were formulated (Attachment 7). After the presentation, industry representatives proposed to eliminate the Scrams w/LONHR PI altogether and work toward creating a suitable replacement PI. The staff maintained its desire to keep the current indicator. The remainder of the day was devoted to frequently asked questions (FAQs) on the PIs. The next combined meetings of the MSPI and ROP Working Groups is scheduled for October 22 and 23, 2003, respectively.

Attachments:  
As stated

MEMORANDUM TO: James W. Andersen, Chief  
Performance Assessment Section  
Inspection Program Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

FROM: John W. Thompson, Senior Reactor Operations Engineer  
Inspection Program Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

SUBJECT: PUBLIC MEETING SUMMARY ON THE MITIGATING SYSTEMS  
PERFORMANCE INDEX AND THE REACTOR OVERSIGHT  
PROCESS MONTHLY MEETING HELD ON SEPTEMBER 24-25, 2003

On September 24 and 25, 2003, a Mitigating Systems Performance Index (MSPI) and Reactor Oversight Process (ROP) public meeting was held at the One White Flint North Building, Room 07B4. Attachment 2 contains the agenda topics for the two day meeting listing the discussion on open and unresolved technical issues with the MSPI pilot program, updates on the status of proposed changes to the Operating Reactor Inspection Manual Chapter and Inspection Procedure changes, status of the draft significance determination process (SDP) appendix revisions, scrams with loss of normal heat removal performance indicator (PI) generic issue, and PI frequently asked questions.

During the September 24 meeting, meeting participants discussed the MSPI pilot program and status of open technical issues. Principle issues discussed were implementation issues, MSPI results with and without common cause factors, and MSPI milestones (Attachments 3, 4, and 5).

During the September 25 meeting, meeting participants discussed the Scrams w/LONHR PI generic issue and the staff gave a presentation on how the current indicator and performance thresholds were formulated (Attachment 7). After the presentation, industry representatives proposed to eliminate the Scrams w/LONHR PI altogether and work toward creating a suitable replacement PI. The staff maintained its desire to keep the current indicator. The remainder of the day was devoted to frequently asked questions (FAQs) on the PIs. The next combined meetings of the MSPI and ROP Working Groups is scheduled for October 22 and 23, 2003, respectively.

Attachments:  
As stated

DISTRIBUTION:  
IIPB r/f PUBLIC

**Accession Number: ML032870252 (Package)**  
**ML032870138 (Memo)**  
**ML032810642 (Attachments 6-9)**

OFFICE	DIPM/IIPB
NAME	JWThompson
DATE	10/14/03

OFFICIAL RECORD COPY

**ATTENDANCE LIST**  
**INDUSTRY/STAFF MSPI PUBLIC MEETING**  
September 23, 2003

	<b>NAME</b>	<b>AFFILIATION</b>
1.	John Thompson	NRC
2.	Dave Wrona	NRC
3.	Stuart Richards	NRC
4.	Rick Rassmussen	NRC
6.	Mark Caruso	NRC
7.	Patrick Baranowsky	NRC
8.	Donald Dube	NRC
9.	Bruce Mrowca	ISL
10.	Donald Hickman	NRC
11.	Rick Thomas	Entergy
12.	Eugene Cobey	NRC
13.	Thomas C. Houghton	NEI
14.	Tony Pietrangelo	NEI
15.	Bill Muokhoek	STP
16.	Jim Hout	PGN
17.	Daniel Marks	APS
18.	Don Olson	Dominion
19.	Gary Gilbert	Duke Energy
20.	John Tripoli	PPL Susquahanna
21.	Mike Strait	Exelon
22.	Gary Welsh	INPO
23.	Gerry Sowers	APS
24.	Jorle Ramirez	DTE/BWOG
25.	Kerry Landis	NRC
26.	Victoria Warren	Erin Engineering
27.	Leonard Sueper	NMC
28.	Sam Chien	SCE
29.	Robin Ritzman	PSEG
30.	Walt Rogers	NRC

**ATTENDANCE LIST**  
**INDUSTRY/STAFF ROP PUBLIC MEETING**

September 24, 2003

	<b>NAME</b>	<b>AFFILIATION</b>
1.	John Thompson	NRC
2.	Dave Wrona	NRC
3.	Stuart Richards	NRC
4.	Dale Ambler	Exelon
5.	Leonard Sueper	NMC
6.	Duane Kanitz	APZ
7.	Peter Koltay	NRC
8.	Steve Long	NRC
9.	Robert Kahler	NRC
10.	Donald Hickman	NRC
11.	Rick Thomas	Entergy
12.	Thomas C. Houghton	NEI
13.	Tony Pietrangelo	NEI
14.	Bill Muokhoek	STP
15.	Don Olson	Dominion
16.	Gary Welsh	INPO
17.	Doug Coe	NRC
18.	Dave Allsopp	NRC
19.	Ken Heffner	Progress Energy

# MSPI WORKING GROUP PUBLIC MEETING AGENDA

September 24, 2003  
OWFN 7B4

9:00-9:15 a.m.	Introductions	(NRC staff/Industry)
9:15-9:30 a.m.	High Level Staff Overview Status of Industry's Position on Technical Issues List of Ongoing Open Issues	(All) (Industry) (Staff)
9:30-10:00 a.m.	Status of Ongoing Research Results and Open Technical Issues	(Don Dube, RES)
10:00-10:15 a.m.	Public Discussion & Break	
10:15-12:00 p.m.	Status of Ongoing Research Results and Open Technical Issues	(Don Dube, RES)
12:00-1:00 p.m.	Lunch	
1:00 - 2:30 p.m.	MSPI Implementation Issues	(All)
2:30 - 2:45 p.m.	Public Discussion & Break	
2:45 - 3:30 p.m.	Discussion of RIS 02-014 Success Criteria	(All)
3:30 - 4:00 p.m.	Tentative Schedules and Future Milestones	(All)
4:00 p.m.	Adjourn	

## **ROP MONTHLY WORKING GROUP MEETING AGENDA**

OWFN 07B4  
September 25, 2003

09:00 a.m.	Welcome and Introduction
09:05 a.m.	General discussion on ROP inspection processes, improvements and initiatives, and radiological practices and events trends
09:45 a.m.	Discussion on Updates to Proposed SDP Changes
10:15 a.m.	Public Discussion & Break
10:30 a.m.	Update on the Industry Trends Initiating Events PI
11:00 a.m.	Discussion of FAQs and Generic Concerns with Scrams w/LONHR PI
12:00 p.m.	Break for Lunch
1:00 p.m.	Continue Discussion of Scrams w/LONHR
2:15 p.m.	Public Discussion & Break
2:30 p.m.	Discussion of other FAQs
4:00 p.m.	Adjourn

**MSPI IMPLEMENTATION ISSUES**

<b>I. MITIGATING SYSTEMS PERFORMANCE INDEX (MSPI)/INSPECTION PROGRAM IMPLEMENTATION ISSUES</b>	<b>SIGNIFICANCE OF ISSUE ADDITIONAL COMMENTS</b>

WHAT SHOULD THE MSPI INITIAL IMPLEMENTATION TEMPORARY INSTRUCTION (TI) INCLUDE? WHAT SHOULD PERFORMANCE INDICATOR (PI) VERIFICATION INSPECTION (ANNUAL) COVER?

SSU data collection information:

Constants calculated one time only (for 1999-2001 - total train unavailability, fault exposure hours, unplanned unavailable hours, online overhaul and other planned unavailable hours excluded in the Safety System Unavailability (SSU) PI, planned unavailable hours for functions monitored in MSPI but not in SSU, unavailable hours when the reactor was not critical, support system unavailable hours that were cascaded to the front-line systems; train specific critical hours for 1999-2001; component specific risk significant mission time)

MSPI data collection information:

Constants recalculated as necessary (plant specific internal events at power core damage frequency (CDF), train specific boundaries, train specific fussell-vesely (F-V) for unavailability (UA), plant specific PRA value of unavailability for the train, component specific F-V value for unreliability (UR), plant specific PRA value of component unreliability, front stops, back stops, success criteria)

Performance data collected quarterly (train specific unavailable hours, component specific failures to start, component specific start demands, component specific EDG failures to load, component specific EDG load demands, component specific failures to run, component specific run demands)



<p>WHO IS CAPABLE OF VERIFYING THE ITEMS IDENTIFIED IN ITEM 1 ABOVE?</p>	
<p>WHAT ROLE SHOULD THE SENIOR REACTOR ANALYST (SRAs) PLAY IN INSPECTION OF MSPI?</p> <p>Should SRAs have oversight/inspection responsibility for the risk-informed aspects of MSPI? Should they assess whether the appropriate F-V values have been used in MSPI? Should the SRAs evaluate whether the licensee used appropriate PRA success criteria for MSPI? Should SRAs review PRA revisions that cause any F-V value that is used in MSPI to change?</p> <p>If the SRAs should not be assigned to do any of the above, who is the responsible group within NRC to do such inspections/evaluations?</p> <p>What is the resource impact of using the SRAs to perform PRA-related reviews of MSPI?</p> <p>Are current budgeted resources adequate to allow the regional SRAs to perform MSPI baseline inspections and/or periodic audits?</p>	
<p>WHAT ROLE SHOULD THE REGIONAL RESIDENT INSPECTORS (SRI/RI) PLAY IN INSPECTION OF MSPI?</p> <p>Should SRI/RIs perform the bulk of the PI Verification Inspection Procedure (IP) for MSPI?</p> <p>Should residents inspect data reporting accuracy, audit of the number of component failures and unavailability data for the systems monitored by MSPI?</p> <p>If not, what is their appropriate role in inspection of MSPI?</p>	

<p>WHAT ROLE SHOULD HEADQUARTERS RISK ANALYSTS HAVE IN MSPI INSPECTION?</p> <p>Should Headquarters SRAs and risk analysts perform the more detailed evaluations of a licensee's use of PRA information in MSPI?</p> <p>What other role should Headquarters analysts have in MSPI?</p> <p>What is the resource impact of using headquarters personnel?</p>	
<p>LEVEL OF EFFORT AND RESOURCE UTILIZATION IN MSPI BASELINE INSPECTION</p> <p>What is the estimated level of resources required to implement MSPI?</p> <p>What is the estimated level of resources required to maintain MSPI after full implementation?</p> <p>Is the level or resource utilization more or less than for the current SSU PI and expenditure of Significance Determination Process (SDP) evaluations for areas covered by the PI?</p>	
<p><b>II. REPORTING AND DATA COLLECTION ISSUES</b></p>	<p><b>SIGNIFICANCE OF ISSUE ADDITIONAL COMMENTS</b></p>
<p>INDUSTRY BURDEN ON MSPI DATA COLLECTION</p> <p>Industry believes that the data collection burden is roughly the same as it is now for the SSU PIs. This is because the failure and unavailability data are already being collected for various industry data bases. With INPO's Nov '03 launch of Consolidated Data Entry (CDE) 2.0, will data collection efficiency increase?</p> <p>Is there a burden issue because licensees under MSPI will keep track UA and UR for 30-50 components? What impact will this have on Maintenance Rule tracking, thresholds, action levels?</p>	

<p><b>NRC BURDEN WITH MSPI DATA</b></p> <p>Is there any increase in staff burden on manipulation of PI data between current SSU PI and MSPI for posting to the web, analyses, etc? What data will be submitted, will it only be the MSPI indices of UAI and URI? This potential burden is not because of what is reported (which may only be two numbers), but what needs to be assessed during PI verification.</p> <p>Any other staff burden issues?</p>	
<p><b>WHAT ARE THE ISSUES ASSOCIATED WITH EPIX, CDE 2.0 AND TRANSMITTAL OF DATA?</b></p> <p>Staff can get access to EPIX data by requesting it from INPO. This process allows INPO to share industry data with the NRC. Are there any 10 CFR 50.9 issues with this arrangement?</p> <p>Does CDE 2.0 meet Government standards for records retention?</p> <p>How will the staff handle FOIA requests concerning MSPI? What data would be made available to the requester?</p> <p>What are the implications from this arrangement? Who is submitting PI data to the NRC and how is it being accomplished?</p>	
<p>What should be displayed on the NRC web page and in what format? Is it appropriate to display negative MSPI values?</p>	

<p>What are the requirements or guidelines necessary to ensure that the MSPI spreadsheets and how the data is collected, compiled, and tabulated in done in a manner that best suits the needs of the NRC and industry?</p> <p>What quality controls need to be established on data entry?</p> <p>How should verification of calculated values (e.g., F-V values) be done?</p>	
--	--

III. MSPI PRA-RELATED IMPLEMENTATION ISSUES	SIGNIFICANCE OF ISSUE ADDITIONAL COMMENTS
<p>INSENSITIVE PIs</p> <p>For insensitive systems, the ability to monitor incremental changes in performance is a factor of deterministically-set performance thresholds for unreliability (i.e., demand failures). There is no proposed backstop for unavailability. Current estimates (without consideration of common-cause contributions) predict somewhere between 10to 20 percent of monitored MSPI systems may have one or more components that are insensitive. From an efficiency and effectiveness point-of-view, do these systems add value to the MSPI? Should another approach be pursued that would consider selecting systems based on risk?</p> <p>Would there be any need to monitor UA for insensitive systems, since the MSPI would for all practical purposes, never change color based on UA input?</p> <p>Inspectors have no incentive to inspect insensitive systems because of the perception that the PI will always remain green and that any non-conformances will have little impact on the ROP. What is the impact of this perception?</p> <p>What are the disadvantages to selecting the MSPI monitored systems using the highest risk-worth systems?</p>	

<p>INVALID PIs (RISK SENSITIVE)</p> <p>For risk sensitive PIs, there may be no incentive for licensees to update PRAs or to have detailed modeling of support systems and other plant effects. What is the impact of this perception?</p> <p>For invalid PIs, a single failure could actually be greater than 1E-6 CDF, but still remain green. Given one failure, what are the ramifications of this assessment on inspectors and the baseline inspection program?</p>	
<p>PRA UPDATES</p> <p>PRA updates can impact CDF and F-V values used in MSPI, so what should be the appropriate level of PRA review by inspectors of these updates?</p> <p>Do we limit the number of times a licensee can change PRA information in the MSPI or do we allow licensees to change the F-V values anytime they update their PRA?</p> <p>How do we limit MSPI changes (e.g., 1, 2 or 4 per year)?</p> <p>Or, no change unless FV and/or CDF changes by 25%? (see #4 below)</p>	
<p>FUSSELL-VESELY IMPORTANCE MEASURES</p> <p>Are F-V importance measures accurate/complete enough to support a reliance on MSPI?</p> <p>Should we adopt a no change rule to F-V coefficients unless PRA cutsets that contain that component change by more than 25%?</p> <p>What should the staff do for those plants where the staff has concerns with PRA accuracy?</p>	

<p>CIRCUMSTANCES THAT MAY REQUIRE SDP TO BE PERFORMED</p> <p>MSPI includes risk contributions from PRA cut sets that only considered internal events. External events that impact the monitored component may still need an SDP to assess its impact on CDF. What is the importance if this issue?</p>	
<p><b>IV. ROP ASSESSMENT ISSUES</b></p>	<p><b>SIGNIFICANCE OF ISSUE ADDITIONAL COMMENTS</b></p>
<p>1. WHAT IS THE IMPLICATION OF NO SDP ON ENFORCEMENT SIGNIFICANCE?</p> <p>One conditional prerequisite of the MSPI is that the SDP would not be performed for those 5 to 7 active components in each system monitored by the MSPI (with some exceptions). Currently, inspection finding significance is generally determined by the SDP and findings that are greater than green go through a SERP and a possible regulatory conference. MSPI implementation would result in determination of inspection finding significance through MSPI, as such, the need for the SERP and/or regulatory conference may be unnecessary (unless there is a desire or need to discuss the validity of the performance deficiency). The practical impact of all of this is that the color of the PI will determine significance characterization of the finding as well as the enforcement significance, absent of course, traditional enforcement issues/concerns.</p>	

<p>PI - ROP ACTION MATRIX ASSESSMENT ISSUES</p> <p>What happens if a MSPI system is white and more performance issues are identified (would each of these additional issues be colored as white)</p> <p>(Each would be white (and be an NOV if a violation); no need for discussion of significance in a regulatory enforcement conference since there would be no discussion on significance (color) of finding.)</p> <p>OE may need to change enforcement policy to recognize MSPI used to determine significance of some inspection findings.</p> <p>If an SDP is performed for a common cause or multiple failure event involving an MSPI monitored component, the event could trigger a white inspection finding as well as a white MSPI. What are the implications from this scenario?</p>	
<p>MSPI PERFORMANCE ISSUE DOCUMENTATION</p> <p>How will inspectors document performance deficiencies that are going to obtain their color from the MSPI? Will they have to wait till the end of the quarter when MSPI data is submitted because there is no official document delineating the PI color until the PI data is submitted?</p> <p>Wait till MSPI data is submitted. If MSPI-monitored system crosses a performance threshold, the finding would be colored. Supplemental inspections would be done (based on MSPI results).</p>	



V. MAINTAIN SAFETY	SIGNIFICANCE OF CONSEQUENCE
<p>1. The current ROP uses both an SSU PI and the SDP (inspection findings) to characterize licensee performance for the monitored system for single failures or unavailability. The more conservative value is entered into the action matrix. MSPI would replace the current process to be the sole input into the action matrix for same performance issues. Does this maintain safety?</p> <p>2. Because of the use of risk informed methods, some systems under MSPI will not likely ever indicate non-green, even though an adverse performance trend could be detected. Unavailability may no longer be of practical monitoring value in these systems. Yet, low risk may indicate performance issues are of less concern. Does this approach maintain safety?</p> <p>3. Because of the use of risk-informed methods, some systems under MSPI are risk-sensitive, yet for a single failure, their risk assessment would be less conservative than under the current ROP using the SDP process. Additionally, the risk-significance of the first failure within an "invalid" system would be intentionally reduced. Does this approach maintain safety?</p>	

VI. INCREASE PUBLIC CONFIDENCE	SIGNIFICANCE OF CONSEQUENCE
<p>1. Raw data used by MSPI is not publicly available (EPIX/CDE 2.0 and PRA). Only two MSPI indices will be available on the NRC PI web. Does this change in the amount of available information from the SSU PI to the MSPI increase or decrease public confidence?</p> <p>2. How is public to know if F-V values are accurate since the NRC has no requirements on PRA use and compilation? Are SPAR results adequate to make this comparison?</p> <p>3. The construct of the MSPI could allow the use of negative numbers for plant performance that is better than industry baseline data. Would the use of negative values diminish public confidence?</p> <p>4. Negative UA contributions may offset a declining trend with unreliability values. What are the implications from this effect?</p> <p>5. Is MSPI too complex for a majority of stakeholders?</p> <p>6. SECY-00-0049 (dated 2/24/2000) states that the staff will continue to improve the PIs to: 1) provide more meaningful data, thus enhancing NRC effectiveness and efficiency as well as public confidence, and 2) will be easier to understand and simpler to implement, thereby reducing unnecessary regulatory burden, while continuing to maintain safety. Yet, UCS states in their August 22, 2003 letter that MSPI has a heavy reliance on plant PRAs, which information is not available to the public and of questionable quality (or accuracy), thus UCS perceives this change as a decrease in public confidence and less effective. Does the complexity and lack of publically available information on MSPI impede the public's ability to understand MSPI?</p>	

VII. INCREASE EFFICIENCY AND EFFECTIVENESS	SIGNIFICANCE OF CONSEQUENCE
<p>1.) MSPI will monitor somewhere between 30-50 individual components/unit. Under MSPI, the support cooling water system(s) are monitored MSPI systems. MSPI will be the sole significance input into the action matrix for single failures. Yet SDP may still be performed under certain scenarios (e.g., external event significance associated w/single failures). Some SDPs performed currently would no longer be performed under MSPI. Hours the staff may spend to complete the baseline inspection may increase under MSPI. The best estimate of assessing impact on the FAQ process is that the resources needed may either remain constant or increase due to complexity of MSPI and other concerns when performance is determined to be approaching threshold values. Given the above, what is the estimate of efficiency and effectiveness of MSPI?</p> <p>2.) If the industry does not include common cause risk contributions in MSPI, then the number of non-green findings will be under prediction (non-conservative). Including common cause will likely increase the number of invalid systems and with a small increase in the number of expected non-green findings. What is the estimate of efficiency and effectiveness of including/excluding common cause within MSPI?</p> <p>3.) The statements in SECY-00-0049 (as outlined above in VI. above) informs the Commission that the staff will continue to revise and work on PIs such that they will: 1) provide more meaningful data, thus enhancing NRC effectiveness and efficiency as well as public confidence. Does MSPI meet these commitments?</p>	

VIII. REDUCE UNNECESSARY REGULATORY BURDEN	SIGNIFICANCE OF CONSEQUENCE
<p>1. MSPI's regulatory burden may consist of PI verification inspection hours, time spent performing SDPs, resources spent on resolving FAQs and internal feedback forms, and performing supplemental inspections for non-green performance due to MSPI output. What is the estimate whether MSPI will increase or decrease unnecessary regulatory burden?</p> <p>2. Some staff-licensee interaction may be reduced the significance of the color is not subject to a regulatory conference. However, the need to hold a regulatory conference may still be warranted if a determination of the validity of a proposed violation needs to be determined. What is the estimate of the change in unnecessary regulatory burden with regard to the lack of ability of the industry to discuss significance of MPSI findings?</p> <p>3. What is the estimated overall staff regulatory burden with/without MSPI?</p>	

UNINTENDED CONSEQUENCES	SIGNIFICANCE OF CONSEQUENCE
1. Licensees with higher CDFs have higher MSPI results, providing disincentive to include more in PRA models.	high/med/low
2. If there is an actual CCF or an issue where multiple systems are affected (MSPI is not to be used), should the unavailability or failures of monitored systems be included in the MSPI data?	high/med/low
3. Could industry manage the MSPI through UR by increasing the number of demands when the observed failure rate increases?	high/med/low
4. Could industry manage UA by deferring planned maintenance if they are close to a threshold?	high/med/low

UNINTENDED CONSEQUENCES	SIGNIFICANCE OF CONSEQUENCE
5. Could industry change maintenance practices and actually do less on "insensitive" systems, since they could absorb many failures and a lot of unavailability?	high/med/low
6. Currently errors in PI reporting that affect crossing a threshold are reported via mid-quarter corrections and only affect the PI. With MSPI, errors that affect the PI threshold will also have an impact on past inspection findings (previous green violations characterized as NCVs would now be white and should be an NOV).	high/med/low
7. For multiple or common-cause events involving the monitored systems, it may be possible to have two non-green inputs into the action matrix. The UA and/or a demand failure would be counted for MSPI, and the SDP would be performed for the common-cause or multi-failure event. Depending on where licensee performance was prior to the discovered event/condition, the MSPI may have a non-green output.	high/med/low
8. The use of the constrained non-informed prior (CNIP) causes indicated trends to perhaps respond slower than actual plant specific data would. Will MSPI respond in an acceptable manner for use in the ROP?	high/med/low
9. Output of MSPI is a specific number. Is there confidence that this number is accurate enough to use in the ROP (i.e., typically risk values have a confidence band).	high/med/low

## MSPI MILESTONES

Fall 03	RESOLVE TECHNICAL AND PROCESS ISSUES
Fall 03	IDENTIFY ALL MSPI IMPLEMENTATION ISSUES
Late 03	COMPLETE FIRST DRAFT OF NEI 99-02 AND APPENDIX F
TBD	EVALUATION AND ASSESSMENT OF ALL IMPLEMENTATION ISSUES
TBD	GO/NO GO DECISION
TBD	FINAL DRAFT OF NEI 99-02 AND APPENDIX F GUIDANCE DOCUMENTS FIRST LICENSEE-CONDUCTED WORKSHOP TO IDENTIFY MSPI COMPONENTS, BOUNDARIES, ETC.
TBD	NRC-CONDUCTED PUBLIC WORKSHOP
TBD	FINALIZE NEI 99-02 AND APPENDIX F GUIDANCE DOCUMENTS PERFORM NRC TEMPORARY INSTRUCTION FOR MSPI SECOND LICENSEE-CONDUCTED WORKSHOP
TBD	THIRD INDUSTRY WORKSHOP (FAQ DISCUSSIONS)
TBD	FINAL STAKEHOLDER PUBLIC MEETING RIS COMMUNICATING MSPI IMPLEMENTATION INTO ROP
TBD	IMPLEMENTATION OF MSPI