

DSI-11

From: David Wigginton
To: TWD1.TWP5.SECY
Date: 11/4/96 11:57am
Subject: STRATEGIC ASSESSNEBT COMMENTS

(9)

As a licensing project manager in NRR, I am grateful to be able to submit comments on the Assessment. These comments come from a number of individuals in the NRC and industry that have participated in the current licensing basis efforts and in the efforts to clearly define the place for computers in our business.

I would be glad to discuss them.

Thank you.



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COMMENTS ON STRATEGIC ASSESSMENT

SUMMARY

DSI 11. OPERATING REACTOR PROGRAM

The strategic assessment should include a discussion on process/safety improvements in utilization of information technology (IT) for computer aided search of docketed information for retrieval of the current licensing basis (CLB) for licensing and inspection. NRR/industry efforts for the past three years and recent inspections at Millstone and Maine Yankee support this recommendation. Interim actions to establish searchable files for select document types is necessary and achievable with minimum expenditure of resources or funds. This paper addresses the three areas of concern; access to CLB data files, clarification of CLB issues, and interim measures pending the establishment of accessible CLB files.

The greatest change into the next century for licensing and inspection may come from the NRC and licensees taking advantage of information technology advancements which can reduce time and resource requirements while improving safety for both licensing and inspection activities. Electronic information exchange (EIE) offers the advantages of immediate submittal in a form that can populate agency data bases or records systems; DSI 11 addresses EIE in option 2.A.2.c. While EIE offers the advantages of immediate submittal in a form that can populate agency data bases or records systems, a more complete utilization of IT advances, such as the use of wide area networks and distributed record systems, offers immediate access to the NRC and public and greatly reduced costs to the industry.

Attention now to the processes surrounding access to the CLB and to information technology advances would greatly enhance our current attention to safety. The establishment of such processes would aid future licensees with paperless license applications, reviews, and approvals.

SPECIFIC RECOMMENDATIONS

- 1) Lessons learned from the recent inspections at Millstone and Maine Yankee confirm the efficiency and accuracy of assimilating the CLB from computerized docket files. The agency processes for licensing and inspection must focus on the CLB and the licensee's approved method of meeting the regulations. The use of computer aided search and retrieval systems was vital to the efficiency and accuracy by which the NRC determined the shortcomings with those facilities. However, the agency must now rely on paper files and manual searches to accomplish licensing and inspection functions or upon the abilities of the licensees that we are attempting to regulate.

Licensees are required by regulation to maintain "record" files for site information. Maintenance and archival requirements parallel to some degree those set for federal records but are not required or necessary to be the same. Many have established computer systems for these records and have extended the systems to include docketed information; that which contains the CLB. A distributed network of these record files, and the proposed ADAMS data base for licensees without computer based docket files, would provide the overall industry/NRC system at the least cost and time to establish. The associated problems with open access for the NRC and public, control

and authenticity of the files, and security are all state-of-the-art for IT. (Additional suggestion for such a network system are attached for initial consideration.)

Assimilation of the CLB using access to computer record systems will change the strategic planning by allowing improved efficiencies and accuracies to supplement the loss of resources from other decision makers such as the Commission, Congress, and the President. Assimilation of the CLB from access to computer record systems will directly improve safety by the speed of recall and accuracy of information. However, the definition of CLB and related problems must also receive attention.

- 2) SECY-92-314 dated September 10, 1992, on the subject of "CURRENT LICENSING BASIS FOR OPERATING PLANTS" provided a then current set of recommendations on this issue. Those recommendations should be revised and updated to provide a framework for resolving the continuing questions surrounding CLB; some of which are included in the attachments to the SECY paper.
- 3) Taking full advantage of IT advances and establishing a WAN will take time. Interim steps should be taken to put all key NRC references in a searchable form either on CDs or on-line and make them available to the NRC staff and licensees. Computerized links between documents should be established with the thought of these documents being included eventually in the ADAMS data system. Documents in this category include the Standard Review Plan(s), Chapter 1 of the Code of Federal Regulations, Inspection Manual, and future Regulatory Guides. Note that the CFR may already be available from the Library of Congress.

As part of the interim processes, licensees should be encouraged to submit the FSAR and Technical Specifications on CD or other electronic form. At the establishment of the WAN, these documents can be replaced with working copies and for the FSAR, the update at each refueling can be dropped. The replacement of paper updates for the FSAR represents a considerable cost savings for many licensees and would allow NRC staff improved search capability.

ATTACHMENT

INITIAL CONSIDERATIONS

REGULATED DISTRIBUTED LICENSING SYSTEM

1. Establish an NRC position that ADAMS data files will be established for docketed information for licensees and the cost for each licensee will be included in the fee for that licensee. A suitable alternative with sizable cost savings for the licensee would be the establishment of the regulated distributed licensing system (RDLS). RDLS concept is a network of "record" quality files of docketed information which would be controlled by regulation and open to the NRC and public. ADAMS would be one of the "distributed" files. The RDLS concept is contingent upon the following.
2. Establish a regulation to allow licensee files to substitute for ADAMS files if:
 - a. The files are accessible 24 hours a day through a Wide Area Network.
 - b. The files are "regulated" for authenticity, control, and access.
 - c. The files are maintained up-to-date by the licensee.
 - d. The files are in a format/language that is searchable by production software.
 - e. The files would meet archival requirements suitable to the NRC and much like the requirements for site records.
3. Establish a Wide Area Network (WAN) for the NRC and licensees that:
 - a. Is open only to the NRC and licensees. Public access remains through the NRC via the Public Document Room and Local Public Document Rooms. INTERNET access would be via the WWW NRC connection.
 - b. Provides two levels of security; the first is through the NRC access port and the second is at the licensees Web site on the WAN.
 - c. Access is limited to read or download only.
 - d. Search and retrieval for the NRC and Public is controlled at the NRC port.
4. Establish computer aided inspection techniques of licensee's computer files to assure authenticity, accuracy, and availability. Inspection can be performed from the NRC access point.
5. Modify other regulations to allow licensee on-line files in lieu of paper submittals, such as 50.71e FSAR updates. On-line working files of the FSAR would provide real time accuracy of the information used by the NRC for safety decisions. Other on-line files might include:
 - a. Inservice Testing Manuals
 - b. Inservice Inspection Manuals
 - c. Quality Assurance Manuals
 - e. P&IDs (CAD levels equal to CLB information)
 - f. 50.59 Evaluations
 - g. Commitment Tracking Systems (at the CLB level)
 - h. Others