

NEI 99-01 Revision 7 Licensing Applications

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Introduction:

- Purpose: The purpose of the meeting is to provide an overview of the requirements, processes and lessons learned for applicants submitting amendment requests for emergency action level scheme changes.
- Outcome: The NRC expects that applicants will have a better understanding of the requirements, process and some of the lessons learned for applicants transitioning emergency action level schemes from NEI 99-01 Revision 6 to Revision 7.

Overview:

- Regulatory requirements and guidance
- Review process
- Tools NRC staff will be using
- Lessons Learned/Recommendations

Regulatory requirements and guidance:

- Regulatory requirements
 - Regulations 10 CFR 50.47 and Appendix E to Part 50
- Regulatory Guidance
 - Regulatory Issue Summary 2003-18
- Industry Guidance:
 - NEI 99-01, Rev. 7

Review Process:

- **Pre-application meeting:** Highly encouraged especially if expanding scope or due to unique EALs
- **Application Acceptance:** Applications must contain the information needed to conduct the review.
- **Staff Review:** Timeline for staff review begins once the application is accepted.
- **Requests for Additional Information:**
 - NRC staff will request additional information if needed to support the review.
 - Applicants can request clarification calls to ensure clear understanding of the requests for additional information.
 - An audit process is an option to consider.
- **License Amendment Issued:** The NRC issues a license amendment, and the safety evaluation report documents the NRC staff review.

Tools NRC staff will be using:

- Staff will utilize the regulations and guidance documents to conduct the EAL reviews.
 - Regulations 10 CFR 50.47 and Appendix E to Part 50
 - NEI 99-01, Rev. 7 (currently under endorsement)
- Specific topics will be discussed by staff during pre-application meetings based on lessons learned from previous LARs.
- NRC staff will use a draft internal checklist derived from NEI 99-01 Rev. 7 change summary document to assist staff with the review.
- NRC staff will use a draft safety evaluation template to assist NRC staff in efficient documentation of application reviews.

Lessons Learned for more efficient reviews

1. A redline strike-out of the proposed EAL scheme as compared to the NEI 99-01 Rev. 7.
2. A clean version of proposed EAL basis document.
3. Calculations specific to EALs (calculations using a ODCM or Technical Specification value as a basis are not needed).
4. Wall Board (to check layout and logic).
5. Difference/Deviation Matrix (with basis/justification).
6. A statement that confirms the proposed changes were discussed with State and county officials.

Lessons Learned Cont'd:

- NRC Staff recommends that applicants review:
 - Regulatory Issue Summary 2003-18 and supplements.
- Common requests for additional information in past EAL reviews:
 - The application should provide a statement that the EAL setpoints are within the calibration ranges and resolution for the instrumentation used.
 - NRC staff expects that the basis document changes will be evaluated in accordance with the provisions of 10 CFR 50.54(q).
 - Other RAI's have been related to the changes in threshold values of plant instrumentation. If changes are being proposed, please ensure that the documentation is provided.

Summary:

- Pre-application meetings are encouraged
- NRC is developing tools for staff to improve review efficiency
- Applicants should review Regulatory Issue Summary 2003-18 to ensure submissions are complete to reduce the need for requests for additional information.
- NRC Licensing PM is available if you have any questions or need to schedule a clarification call.

Questions?