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## 10 CFR Part 50

### Integrated Schedules; Policy Statement

**AGENCY:** Nuclear Regulatory Commission.

**ACTION:** Final policy statement on integrated schedules.

**SUMMARY:** The Nuclear Regulatory Commission (NRC) is publishing its Final Policy Statement on Integrated Schedules. This policy statement describes the policy the Commission intends to use to promote voluntary implementation of licensee integrated schedules for regulatory requirements and other activities at nuclear power plants. The primary focus of the policy addresses the way licensees may establish realistic integrated schedules and the ways the Commission intends to interact with these licensees. It also documents the Commission's support for the establishment of integrated schedules at each nuclear power plant. Integrated schedules for plant modifications and activities will permit the NRC, the nuclear industry, and the public to focus on safety issues while forecasting and maintaining long-term schedules and will permit more effective use of licensee resources to implement these plant changes and NRC resources to review them.

**EFFECTIVE DATE:** November 23, 1992.

**FOR FURTHER INFORMATION, CONTACT:** Claudia M. Abbate, Policy Development and Technical Support Branch, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, DC 20555; Telephone (301) 504-1281.

#### SUPPLEMENTARY INFORMATION:

##### Background

On November 27, 1987, the "Proposed Policy Statement on Integrated Schedules for Implementation of Plant Modifications" was published in the Federal Register (52 FR 45345). The proposed policy statement described the policy the Commission intended to use to promote the development of voluntary integrated schedules for implementing regulatory requirements and other improvements in nuclear power plants. The comment period ended on January 25, 1988. The staff received and evaluated 19 sets of comments. Seven facilities implemented the proposed policy on integrated schedules.

On December 27, 1990, the NRC requested comments on SECY-90-347, "Regulatory Impact Survey Report," in the Federal Register (55 FR 53220). SECY-90-347 included a discussion of the proposed integrated regulatory requirements implementation schedule (IRRIS) concept. The staff developed IRRIS to better manage the impact on licensees of implementing generic requirements. During the 30-day comment period, the NRC received and evaluated 22 sets of comments that addressed IRRIS.

On June 7, 1991, SECY-91-172, "Regulatory Impact Survey Report—Final," was issued which stated that the staff would not go forward with the IRRIS program, but would revise the 1987 proposed policy by integrating the proposed integrated schedule policy, the IRRIS program, as well as the experience gained from licensees that have implemented integrated schedules.

#### Summary of Public Comments

All but two comments received regarding the proposed policy on integrated schedules were from licensees. Most comments opposed the policy statement as written for several reasons. First, some respondents stated that too much emphasis was placed on incorporating integrated schedules into the operating license through a license condition. There was a concern that licensees not requesting a license condition would not receive equal consideration of scheduler issues as licensees that did request a license condition. Second, respondents indicated that development of a negotiated integrated schedule by licensees with good regulatory compliance records is neither necessary nor appropriate. The respondents believe an amendment to the operating license would require additional resources on their part as well as the NRC and would not significantly enhance the effort to complete licensing activities. Third, respondents indicated that all work efforts should be included in the schedule rather than just NRC-initiated tasks as was discussed in the proposed policy statement. Respondents felt that only including part of the tasks in the schedule may not show that regulatory requirements are receiving timely attention.

Respondents submitting comments regarding the IRRIS program as proposed in SECY-90-347 stated that IRRIS would only address the symptoms of cumulative generic requirements and would not address the problem of management of generic requirements at the front-end of the process. The respondents commented that the IRRIS program should: (1) Include all

regulatory actions and information requests; (2) be implemented through a pilot program with appropriate guidelines and evaluation of the pilot program; (3) have provisions to eliminate low priority items, and (4) remove the freeze on the schedule one year before an outage.

#### Operational Experience

The licensees for seven operating facilities (including two multi-unit sites) have implemented integrated schedules. The licensees include all activities above a certain threshold (such as number of person-hour or cost) in the integrated schedule. Such items would include NRC-mandated items, commitments to NRC generic letters and bulletins, significant actions to resolve items from NRC inspection reports and licensee event reports (LERs), and licensee-initiated actions. Most of these licensees implement a two- or three-tier approach with NRC rules being one tier and the other tiers consisting of commitments and licensee-initiated projects.

The licensees submit integrated schedules to the NRC semi-annually. The priorities are determined by different methodologies, but are based upon general considerations such as safety significance, cost, availability of the plant and of resources. One licensee used the integrated schedule to delay implementation of items indefinitely. In a few cases the NRC has disagreed with the licensees' priority of certain items. However, the process has generally benefitted both the NRC and the licensees.

The proposed policy statement was revised as a result of the comments and feedback from licensees' experience in implementing the integrated schedule. Although the Commission believes that integrated schedules should be developed, licensees are not required to participate in the program or incorporate an integrated schedule into the operating license. Licensees may voluntarily develop and coordinate an integrated schedule with the NRC. Those licensees already implementing an integrated schedule may continue with their current program or adopt a program consistent with the final policy.

#### Final Commission Policy

The Commission believes the implementation of integrated schedules on a plant-specific basis will provide a systematic method of coordinating, managing, and scheduling major modifications and activities initiated by both the NRC and licensees. Integrated schedules could enhance timely compliance with regulatory

requirements and accommodate licensee-initiated activities. The integrated schedule provides a major benefit in its flexibility to assign or reassign resources in recognition of the safety significance.

The integrated schedule program, including the prioritization methodology, the schedule, and periodic schedule updates will be determined by the licensee and submitted to the NRC for review. The major elements of an integrated scheduling program should include the following:

1. A systematic process for identifying and defining those activities to be scheduled;

2. A process for prioritizing and a process for scheduling the individual actions, taking into account factors such as safety, plant availability, radiation exposure, procurement requirements, and costs;

3. A plan for maintaining and updating implementation schedules;

4. A provision for NRC review of the prioritization and scheduling process, the initial schedule and updates;

5. A provision for requesting scheduler relief on NRC-initiated schedules; and

6. A process for evaluating a licensee's maintenance of schedules through the issuance of periodic reports on actions completed, schedules for new actions, and schedule changes that result from new actions or implementation problems.

Licensees who volunteer will develop a program which will result in an integrated schedule containing three levels. Items contained in level 1 of the integrated schedule will be those items with specific implementation dates to be implemented in response to a rule, order, or license condition, including Technical Specifications and amendments. These items will be included in the integrated schedule to provide a complete view of the items that the NRC requires to be implemented. The licensee cannot change the implementation schedules for these items through the integrated schedule program. The licensee must request schedule changes for these items in accordance with standard procedures for applications for license amendments or exemptions.

Items contained in level 2 of the integrated schedule will result from licensee commitments of NRC actions, including generic communications (generic letters and bulletins). Licensees will have the flexibility to establish and revise their scheduler commitments for level 2 items. When an NRC communication is issued, licensees with an integrated schedule will review the

recommended implementation date, will include the item in the integrated schedule, and will prioritize the item among other NRC items in the integrated schedule. The licensee will then provide the NRC with the proposed implementation date in the initial response to the NRC communication. If other items of more significance to safety prevent the licensee from scheduling the newly-initiated item by the date recommended in the NRC correspondence, the licensee will submit to the NRC the justification for the proposed schedule in the initial response to the NRC communication.

The licensee with an integrated schedule program will be able to substitute licensee-initiated safety enhancements in place of NRC-recommended initiatives in those instances in which the licensee's initiatives yield an equivalent safety benefit. The licensee will submit the proposed schedule for the licensee-initiated item and the justification for the substitution.

The NRC staff will have 90 days to review the proposed schedule for implementing level 2 items (90-day negative consent). If the schedule cannot be agreed upon by both parties and if the staff believes that a significant safety concern exists, the staff at any time can issue an order to implement such items. The staff can take this action whether or not a licensee has an integrated schedule.

The licensee can request relief from implementing specific NRC items in level 2 that have not been implemented over a number of years because of their low safety significance. The licensee will need to obtain specific NRC approval for removal of these items. The 90-day negative consent process does not apply.

Items contained in level 3 of the integrated schedule will be other activities such as licensee-initiated projects, LER follow-up, and INPO or NUMARC initiatives. The licensee will identify items to include in level 3 and the threshold above which level 3 tasks will be included in the integrated schedule. The integrated schedule will include only those items above the threshold. Licensees will schedule items in level 3 consistent with commitments and other items in the schedule. Level 3 activity schedules will be submitted to the NRC, but no formal review will be performed by the staff on these items. They are included so the staff can obtain a complete overview of licensee activities.

The licensee will not be required to incorporate the integrated schedule into the operating license as a license

condition. Licensees who volunteer for the program will develop and submit the integrated schedule program, the detailed integrated schedule for a fuel cycle, and a less detailed schedule for future fuel cycles to the NRC. Thereafter, the licensee will submit the detailed integrated schedule for the upcoming fuel cycle and a less detailed schedule for items to be implemented in future fuel cycles. The staff will have a 90-day negative consent period to respond to the integrated schedule proposed by the licensee.

A fundamental premise of integrated schedules is that plant tasks can and should be prioritized. This can also apply to design engineering and analysis efforts that require substantial resources for an extended period of time. The prioritization of these projects can provide a consistent and defensible basis for the initial implementation schedule and for negotiating future changes or additions.

As the prioritization method will be based on a number of factors, many of which will be plant specific, the Commission has concluded that the licensee should select the prioritization methodology, except to the extent that items in level 1 may have to be implemented by specific dates in accordance with the regulation, order, or license condition. Although integrated schedules will be developed and proposed by the licensee, the licensee is obligated to describe the process comprehensively to the NRC. The Commission must understand the planning and scheduling practices and have an overview of ongoing activities at the plant to ensure that licensees are establishing realistic and timely implementation schedules.

The NRC's Divisions of Reactor Projects in the Office of Nuclear Reactor Regulation will manage the implementation of the integrated schedule program. The staff will work with the licensees and other NRC offices, such as the responsible regional office, to develop mutually acceptable schedules.

Licensees currently implementing an integrated schedule may continue their program or adopt the program outlined above. Licensees may withdraw from the program upon notifying the NRC.

This policy statement contains information collection requirements that are subject to the Paperwork Reduction Act of 1980 (44 U.S.C. 3501 et seq.). These requirements were approved by Office of Management and Budget approval number 3150-0168, which expires August 31, 1995.

Public reporting burden for this

collection of information is estimated to average 300 hours annually per licensee. In addition, there is a one-time burden of 300 hours per licensee for submittal of the initial program and a one-time burden of 40 hours for termination of the program. This includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Information and Records Management Branch (MNBB-7714), Division of Information Support Services, Office of Information and Resources Management, U.S. Nuclear Regulatory Commission, Washington, DC 20555; and to Ronald Minsk, Office of Information and Regulatory Affairs (3150-0168), NEOB-3019, Office of Management and Budget, Washington, DC 20503.

Dated at Rockville, MD, this 17th day of September, 1992.

For the Nuclear Regulatory Commission,  
**Samuel J. Chilk,**  
*Secretary of the Commission.*