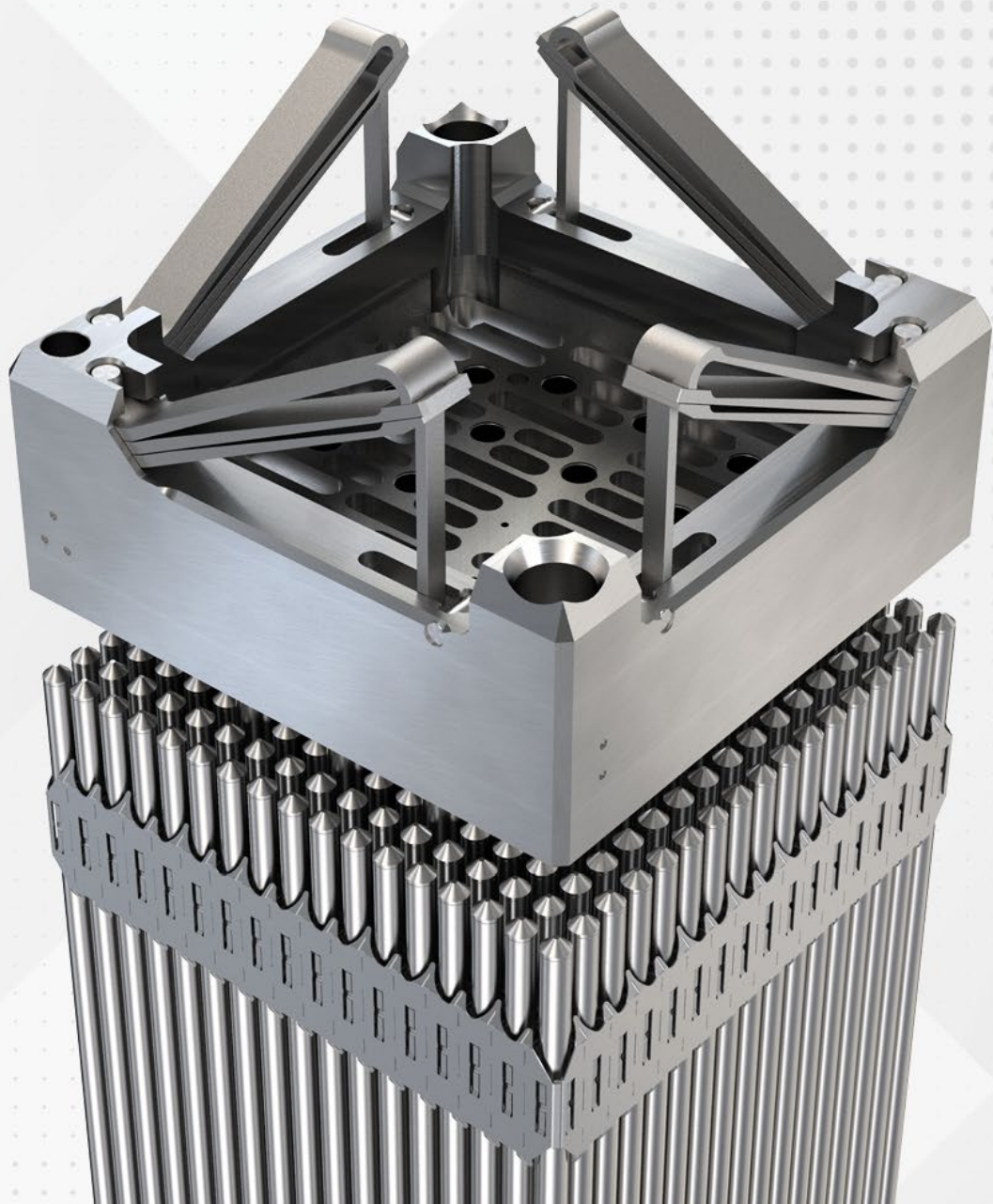


THE PWR OWNERS Operations Manual

June 2023



RECORD OF CHANGES

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THE PRESSURIZED WATER REACTOR OWNERS GROUP

OPERATIONS MANUAL

I. Preface

The Pressurized Water Reactor Owners Group (PWR Owners Group) Operations Manual is a requirement of the PWR Owners Group Charter. The purpose of this Operations Manual is to supplement the PWR Owners Group Charter by assembling in one document, many of the processes, procedures and guidelines necessary for the efficient and effective operation of the PWR Owners Group.

This manual is applicable to all individuals involved in PWR Owners Group activities. This includes utility members, the Program Management Office (PMO), Westinghouse, Framatome or any 3rd party vendor performing work for the PWROG. All individuals involved in PWR Owners Group activities are responsible for understanding and adhering to the requirements of this manual.

The official copy will be posted on the PWR Owners Group Web Site.

II. Mission

The mission of the PWR Owners Group is to improve the competitiveness of member plants through cost-effective resolution of issues common to more than one member, and to provide a superior regulatory interface in support of member activities. This mission will be accomplished by maintaining a focus on the following objectives.

- Support safe and reliable plant operations
- Provide an effective regulatory interface
- Effectively leverage the resources of its members, including Westinghouse and Framatome.
- Provide a forum for joint discussions and resolution of issues common to more than one member
- Provide a mechanism for allocating costs and resources relative to resolution of owners group issues, whether performed by Westinghouse, Framatome, or others
- Provide an effective interface with the BWROG, NEI, EPRI, INPO and other industry groups and owners groups on industry issues
- Share best practices and lessons learned among Members

III. Operational Model

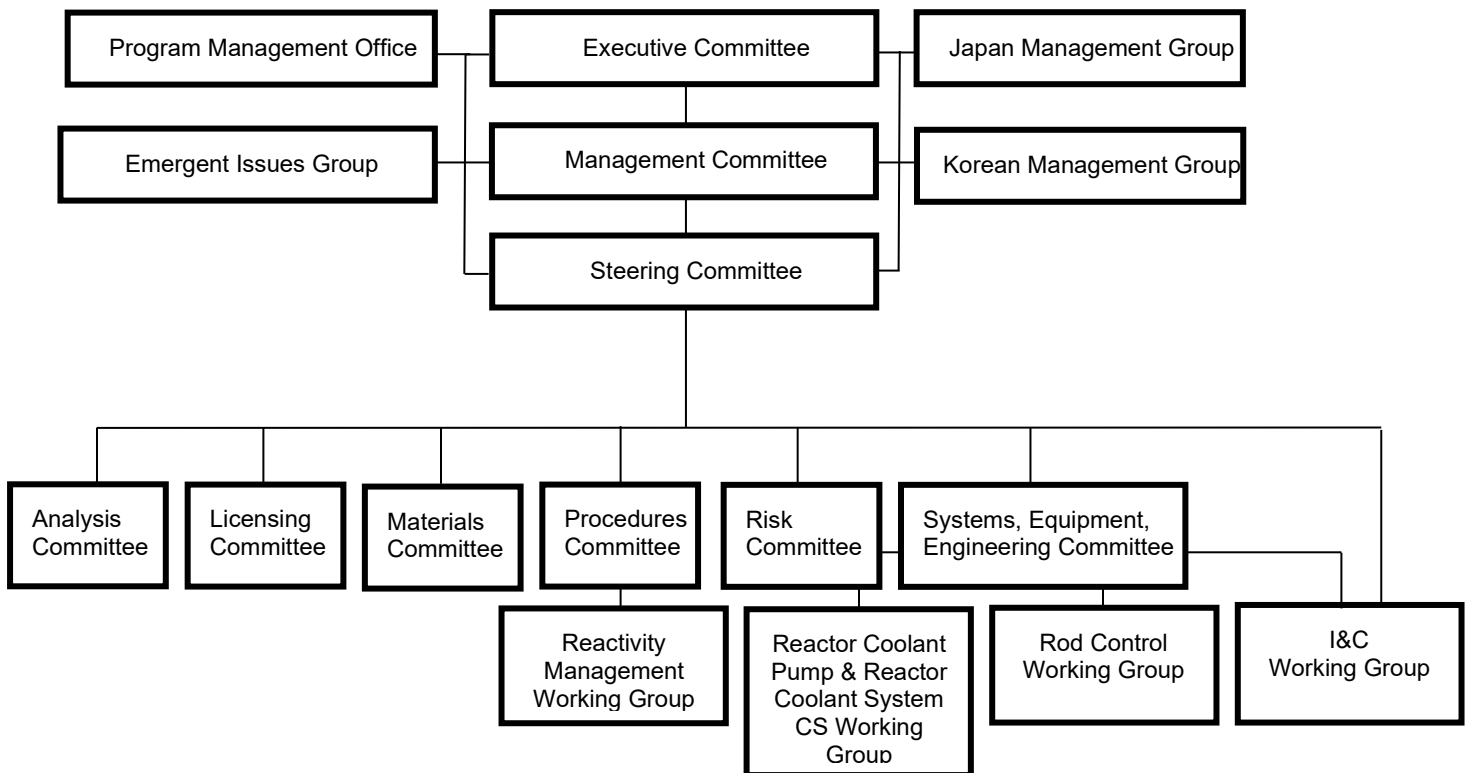
The Operational Model for the PWR Owners Group is composed of an organizational design that aligns and standardizes the necessary work processes, informational flow, decision making and product delivery across the entire membership.

The Utility Representatives and vendors who serve in the roles outlined within our Operational Model work together to support the overall PWR Owners Group Membership by providing industry leadership and operational excellence.

Every member and vendor has a role in contributing to the overall success of the PWR Owners Group. The Operational Model cannot and does not include each and every role within the PWR Owners Group. It provides the basic roles and responsibilities in support of the PWR Owners Group Charter.

The basic hierarchy of the PWR Owners Group is shown visually in Table III-1 (*Organizational Chart*).

Table III-1: PWR Owners Group Organization Chart



IV. Membership and Shares

A. Policy

1. Utility Membership (Domestic & International) is considered continuous without yearly reauthorization.
2. New Utility members can join the PWROG upon acceptance of a formal offer from the PWROG Chairman. Typical new membership is for a minimum of three years.
3. If a Utility wishes to cancel their membership, their Executive Committee Representative should provide one budget year notification to the PWROG Executive Chairman (CEO), the PWROG Chairman (COO) and Project Management Office (PMO) Executive Director.
4. If Utility is shutting down and thus needs to cancel their PWR Owners Group membership, they can do so at any time; however, they are still responsible for the membership fee in the given calendar year and any other financial commitments on participating cafeteria project authorizations.
5. If a utility chooses to no longer be a member of the PWR Owners Group without a plant shutdown, then they shall provide notification by June 30th of the given year; otherwise, they will be responsible for their membership fee for the following year. Regardless of when a withdrawal from the PWROG occurs, the utility in question will be responsible for their financial commitments on participating cafeteria project authorizations.
6. Communication of intended plant shutdown and/or withdrawal from the PWROG shall be done in writing to the PWROG Leadership
7. Westinghouse and Framatome are non-voting members of the PWROG.
8. The shares for all members are calculated per the requirements of the PWROG Charter (Section VI-B) and documented in Tables IV-1 and IV-2.

B. Member Shares

Table IV-1

DOMESTIC MEMBERS

MEMBER	UNITS	# SITES	SINGLE UNIT SITES	MULTI-UNIT SITES	SHARES
AMEREN Missouri	CALLAWAY (W)	1	1		1
AMERICAN ELEC POWER CO.	COOK UNITS 1 & 2 (W)	1		1	1.25
ARIZONA PUBLIC SERVICE CO.	PALO VERDE 1, 2 & 3 (CE)	1		1	1.5
CONSTELLATION	BRAIDWOOD 1 & 2, Byron 1&2, CALVERT CLIFFS 1 & 2 (CE), GINNA (W),	4	1	3	4.75
DOMINION Energy	MILLSTONE 2 (CE) & 3 (W), NORTH ANNA 1 & 2 (W), SURRY 1 & 2 (W), VC Summer (W)	4	1	3	4.75
DUKE ENERGY	CATAWBA 1 & 2, McGUIRE 1 & 2 (W) OCONEE 1,2 & 3 (B&W), ROBINSON 2 (W), SHEARON HARRIS (W)	5	2	3	6
ENTERGY NUCLEAR SOUTH	WATERFORD 3 (CE), ANO 2 (CE), ANO 1 (B&W)	2	1	1	2.25
EVERGY	WOLF CREEK (W)	1	1		1
ENERGY HARBOR	BEAVER VALLEY 1 & 2 (W), DAVIS-BESSE (B&W)	2	1	1	2.25
LUMINANT	COMANCHE PEAK 1 & 2 (W)	1		1	1.25
NEXT ERA -FPL GROUP	ST. LUCIE 1 & 2 (CE), TURKEY POINT 3 & 4 (W), SEABROOK (W), PT BEACH 1 & 2 (W)	4	1	3	4.75
PACIFIC GAS & ELECTRIC CO	DIABLO CANYON 1 & 2 (W)	1		1	1.25
PSEG NUCLEAR	SALEM 1 & 2 (W)	1		1	1.25
STP NUCLEAR OPERATING CO	SOUTH TEXAS PROJECT 1 & 2 (W)	1		1	1.25
SOUTHERN NUCLEAR OPERATING CO	FARLEY 1 & 2 (W), VOGTLE 1 & 2 (W), Vogtle 3 & 4 (W-AP1000)	2		2	3.0
TENNESSEE VALLEY AUTHORITY	SEQUOYAH 1 & 2, WATTS BAR 1 & 2 (W)	2		2	2.5
XCEL ENERGY	PRAIRIE ISLAND 1 & 2 (W)	1		1	1.25
FRAMATOME					
WESTINGHOUSE ELECTRIC CO.					
TOTAL:	61 Units (44 W, 10 CE, 5 B&W, 2 AP1000)	36	10	26	41.25

Table IV-2

INTERNATIONAL MEMBERS

MEMBER	PLANT SITES	# Sites	# Units	Membership Shares	Cafeteria Shares (max)*
AXPOAG	Beznau	1	2	.75	1.25
CEZ**	Temelin	1	2	0.25	1.25
EDF ENERGY LTD.	SIZEWELL B	1	1	.5	1
ELECTRABEL	DOEL 1, 2 & 4, TIHANGE 1 & 3	2	5	.75	2.75
Electronuclear -Eletrobras	ANGRA 1 (W)	1	1	.5	1
Emirates Nuclear Energy Corporation	Barakah 1 & 2	1	2	0.75	1.25
Elektricitets Produktiemaatschappij Zuid-Nederland	Borssele	1	1	.5	1
Eskom	KOEBERG 1 & 2 (W)	1	2	.75	1.25
Hokkaido	TOMARI 1, 2 & 3 (W-MHI)	1	3	.75	1.5
Japan Atomic Power Company	TSURGA 2 (W-MHI)	1	1	.5	1
KANSAI ELECTRIC CO., LTD.	MIHAMA 3, OHI 3 & 4, TAKAHAMA 1, 2, 3 & 4 (W & MHI)	3	7	.75	4
KOREA HYDRO & NUCLEAR POWER CORPORATION	KORI 1,2,3,& 4 HANBIT 1 & 2 (W) HANBIT 3, 4, 5 & 6; HANUL 3, 4, 5, & 6 (CE), SHIN KORI 1&2 (CE)	3	14	1.5	4
KYUSHU	GENKAI 3 and 4 and SENDAI 1, 2 (W-MHI)	2	4	.75	2.5
NUKLEARNA ELECTRARNA KRŠKO	KRŠKO	1	1	.5	1
RINGHALS AB	RINGHALS 3 & 4 (W)	1	2	.75	1.25
SHIKOKU	IKATA 3 (W-MHI)	1	1	.75	1.25
SPANISH UTILITIES <i>(Centrales Nucleares Almaraz-Trillo (CNAT)& Asociació Nuclear Ascó-Vandellòs II (ANAV))</i>	ASCO 1 & 2, VANDELLOS 2, ALMARAZ 1 & 2 (W)	3	5	.75	3.5
TAIWAN POWER CO.	MAANSHAN 1 & 2 (W)	1	2	.75	1.25
ELECTRICITÉ de FRANCE	EDF	18	56	4.0	4.0
TOTALS with EDF		40	108	15.5	N/A

* This is a maximum number of shares to be assumed when an International member participates in a cafeteria Project Authorization (PA). See PWROG Charter Section VI.B.2.d.

** Only members of the PWROG I&C Working Group

V. Committee Operation Process

A. Purpose/Applicability

To describe the process and responsibilities for the various operations associated with a PWROG Committee.

B. Establishing or Disbanding a Technical Committee (TC), Working Group (WG), or Core Team (CT)

1. Typically, a recommendation for a TC will originate from the Steering Committee (SC), while a recommendation for a new WG will originate from the TCs or WGs. Regardless of where the formation recommendation originates, approval is required. *Reference PWROG Charter Section V for definitions of all PWROG groups.*
 - a. Technical Committee: The SC shall submit their recommendation (to form) a TC to the Management Committee (MC) for their consideration and approval.
 - b. Working Group: The TC shall submit their recommendation to form a WG to the SC for their endorsement. In turn, the SC shall submit their endorsement to the MC for their consideration and approval.
 - c. Core Team: The need for a CT could originate from any PWROG group and only needs the approval from the group in question. The CT objectives, membership, Utility Lead, and member responsibilities should be established by a specific mission statement upon CT formation.
 - d. WG, TC and MC endorsements/approval are by simple majority, while SC endorsement requires 75%. See Charter Section VI.A.
2. A recommendation to disband a TC or WG, regardless of who is making the recommendation, should first be discussed by the TC or WG in question. Then input from the TC or WG provided to the SC for evaluation and discussion. The SC would then forward their recommendation to the MC for approval.

C. Committee Membership

1. All Committees and WGs should have at least one primary representative per Utility. Representation for a CT is dependent on the subject matter.
 - a. It is recommended for those Utilities with multiple sites and/or NSSS plant styles, that they also send representatives from each site and/or NSSS. If that is not possible, the representative that does attend should be knowledgeable on all plant sites and NSSS styles in his or her fleet and prepared to represent all fleet sites.
 - b. Identification of Utility representation for the Executive Committee (EC), TCs, and WGs shall be provided by the MC to the PWROG Chairman and PMO. Identification of CT representation will be provided by the group that is forming those CTs.

- c. Designated primary representatives or alternates are expected to participate in PWROG lead activities for their group, including planned meetings, telecons, surveys, and document review and approvals.
2. TC and WG Chairmen will provide the day-to-day leadership for all their Committee activities, such as:
 - a. Lead/direct/prioritize/coordinate programs & develop positions for the PWROG.
 - b. Lead the development/maintenance of strategic plans/roadmaps, prioritization matrix and the Needs-Based Budget (NBB).
 - c. Perform project reviews.
 - d. The Licensing Committee (LSC) Chairman will serve as a member of the Joint Owners Group Tech Spec Task Force (TSTF). The LSC Chairman or delegate will also serve as a member of the NEI Regulatory Issues Task Force (RITF).
 3. TC and WG members will provide input to all activities within their TC or WG, such as:
 - a. Represent the TC or WG on a technical issue or program activity at the request of the TC or WG Chairman. This may involve participation at an industry call or meeting.
 - b. Provide Utility lesson learned and implementation successes during TC or WG meetings.
 - c. Provide input to the TC or WG meeting agenda.
 4. The PMO will support the TC and WG Chairmen in the day-to-day operations for all Committee activities, such as:
 - a. Serve as the focal point for all activities within Westinghouse & FRAMATOME for the utility membership, and for regulatory and associated industry groups.
 - b. Provide program management for all generic and cafeteria funded programs.
 - c. The PMO is responsible for preparing and reviewing all correspondence.

D. PWROG Meetings

1. Schedule and Location:
 - a. All PWROG Committees and WG's will hold meetings on a frequency established in the PWROG Charter. The frequency for CT meetings will be established by their corresponding mission statement or PA.
 - b. The meeting schedules will be posted on the PWROG web site.
 - c. All TCs should strive to co-locate their meetings. Exceptions may be permitted to avoid other PWROG meetings or industry conflicts.
 - d. TC meetings should be held in advance of each General Session meeting.
 - e. Locations will be established by the PMO with consultation from the groups in question and the PWROG Chairman.

2. Meeting Arrangements and Reservations:
 - a. The PMO shall arrange and provide facilities for all meetings.
 - b. All members shall agree to make their reservations to utilize any blocks of guest accommodations that have been arranged as part of the agreement to use the facility for meetings. Not meeting the room block commitment could result in significant increased meeting costs.
 - c. Individual members shall make their own personal arrangements for travel and attendance at the selected meeting facility.

3. Expenses:
 - a. Meeting expenses will be funded by the PWROG. This will include any costs associated with the meeting facility (*i.e. room rental, A/V, food & beverage, and where possible - Internet*). Covering the cost for breakfast or dinner is not guaranteed.
 - b. Direction on cost limitations will be documented in the PMO PAs.

4. Meeting Information:
 - a. Announcements should be issued & posted to the web site approximately 8 weeks in advance of the meeting.
 - b. Agendas should be issued & posted to the web site approximately 4 weeks in advance of the meeting.
 - c. See Project Authorization (PA) Process for the time frames for PAs. [Reference Section VIII.](#)
 - d. Meeting materials (*i.e. presentations or support material*) should be issued and posted to the website at least 1 week in advance of the meeting.
 - e. Meeting summaries should be issued & posted to the web site at least 4 weeks following the meeting. An attendance list should be included in the meeting summary or posted separately on the PWROG website.

E. Meeting Attendance

1. A quorum is required for all PWROG Committee (*EC, MC, TC and SC*) or WG meetings in order to be able to conduct official voting on any topic. *Reference PWROG Charter Section VIII.A for the definition of a quorum.*
2. The Committee/WG Chairman (*or his/her designee*) shall be in attendance of their respective meetings.
3. It is expected that at least one member from each Utility attend PWR Owners Group Committee meetings at all levels.
 - a. If the primary member cannot attend a meeting, then he/she can designate an alternative representative (*Utility member or Westinghouse/FRAMATOME member*). Notification of alternative representation and/or proxy votes (*if necessary*) should be forwarded, via email, to the applicable Committee Chairman and PMO Program Director.

- b. It is recommended (*at the TC and WG level*) for those Utilities with multiple sites and/or NSSS plant styles, that they also send representatives from each site and/or NSSS. If that is not possible, the representative that does attend should be knowledgeable on all plant sites and NSSS styles in his or her fleet that they are representing.
- c. Utilities not meeting established PWROG performance targets for meeting attendance will be reported to the EC for review. [Reference Section XIII](#).
- 4. The PWROG SC members and PMO Executive Director will attend the EC, MC and SC meetings.
- 5. At least one PMO Program Director is expected to attend all PWROG Committee (*i.e. EC, MC, SC or TC*) and WG meetings, as well as other PWROG sponsored meetings.
- 6. The designated member representative from Westinghouse and FRAMATOME should be in attendance for all PWROG Committee and WG meetings, as well as other PWROG sponsored meetings.
- 7. Technical representation from Westinghouse, FRAMATOME and/or other vendors at PWROG meetings will be on an as-requested/approved basis from the applicable Committee Chairman and PMO Executive Director.
- 8. Non-members, including the NRC, NEI, EPRI, INPO and other industry vendors/consultants, may attend PWROG meetings as authorized by the applicable Committee Chairman and PMO Executive Director. Consideration of approval of the non-member should be granted subject to the following:
 - a. The non-member is attending for industry coordination purposes.
 - b. The non-member supports the discussion of a program up for consideration or an issue that cannot be adequately handled by Westinghouse or FRAMATOME.

CAUTION: *Since FRAMATOME and Westinghouse Proprietary information may be presented and distributed during PWROG meetings, attendance of non-members may require a proprietary agreement and non-member attendance should be limited to only relative portions of the meeting.*

- c. Non-members are not to attend the meeting for marketing presentations.
- d. Non-members will be excused for membership only sessions.

VI. Officer Election Process

A. Purpose/Applicability

To describe the process and responsibilities for officer elections at all PWR Owners Group Committee and Working Group levels.

B. PWROG Chairman and Vice Chairman

1. Voting of the PWR Owners Group Chairman and Vice Chairman is the responsibility of the MC. International members present are permitted to vote.
2. Approval is by simple majority of those present and voting.
3. The active SC will resolve any tie votes on any new SC members.
4. Nominations for the PWROG Chairman and Vice Chairman:
 - a. Can be made by the EC or MC; however, anyone within the PWR Owners Group can make a nomination for this position.
 - b. Should be sent to the EC, the active PWROG Chairman and PMO Executive Director at least two (2) months prior to election.
 - c. Each Nominee must be endorsed by the EC prior to the election by the MC. Endorsement shall take place at least one (1) month prior to the election. Exceptions to the one-month time frame may apply if an emergent election is required.
 - d. The PWROG Charter advises that the SC should not contain more than two members from the same Utility.
 - e. The active Vice Chairman should be considered the lead successor to the active PWROG Chairman.
5. Nominees will be asked to commit to serving a minimum of two (2) years if elected. Extensions to the initial 2-year service time are permitted with approval of additional 2-year service intervals; however, each extension must still be approved by the MC. If the active PWROG Chairman is looking to serve beyond four (4) years, then he or she must also be approved by the EC.
6. If the PWROG Chairman or Vice Chairman is not able to complete their current service time period, then a replacement shall be elected by the MC. The replacement will be elected for a full 2-year service period.

C. PWROG Technical Committee and Working Group Chairman

1. Voting of the TC and WG Chairman is the responsibility of the TC and WG membership. International members present are permitted to vote.
2. Approval is by simple majority of those present and voting.
3. The active SC will resolve any tie votes for new Chairmen.
4. Nominations:

- a. Can be made by the SC, TC or WG; however, anyone within the PWR Owners Group can make a nomination for this position.
 - b. Should be sent to the active SC and PMO Executive Director two (2) months prior the TC or WG Meeting for endorsement.
 - c. Each Nominee must be endorsed by the SC prior to the election by the TC or WG. Endorsement shall take place at least one (1) month prior to the election. Exceptions to the one-month time frame may apply if an emergent election is required.
 - d. The PWROG Charter states that the SC should not contain more than two members from the same Utility. The MC approves having more than 2 SC members from the same Utility. If the MC does not approve the additional SC member, then the active SC must present an alternative option to the MC.
 - e. The active Vice Chairman should be considered the lead successor to the active Chairman.
5. Nominees will be asked to commit to serving a minimum of two (2) years if elected. Extensions to the initial 2-year service time are permitted with approval of additional 2-year service intervals; however, each extension must still be approved by the TC or WG. If the active TC or WG Chairman is looking to serve beyond four (4) years, then he or she must also be approved by the PWROG Chairman and MC.
 6. If the TC or WG Chairman is not able to complete their current service time period, then a replacement shall be elected. The replacement will be elected for a full 2-year service period.

D. PWROG Core Team Lead

1. Voting will be the responsibility of all the members of the CT. International members present are permitted to vote.
2. Approval is by simple majority of those present and voting.
3. The TC or WG that sponsors the CT will resolve any tie votes on any new Chairmen.
4. Nominations should be made by the CT members; however, anyone within the PWR Owners Group can make a nomination for this position.
5. Nominees will be asked to commit to serving for the duration of the CT.
6. If the CT Lead is not able to complete their current service time period, then a replacement shall be elected.

E. Removal of Leadership in Mid-Term

1. In the event where a removal of any of the leadership positions is necessary during the course of the current term, then the PWROG Chairman and PMO Executive Director will take that recommendation to the Executive Chairman for their consideration and decision.

- a. If the change is with the PWROG Chairman or Vice Chairman, then the PWROG Executive Director will review the recommendation with the Executive Chairman. The Executive Chairman reserves the right to include other members of the EC, as desired, to make his/her decision.
 - b. If the change is with the PWROG Executive Chairman, then the PWROG Chairman and Executive Director will review the recommendation with the PWROG Executive Vice Chairman.
2. Replacement of the leadership position will follow the standard nomination and election process within this section.

VII. Project Authorization Process

A. Purpose/Applicability

This section will describe the process and responsibilities for developing a Project Authorization (PA). This process applies to the TC's/WG's, MC and SC.

1. A PA is the contract between the PWROG members and the Westinghouse and or Framatome. The PA will contain the purpose, benefit, description of scope, schedule, deliverables and budget being proposed.

B. PA Development

1. A project idea can be recommended or requested at any time by the PWROG membership (*any level*), *Westinghouse & FRAMATOME* or other industry groups (*BWROG, NRC, NEI, EPRI, etc.*).
2. The TC, WG or SC will take ownership of a project idea and develop a PA.
 - a. Determining which TC should have primary responsibility for a PA is typically based on where the program idea originated. If there is doubt to which TC should take ownership of a PA, then the Chairmen of all potentially impacted TCs will come to a consensus.
 - b. The sponsoring TC should evaluate whether or not the PA should be reviewed by another TC. If so, the sponsoring TC Chairman should ensure the PA is forwarded to the appropriate TC Chairman for review. The reviewing TC Chairman will determine the level of review needed by his/her TC (*i.e. the entire TC or a subset of the TC*).
 - c. The review by another TC should take place at the same time as or prior to, the review by the sponsoring TC.
3. The TC/WG will assign either Westinghouse or Framatome to develop the PA.
 - a. The decision shall be communicated to the TC in question, Westinghouse and Framatome at the earliest time possible.
 - b. If there is a dispute in the vendor decision, then either Westinghouse or Framatome may appeal to the EC within 30 days of notification. The appeal shall be in writing from the Westinghouse/Framatome Executive Representative. Once the EC has made its decision, there will be no further appeals.
4. The PA will be developed using the PWROG PA template.
 - a. The PA Template shall be maintained on the PWROG Web site.
 - b. The PA Template is not intended to be a step by step detailed procedure, but rather a common sense outline. Therefore, alterations to the template could be made as necessary to properly define the scope of the PA.
 - c. Non-editorial, changes to the PA template will be approved by the SC.

5. Non-administrative PAs shall follow the Regulatory Strategy process, which is documented on the PWROG Website. A “Regulatory Impact Strategy Development Form” (RISD) is to be completed and evaluated by the Regulatory Strategy Screening Team prior to the TC and or MC voting on the PA, and it should be considered good practice to complete this activity prior to PA development to the extent possible.
6. A draft PA shall be peer reviewed by the PMO and posted for review by the TC/WG no later than four (4) weeks prior to the TC/WG meeting.
 - a. If the PA is not posted within 4-weeks prior to the TC/WG meeting, then the applicable TC/WG membership reserves the right to defer voting on the PA for such time that allows a thorough review. Agreement to proceed with voting during the TC or WG meeting needs unanimous agreement among applicable TC/WG members.
7. The TC/WG members shall review each PA prior to the vote. The EC and MC should also review the generic PAs prior to the TC meeting and provide input to their TC Representative. The reviews should focus on the following:
 - a. Technical Review – Ensure that the scope is technically correct and meets member needs. Ensure their agreement with the Classification that the PA is generic or cafeteria. Ensure their agreement with the propose priority score.
 - b. Schedule/Cost Review – Ensure the schedule supports the Utility or industry needed time-frame. Challenge the cost estimates (*i.e. labor, M&S, T&L*) and ensure they are in-line with the scope of work.
 - c. Utility Review – Confirm applicability to their Utility. With support from their MC Representative, evaluate the need for an exemption or non-funding participation.

C. Exemption & Non-Funding Process

1. An exemption could be requested when the PA scope is not applicable to a member or to a portion of that member’s fleet, the member has already performed substantially the same activity at one or more of their plants, or the plant has announced its shutdown.
 - a. Exemption requests only apply to generic PAs. If a cafeteria PA is not applicable to a Utility, then members should simply abstain or vote “No.”
 - b. If approved for an exemption for a generic PA, the member in question would NOT be a PA participant and would NOT be responsible for providing funding.
2. Non-funding participation should be requested if the member has performed the same or similar work scope and wishes to still participate in the PA and the work they already performed will be of benefit to the PWROG PA (*i.e. reduces the price of the project*).
 - a. If approved, the member in question would be a project participant and receive all PA deliverables but not have to provide funding.

3. The MC is responsible for approving non-funding requests on generic or cafeteria PAs.
4. The MC is responsible for approving exemptions on generic PAs. If there are more than 3 shares approved for an exemption the PA will be converted to cafeteria (*Reference PWROG Charter Section VII.A.5*). *Note that the following will NOT be counted towards the total: 1) "New plants" (i.e. AP1000, APR1400 or other), 2) Plants that have officially communicated a shutdown and request exemptions, 3) Plants that have withdrawn from the PWROG.*
5. For all PAs, the TC and/or MC members, should identify any exemption or non-funding participation requests following initial review of the posted PA.
 - a. Requests and justifications for exemptions or non-funding participation on generic PAs from the TC or MC member should be sent to the applicable Chairman and PMO Program Director 1-week prior to the meeting. The PMO Program Director should communicate this request to the applicable Committee at that same time.
 - b. Justification will be discussed during the applicable committee meeting or a conference call (*if the PA is E-voted*).
 - c. If the non-funding request for a cafeteria PA was identified prior to the TC meeting and endorsed by the TC, then the request and justification should be documented in the PA prior to providing to the MC for consideration. Regardless, the MC should be notified of the request at least 1-week prior to the MC meeting or as soon as possible for E-Voted cafeteria PAs.
6. If a non-funding participation or exemption requests on any PA was not provided within 1-week of the applicable meeting, then the request can only be voted if the all the applicable utility members are prepared and agree to vote. Otherwise the vote will be handled electronically following the meeting.

D. PA Approval (Generic)

1. The TC will approve all generic technical PAs that are less than \$1M. The MC will approve all generic technical PAs over \$1M and all SC PAs. If a generic PA revision causes the PA value to exceed \$1M, then approval of that revision, and future revisions, will be approved by the MC.
2. The TC members will provide their approval vote (PAs < \$1M) or endorsement Vote (PAs >= \$1M) during an official (*i.e. quorum*) TC meeting or Electronic voting (*E-vote*). The MC members will provide their approval vote (PAs >= \$1M & SC PAs) during an official (*i.e. quorum*) MC meeting or Electronic voting (*E-vote*). *An approval or endorsement of a generic PA requires 72% of eligible votes cast by representatives present and voting or their proxies.*
 - a. If the generic PA originates from a WG, then the WG must first endorse the PA. *WG endorsement of a generic PA requires 72% of eligible votes cast by representatives present and voting or their proxies.*
 - b. All WG generic PAs must be sent to the sponsoring Committee for approval or endorsement.

- c. If “new” information is revealed during the TC discussion on a generic PA that is to be voted on by the TC (for approval), then the TC Chairman can defer the approval vote to the subsequent MC meeting.
3. TC approved or endorsed generic PAs should be posted for four (4) weeks prior to the Steering Committee Meeting.
4. The SC will authorize the approved generic PA funding during the subsequent SC meeting or E-vote. *SC authorization of generic PA funding requires 72% of eligible votes cast by SC representatives present and voting or their proxies.*
 - a. The SC will review the generic PAs from an industry need perspective, ensure that TC interactions are identified and coordinated, confirm PA priority, challenge the PA funding amount, and ensure there is sufficient generic funds available in the given year.
5. The MC can request that a TC approved generic PA be discussed during the subsequent MC meeting or during a conference call (*if the PA was E-voted*).
 - a. When possible, the MC is requested to provide at least one (1) week notification prior to the MC meeting of any such PAs that require discussion.
6. If the SC or MC recommends changes to the scope/funding of the generic PA or lengthens the schedule (*excluding those selected for deferral by the SC*), then it should go back to the TC for re-approval.
 - a. The SC or MC may elect to bypass TC re-approval; However, the applicable Chairman must agree.
 - b. Generic PAs with only a price change (not Scope or schedule change) will be communicated to the TC, SC and MC.
7. If there is an exemption or non-funding participation request for a generic PA, then *MC approval requires 72% of eligible representatives present and voting or their proxies.*
 - a. If there is an exemption or non-funding participation request, then the MC shall vote on that request prior to voting on the PA itself.
 - b. Potentially exempted or non-funding MC members are permitted to vote on the exemption/non-funding request.
 - c. If the exemption request is approved, then the exempted MC member is NOT permitted to vote on the PA.
 - d. If the non-funding request is approved, the non-funding MC member IS permitted to vote on the PA.
8. If the generic PA fails at the TC, MC or SC level, it can be re-voted as a cafeteria PA.
9. If a proposed generic PA is deferred by the SC due to budgetary constraints, then it can be converted to a cafeteria PA at the request of one or more MC Committee members.

10. If a PA requires starting prior to the TC approval or SC authorization release, then EIG Chairman can authorize up to \$50K for the PA to begin. If the PA later fails or is deferred, then the PA will stop work immediately.

E. PA Approval (Cafeteria)

1. The TC and WG members, if applicable, will provide their endorsement vote during an official (*i.e. quorum*) TC or WG meeting or E-vote.
2. The TC endorsed PAs shall go to the subsequent General Session for SC and MC consideration.
3. TC endorsed cafeteria PAs should be posted for MC and SC review no later than four (4) weeks prior to the General Session.
4. The SC will review the cafeteria PAs from an industry need perspective, ensure TC interactions are identified and coordinated, challenge the PA funding amount and provide an endorsement vote.
5. The MC members will provide their approval vote during the General Session or E-vote.
 - a. Each MC member may include qualifications with their vote (*e.g. Yes with a total of [x] funding shares*).
 - b. Members with multiple sites and units may subdivide their number of participating shares based upon the applicability of the cafeteria PA to their various units. For example, a member with two shares based upon two single unit sites may vote one participating share should the cafeteria PA be applicable to only one of the sites. However, members shall not share products with the non-funding sites/units.
6. If the SC or MC recommends changes to the scope/funding of the cafeteria PA or lengthens the schedule, then it should go back to the TC for re-endorsement.
 - a. The SC or MC may elect to bypass TC re-endorsement.
 - b. Cafeteria PAs with only a price change will be communicated to the TC, SC and MC.
7. If a cafeteria PA requires starting prior to the MC approval, then EIG Chairman can authorize up to \$50K from the generic budget. Once the cafeteria PA is approved, then the generic funding that was used for the early start will be transferred to the cafeteria funding. If the cafeteria PA is not approved by the MC, then the project will stop work immediately and any work performed from the time the EIG Chairman authorization occurred will be funded by the generic budget.
8. If there is a non-funding participation request for a cafeteria PA, then MC approval requires 72% of eligible representatives present and voting or their proxies.
 - a. TC endorsement of the Non-funding request is considered good practice but not required.
 - b. The MC shall vote on the non-funding request prior to voting on the PA itself.

- c. Potential non-funding participants are permitted to vote for the non-funding request itself and for the PA.
- d. If the justification is not included in the endorsed PA, then it should be provided to the applicable MC Members at least 1-week prior to the MC meeting.

F. E-Vote Process

1. An E-Vote of a PA requires approval of the PWROG Chairman, applicable TC Chairman and the PMO Executive Director if work is beginning prior to a Management Meeting.
2. The TC and MC (*cafeteria PAs only*) should each be permitted two (2) weeks to complete an E-vote. Shorter duration requires PWROG Chairman's approval.
 - a. A PA may be E-voted on by the TC and MC simultaneously, if necessary due to time constraints. Note that this is not the preferred process.
3. Generic PAs will be copied to the SC and MC for review in parallel with the TC E-vote if not on a Management meeting agenda. The MC can request a conference call to discuss the PA prior to E-vote completion.
4. The SC should provide their authorization vote on generic PAs during the TC E-vote. If there are budget constraints, then the SC should hold a conference call prior to the start of the PA to discuss whether the PA should be deferred (*i.e. put on hold until the funding is available*).
5. If an E-voted PA contains an exemption or non-funding participation request, then the TC or MC (*Cafeteria PA only*) will vote on this request before the E-vote is considered complete.

G. International Application of Funds to Specific Generic PAs

1. International PWROG members can apply up to 10% of their generic budget contribution towards PAs or works scope specific to their needs. This can either be done collectively as the full international membership, or in smaller region or technology specific scopes.
2. TC, core team, or region identifies need for international scope as follows:
 - a. A PA not approved domestically
 - b. Incremental scope for international applicability in active/identified TC PA
 - c. New PA for entire scope not needed/applicable domestically
 - d. PA should develop implementable product applicable to more than one member/region
 - e. Incremental scope should be included as purely generic unless TC deems too cost-prohibitive
3. Approval is 72% of applicable international members
4. Vote can be during annual European or Japan conference, OR
5. Held electronically for all applicable international sites
6. Priority will go to projects applicable to the most international members
 - a. If a limited-applicability PA is proposed that subset/region can also fund from just “their” 10%
7. Steering committee authorizes PA via prioritization matrix
8. All results and products from PAs using 10% clause will be available to full membership
9. Funding is not reserved – if no needs are identified the 10% is spent on other generic programs

H. PA Kickoff & Execution

1. A PA can be started following authorization of the SC (*generic*), MC (*cafeteria*), or EIG Chairman.
2. The PMO Program Directors will hold monthly project reviews on all active PAs.
3. It is recommended that TC Chairmen hold 2 project reviews per year and review a select number of PAs from their Committee.
4. The SC will report on select TC and WG generic and cafeteria activities (*progress or issues*) to the EC and MC
5. As the PA progresses, the TC/WG Chairman (*for generic*) and TC/WG participants (*for cafeteria*) may agree upon changes to a PA’s scope that are within the original intent and document the change through a revision to the PA.

- a. The revision does not require a MC approval provided it is a generic PA or there is no change to the intent-of-the-scope/deliverables/price/schedule for a cafeteria PA.
 - b. Notice of the PA revision and summary of changes will be communicated to the TC/WG, SC & MC.
6. The PWROG Chairman or TC Chairman has the authority to approve additional funding for up to \$50,000 per generic funded PA, if required to proceed with work in advance of the next PA revision.
 - a. Chairman increases for cafeteria funded PAs are not permitted.
 7. If a cafeteria PA does not spend all that was projected in a given year, then the remaining funds can be shifted into future calendar years provided that shift is not more than \$50K total or \$1K/share (*the higher of the two*). Shifting more than this amount requires a PA revision approved by the applicable MC members. Any forecast adjustments need to be communicated to the MC.
 8. A generic PA can be placed on hold at the discretion of a TC Chairman or the PWROG Chairman. For cafeteria PAs, the hold point must be approved by the participating MC members.
 - a. Other hold points can be defined within the PA itself as agreed upon by the applicable members.
 - b. If a generic PA is put on hold due to budgetary constraints and has been deferred for 1 year or longer, then the PA should be revised to reflect an updated scope, schedule and forecast.
 9. Throughout the course of a given PA, the TC members are expected to review & access project related documents on the website, provide input on PA draft deliverables, or respond to survey requests.
 - a. MC members should also monitor the performance of the TC and WGs projects by accessing and reviewing applicable documents on the web-site.

I. PA Closure & Reconciliation

1. A PA is considered closed following the final PA invoice and all planned PA deliverables have been issued and posted to the PWROG Web site.
2. Unspent funding of completed Time & Material (*T&M*) PAs shall be reconciled back to the PWROG membership and reported to the MC.
3. Completed PA deliverables shall be added to the PWROG Product Implementation Matrix.
 - a. MC and TC members shall provide input to the product implementation matrix by indicating whether their Utility has implemented, plans to implement or will not implement a PWROG product.

VIII. Prioritization Process

A. Purpose/Applicability

This section will describe the process and responsibilities for prioritizing PWROG PAs. This applies to the MC/TC/WG, SC and PMO.

B. Generic PA Prioritization

All generic PAs will be prioritized and managed by the Steering Committee. The prioritization criteria are updated intermittently. The prioritization matrix, including criteria, will be controlled and maintained by the Steering Committee, and will be available on the PWROG website.

IX. Emergent Issues Group Process

A. Purpose/Applicability

The EIG operates as an issue management oversight committee whose major functions are to ensure that the program operates in a manner which is in accordance with the PWROG charter and acts as a "check and balance" by reviewing and monitoring the EIG issue progress.

The EIG participates with Westinghouse and Framatome in an interactive communication process that will enhance the definition, communication, and resolution of potential Part 21 issues and emerging industry issues by drawing upon the collective knowledge of Westinghouse, Framatome and utility members.

In addition, the Emergent Issues Group (EIG) shall respond to INPO's activation of the Incident Response Center (IRC) and rapidly provide the NRC with a basis for logical and reasoned regulatory response as necessary based on the issue. The EIG Chairman will also coordinate with the NEI Regulatory Issues Working Group (RIWG) as necessary based on the issue.

The EIGs primary function is to interactively work with Westinghouse and/or Framatome or the utility raising the issue to define/validate the potential issue and to provide input to the recommended courses of action for resolution of the issue.

More specifically, when reviewing potential issues, the EIG tasks are as follows:

- Review written correspondence of draft issue write-up (e.g. RISD Forms) and/or participate in overview EIG telcon to review evaluation of the issue.
- Review draft Westinghouse or Framatome Communications (e.g. NSAL, Tech Bulletin, Infogram, etc.)
- If an operability determination is necessary, recommend operability determination framework.

- Identify need for additional PWROG Involvement.
- Identify need for PWROG / NRC Interaction.
- Determine EIG level of involvement of the issues as future actions progress.

B. General Membership

The PWROG Vice-Chairman shall serve as EIG Chairman for each subject area (*Emergent issues review and potential Part 21 issues review*) covered by the EIG. The EIG shall be comprised of a fixed membership of the Steering Committee, plus up to four (4) additional members (“at-large” members) whose role is to assure that the spectrum of Westinghouse, CE and B&W NSSS designs are represented. The EIG Chairman will recommend and approve the “at-large” membership.

1. Specific Membership: For each subject area addressed by the EIG, there shall be members added to the EIG as determined necessary by the “General” membership of the EIG. See “Additional Membership” under the specific overview sections of the EIG subject areas in X.C.2.
2. PWROG PMO, Westinghouse and Framatome Membership:
 - a. The PWROG PMO Executive Director shall be a non-voting member of the EIG.
 - b. The PMO Licensing Program Director shall be a non-voting member of the EIG.
 - c. The Westinghouse and Framatome Project Managers and Licensing/Regulatory managers shall be non-voting members of the EIG.
3. EIG Chairman Roles and Responsibilities:
 - a. Chairs all EIG meetings and conference calls
 - b. Reviews potential emergent issues raised by PWROG members or vendors and evaluates if the EIG shall be assembled.
 - c. Sets the date and times of EIG Assembly
 - d. Approves any EIG communication
 - e. Authorizes generic funding to initiate work to address an emergent issue in advance of a formal PA if less than \$50,000.
 - f. Recommends and/or approves the “At-Large” Membership of the EIG, including an Executive Sponsor.
4. EIG Utility Member Roles and Responsibilities:
 - a. Participate in EIG conference calls or meetings to review emergent issues as brought for by the EIG Assessment Team.
 - b. Provide feedback on the recommended action as discussed during EIG calls or meetings. This would include evaluating the safety or operational significance of the emergent issue, input to the development of a course of

action, recommended timing of that action and input to the communication plan.

- c. Review Westinghouse Tech Bulletins, Nuclear Safety Advisory Letters, Infograms, or Framatome safety assessment letters prior to issuance to Utilities.
 - d. Review of any communications from the EIG.
 - e. Votes to approve EIG advance funding for issues between \$50K and \$100K.
5. Roles and Responsibility for the Westinghouse or Framatome EIG Project Manager for issues which originate from the vendor:
- a. Coordinate and facilitate scheduling of all EIG conference Calls or meetings.
 - b. Coordinate the preparations for all EIG conference calls and meetings.
 - c. Coordinate all EIG communications.
 - d. Prepare call summaries for EIG Chairman Review and approval which is subsequently posted on the PWROG website (when deemed appropriate).
 - e. All other coordination activities not discussed in 5.a-d will be coordinated by the PWROG EIG Program Director

C. Emergent Industry Issues Review

1. Scope of Work: To review, advise and provide an industry perspective along with guidance for emergent industry issues raised by Westinghouse, Framatome or utility members that could have a generic impact on the PWROG membership. This would include review of all Westinghouse and Framatome generic communications (e.g. NSAL, Tech Bulletins, InfoGrams) that may or may not be potential Part 21 Issues.

For issues raised by the vendors the EIG will assist Westinghouse and/or Framatome in its assessment of the issue and development of the action plan for resolution of the issue prior to Westinghouse or Framatome issuing a formal communication to its customers.

2. Additional Membership:
- a. At the discretion of the EIG Chairman, members (*Domestic and International*) could be added to the General Membership (i.e. subject matter experts) for specific issues based on representation from the affected utility(s).
 - b. At the discretion of the EIG Chairman, a Utility Executive Sponsor could be added to the General Membership to support discussions with the NRC and to provide executive direction and/or executive oversight.
 - c. Quorum: The minimum number of EIG members needed to hold a conference call shall be: EIG Chairman, 3 EIG members and one Westinghouse and/or Framatome member.

3. Activation:

- a. Whenever a potential emerging issue is raised, the EIG Chairman, PWROG Chairman, the person raising the issue, the PMO Executive Director, PMO EIG-Program Director and EIG Project Manager from Westinghouse and/or Framatome (“EIG Assessment Team”), as appropriate, shall review the potential emerging issues and the EIG Chairman will determine if the EIG shall be activated to review/follow the issue. Agreement to activate the EIG should be a collective decision by the “Assessment Team;” however, the EIG Chairman has the final decision to activate.
- b. If the potential emerging issue is raised by a utility representative, it is highly suggested that a Regulatory Impact Strategy Development (RISD) Form be completed.
- c. The EIG Chairman shall activate the EIG for any emerging industry issues raised by the Industry (NRC, NEI, EPRI or INPO), the PWROG membership, Westinghouse or Framatome.
- d. Examples for activation of the EIG could include:
 - 1) A generic emergent issue applicable to more than one PWROG member.
 - 2) A System, Structure, or Component that is Deemed “Important to Safety” (*Reference ANSI/ANS 51.1, “Nuclear Safety Criteria for the design of Stationary Pressurized Water Reactor Plants”*) and is Potentially Inoperable.
 - 3) Compensatory and/or Corrective Action is potentially required.
 - 4) Explicit assumption inherent in the design or analysis that potentially requires corrective action.
 - 5) Issues generally applicable to more than one plant and not the result of a plant specific condition or activity (ex. Outage specific incident).
 - 6) A condition or analysis that is potentially outside the design/licensing basis of the plant.
 - 7) A significant operating event generically applicable to membership (e.g. INPO’s activation of the IRC).
 - 8) Emergent screen of a Regulatory Strategy Impact Development Form

4. Assembly:

- a. The EIG shall assemble at a date and time designated by the EIG Chairman. Normally, the EIG will conduct all meetings via conference call unless otherwise directed by the EIG Chairman.
- b. *Frequency of calls:* EIG conference calls shall take place on an as needed basis designated by the EIG Chairman. It is recommended that prompt action be taken and if the EIG Chairman requests for a conference call, it be conducted within 5-10 business days.
- c. *Coordination of calls:* The Westinghouse or Framatome Project Manager for the EIG will coordinate all EIG conference calls for vendor related issues and

the PWROG EIG Program Director will coordinate EIG conference calls for issues initiated from a utility member.

- d. *Additional General Membership Roll Call:* If the EIG Chairman approves additional members to join the EIG conference calls (reference section X.2.a), these additional members shall be identified during the roll call portion of the call and/or meeting including their potential roles and responsibilities.

5. Assessments and Recommendations:

- a. The EIG shall assess the safety significance of the emerging industry issue and shall develop a recommendation for appropriate action, or a recommendation for no action.
- b. If action is recommended, they shall also recommend a response time, provide a basis for that response time and provide a recommendation for communication to the industry.

NOTE: Westinghouse and Framatome shall be involved in development of the assessments and recommendations.

6. Communications:

- a. *Notification of EIG conference calls:* The Westinghouse or Framatome Project Manager for the EIG or EIG Program Director will notify all EIG Members of the scheduled conference call utilizing the EIG Roster published on the PWROG website.
- b. *Communication Plan:* For each time the EIG is convened, the EIG should discuss the development of a communication plan with considerations for PWROG management and/or executive level communications. It is recommended that the communication plan be documented on an RISD form when appropriate.
- c. *Conference Call Summary:* A conference call summary should be issued to the EIG members no later than two (2) weeks after the conference call (*earlier if deemed necessary by the EIG Chairman*). If deemed appropriate by the EIG Chairman, the call summaries will be posted on the PWROG website via PWROG letter.
- d. *Communication during resolution of issue:* If action is recommended, the appropriate level of communication within the EIG shall be determined as part of developing the recommended actions. At this time, it shall also be determined whether or not communication outside the EIG is necessary.
- e. For Westinghouse or Framatome issues, the Westinghouse or Framatome Project Manager for the EIG will read the following disclaimer at the beginning of all EIG calls related to vendor issues and the disclaimer shall be included in all EIG correspondence and verbally re-iterated to anyone outside of the EIG membership that is asked to help resolve an EIG topic/issue.

Caution Regarding PRELIMINARY information

NOTE: It should be noted that information being provided by Westinghouse and/or Framatome to utilities in this interactive communication process is information which has often been collected as part of the discovery phase of an investigation. Consequently, the information is considered to be PRELIMINARY, indicating that it is unverified and that varying degrees of change can be expected as the investigation proceeds. It is inappropriate for such PRELIMINARY information to be utilized to make plant specific operability or reportability determinations. EIG members are responsible for ensuring that this information is not inadvertently misused at their respective utilities.

- f. *Notification of the Emerging Industry Issue to Utilities:* Upon agreement by the EIG, communication to Utilities can be handled by, but not limited to Info-grams, Technical Bulletins, Letter Reports, Email or PAs.
NOTE: Timing of the communication will be agreed upon by the EIG, including the Westinghouse and/or Framatome Project Manager(s).
 - g. *Report to the PWROG (Management Committee):* During each PWROG Management Committee meeting, the EIG Chairman shall report on the status of the active emerging industry issues that the EIG is following, as well as provide a notification of emergent industry issues which have been closed.
7. Funding:
- a. Funding shall be provided to Westinghouse and Framatome for preparation and support of EIG conference calls. This is not intended to provide supplemental funding to Westinghouse or Framatome to resolve an issue unless otherwise directed by the EIG utility members.
 - b. At the discretion of the EIG utility members, work beyond the conference call preparation must be pursued under separate project authorization or individual contract(s) to Westinghouse or Framatome.
 - c. Funding shall be provided to Westinghouse and Framatome for preparation of the status report to the PWROG Management Committee, and various Committees, as requested.
 - d. The EIG Chairman is authorized to commit funds up to \$50,000 of generic funding (*per issue – generic or cafeteria*) if required to proceed with work in advance of the next General Session. Funding in excess of \$50,000, up to \$100,000, can be authorized by the Utility members of the EIG (75% approval) for generic issues that require more detailed pre-work prior to developing a PA. Additional authorization from the TC and MC is required prior to total expenditures exceeding \$100,000 on generic PAs and \$50,000 on cafeteria PAs, respectively.
 - 1) Regardless of the issue classification (*generic or cafeteria*), if additional funding is needed beyond the EIG authorized amount, the PA for

additional funding must also include funding to recover the pre-authorized amount.

- 2) For generic issues, if the EIG authorized amount completes resolution of the issue, a generic PA is not required to recover the pre-authorized amount.
- 3) For cafeteria issues, a cafeteria PA must be proposed to recover the generic funding that was authorized by the EIG.
- 4) The EIG Chairman, as a matter of good practice, should seek the consensus of the EIG prior to authorizing any funding up to \$50K, if the timing of the issues allows it.

X. Regulator Interaction Process

A. Purpose/Applicability

This section will provide the general process and responsibilities when interacting with the NRC. This applies to all levels of the PWROG, but is mainly intended for the TC's/WG's, MC and SC.

B. General Communications

1. The PWROG Chairman shall ensure that the latest policy statement on communications with the NRC has been transmitted to the appropriate NRC office. The statement shall include the name and address of the current PWROG Chairman and directions regarding correspondence to the PWROG.
2. In formal communications with the NRC, the policy of the PWR Owners Group is to defer generic commitments until the SC has reviewed the situation and agreed to a course of action.
3. All formal NRC correspondence provided to the PWROG related to PWROG PAs will be distributed to the applicable members for their information and use via the PWROG website.
4. The Licensing Committee Program Director will be the single point of contact for all PWROG communications with the NRC. This includes:
 - a. Scheduling conference calls or meetings
 - b. Topical Report (TR) submittals
 - c. Letters to the NRC of any kind
5. If any PWROG member (*utility or vendor*) has informal communication (*email or phone calls*) with the NRC to discuss PWROG business, they should inform the Licensing Program Director, the PWROG Chairman, PMO Executive Director and applicable TC Chairman.
6. All official PWROG correspondence to the NRC shall be under signature of the PWROG Chairman.
 - a. Such transmittals should be reviewed by the applicable TC Chairman, the LSC Chairman the PWROG Chairman and the PMO NRC-Program Director. These conditions apply to both generic and cafeteria funded programs, regardless of whether or not the Chairman's utility was a participant.

C. Meetings with NRC

1. The TC and WG Program Directors shall send all meeting and conference call requests (including industry pre-job briefs) to the Licensing Committee Program Director. Copy the PWROG Chairman, LSC Chairman, applicable TC Chairman, PMO Program Director for the NRC, and the Executive Director.

- a. Informal calls or meetings should not take place without prior notification to the Licensing Committee Program Director, PWROG Chairman, LSC Chairman, applicable TC Chairman and the PMO Executive Director.
2. It should be assumed that there will be NRC fees for holding any meeting or conference call.
 - a. If a meeting or conference call is to be “fee exempt”, the process for 10 CFR 170.11, Exemptions shall be followed accordingly.
3. The applicable TC/WG PMO Program Director and TC Chairman will see that an agenda is prepared and issued before the meeting, that the NRC is in agreement with the agenda, and that the objective or purpose of each meeting is clearly defined, including the proprietary nature of the meeting and if the meeting will be open or closed to the public.
4. A PWROG meeting notice and agenda will be issued to the SC, MC, TC/WG, the Licensing Committee Program Director, the Westinghouse Licensing Manager (when appropriate) and the FRAMATOME PMO Executive Program Director (when appropriate) at least ten (10) days prior to the meeting in support of the NRC requirement to post meeting announcements.
 - a. This does not apply to conference calls with the NRC.
5. If meeting materials are developed for an NRC meeting or call, the PWROG Licensing Chairman or the LSC Chairman designee should review the slides. Slides should be developed at least one week prior to the NRC meeting/call so that proper time is given for comment consideration.
6. A internal/PWROG only Pre-job brief shall be conducted for all NRC meetings.
7. The applicable TC Chairman will attend and lead the meeting on behalf of the PWROG. In the event the Chairman is unable to attend the meeting, the Chairman must designate an alternate utility spokesperson. If a utility spokesperson is to be designated, the preferred candidates are members of the SC or members of the applicable TC/WG that have previous experience representing the PWROG at NRC meetings.
8. A member of the PMO should also attend any NRC meeting in person or via teleconference. An alternate may be assigned by the PMO as approved by the Utility lead in question. It is recommended that the alternate be a senior Westinghouse or Framatome representative(s), with previous NRC meeting experience.
9. Meeting or Conference Call Protocol:
 - a. No commitments are to be made to the NRC at any meeting unless the commitment is specifically within the scope of an already approved program.
 - b. Under no circumstances may the PWR Owners Group make a commitment for a licensee.

- c. NRC requests for additional commitments are to be brought to the attention of the PWROG Chairman.
10. A meeting summary will be prepared by the attending PMO Program Director or designee for all PWROG meetings with the NRC.
- a. Posted approximately four (4) weeks following the meeting.
 - b. Sent to the applicable TC/WG, with copy to the SC, MC, PMO Executive Directors (W/Framatome).
 - c. For conference calls, it should be considered good practice to prepare a meeting summary.

D. NRC Submittals

- 1. Reports, information and other correspondence prepared for the PWROG to be transmitted to the NRC must follow existing policy and procedures for transmittal of such information outside of Westinghouse or Framatome.
- 2. Members wishing to docket PWR Owners Group correspondence should either reference or submit the correspondence to the NRC.
- 3. The PWR Owners Group shall not represent any specific utility in discussions with the NRC.
- 4. If an NRC submittal or transmittal for information only is to be “fee exempt”, the process for 10 CFR 170.11, Exemptions shall be followed accordingly.

XI. Release of Products, Reports and Papers

A. Purpose/Applicability

This section will provide the rules and requirements with respect to providing/releasing PWROG products to both PWROG Members and non-members. In general releasing information to outside organizations, such as the NRC, NEI, EPRI, etc. should be stipulated within the PA itself. The requirements below also apply.

This process is applicable to the entire PWROG membership (*Utility and Vendor Members*).

A PWROG product is defined as any information or deliverable from a PWROG PA.

B. Release of PWROG Products to PWROG Members

1. The release of deliverables from PWROG funded PAs shall be only to participating members of a PA and the product itself shall include the following:
 - a. Reference to the PA on the cover page.
 - b. PWROG Distribution Notice, Copyright Notice and Legal Notice. See below.
 - c. Participation Table (*Posted on the PWROG Website*)
2. If a PWROG member wishes to obtain a PWROG product that was funded from a PA they did not participate in, then that member must first join the PA in question. See Charter rules for joining late into PAs.
3. Distribution Notice (Prop or Non-Prop): *“This report was prepared for the PWR Owners Group. This Distribution Notice is intended to establish guidance for access to this information. This report (including proprietary and non-proprietary versions) is not to be provided to any individual or organization outside of the PWR Owners Group program participants without prior written approval of the PWR Owners Group Program Management Office. However, prior written approval is not required for program participants to provide copies of Class 3 Non Proprietary reports to third parties that are supporting implementation at their plant, and for submittals to the NRC.”*
4. Copyright Notice (Non-Prop): *“This report has been prepared by Westinghouse Electric Company/Framatome and bears a Westinghouse Electric Company/Framatome copyright notice. As a member of the PWR Owners Group, you are permitted to copy and redistribute all or portions of the report within your organization; however, all copies made by you must include the copyright notice in all instances.”*
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Company/Framatome copyright notice. Information in this report is the property of and contains copyright material owned by Westinghouse Electric Company LLC/Framatome and /or its subcontractors and suppliers. It is transmitted to you in confidence and trust, and you agree to treat this document and the material contained therein in strict accordance with the terms and conditions of the agreement under which it was provided to you.

As a participating member of this task, you are permitted to make the number of copies of the information contained in this report that are necessary for your internal use in connection with your implementation of the report results for your plant(s) in your normal conduct of business. Should implementation of this report involve a third party, you are permitted to make the number of copies of the information contained in this report that are necessary for the third party's use in supporting your implementation at your plant(s) in your normal conduct of business if you have received the prior, written consent of Westinghouse Electric Company LLC to transmit this information to a third party or parties. All copies made by you must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary."

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 - a. *Makes any warranty or representation, express or implied including the warranties of fitness for a particular purpose or merchantability, with respect to the accuracy, completeness, or usefulness of the information contained in this report, or that the use of any information, apparatus, method, or process disclosed in this report may not infringe privately owned rights; or*
 - b. *Assumes any liabilities with respect to the use of, or for damages resulting from the use of, any information, apparatus, method, or process disclosed in this report."**

C. Release of PWROG Products from Closed Generic or Closed Cafeteria PAs (equal to or greater than 10 yrs)

1. Any request for release of a PWROG product should be directed to the PMO. The PMO will inform the applicable vendor of the request. The vendor in question will take the action to address the release request.
2. Notification to the PWROG Chairman and PMO Executive Director is required prior to the release of the product.
3. The release of a PWROG product is at the discretion of the vendor that developed the product.
 - a. The vendor in question must adhere to their releasing requirements for proprietary and non-proprietary information.

D. Release of PWROG Products from Active PAs or Closed Cafeteria PAs (less than 10 yrs)

1. The request will officially be made in writing (*email or letter*) from the organization in question to the PWROG PMO.
 - a. The request shall state that the PWROG product will only be used internally and not made public or be resold (*in any form*) to other organizations.
2. The release of a product from an active generic PA must be approved by the PWROG Chairman, the applicable TC/WG Chairman and the applicable vendor.
 - a. The vendor in question must adhere to their releasing requirements for proprietary and non-proprietary information.
3. The release from an active cafeteria PA or a cafeteria PA that has been closed for less than ten (10) years must be approved by the MC participants of the PA in question and the applicable vendor. Approval is considered as 75% or more agreement from the PA participants and the applicable vendor. The product cannot be released without vendor approval.
 - a. The vendor in question must adhere to their releasing requirements for proprietary and non-proprietary information.
 - b. MC approval is not required if the release is in support of implementation for the Utility in question or in support of an NRC submittal.
4. The PMO shall ensure that proprietary agreements are in place between Westinghouse or Framatome and the receiving party before proprietary documents will be released.
5. Westinghouse or Framatome must follow their existing policy and procedures for releasing products or reports.

E. Papers Presented to Industry

1. Presentation or publication of a paper to the industry containing general information about the PWROG must first obtained approval of the content by the PWROG Chairman and the PMO Executive Director.
2. Presentation or publication of a paper to the industry containing information from an active generic PA must first obtained approval of the content by the PWROG Chairman, the applicable TC/WG Chairman, the PMO Executive Director and the applicable vendor.
3. Presentation or publication of a paper to the industry containing information from an active cafeteria program or a closed cafeteria program (less than 5 years old) is only permitted with a 75% or greater approval of the participating members and approval from the applicable vendor.

4. Westinghouse or Framatome must follow their existing policy and procedures for presenting and or publishing a technical paper.



XII. Key Performance Indicators

A. Purpose/Applicability

The purpose of this section is to define the PWROG Key Performance Indicator (KPIs) and provide basic guidance for obtaining and tracking the data.

This process is applicable to the entire PWROG membership (*Utility and Vendor Members*).

B. Process

1. The PWROG will monitor and track KPIs to assess the performance of the organization.
2. KPI Status will be presented to the EC and MC at their respective meetings throughout the year.
3. The PMO will have primary responsibility for collecting the KPI data.
 - a. Product Implementation data will be obtained primarily from the TCs and WGs, with support from the MC.

C. Definition of the KPIs

1. KPI's will be identified, communicated, and updated based on input and feedback from the Management Committee. All KPI measurement Criteria and goals will be maintained and posted on the PWROG Website.

XIII. Financial Process

A. Purpose/Applicability

The purpose of this section is to provide the basic roles and responsibilities with respect to the PWROG finances. This process applies to the MC and PMO.

B. PWROG Funding / Budgets

1. Each Utility's MC Representative is responsible for their PWROG budgets.
2. The PWROG generic budget will be a fixed per share amount in any given year as approved by the EC.
3. The PWROG cafeteria budget is an open-ended per share amount and is dependent upon what cafeteria PAs the Utilities agree to participate in for the year. The actual per share amount is also dependent on the total participation in the PA.
4. The Membership Fee (i.e. generic budget) is documented in the PWROG Charter.
5. The estimated cafeteria budget, on an NSSS basis, will also be provided to the EC and MC in the same time frame as the generic budget.
6. The PMO Controller will issue a request for purchase orders two (2) months prior to the budget year in question. This request will include the planned generic per share amount, plus the current cafeteria commitment. It will NOT include cafeteria funding needed for additional PAs that a Utility may wish to join throughout the given budget year.
 - a. The MC should work to having the PO in place by January.

E. Financial Reporting

1. A Customer Financial Report (CFR) will be published once a quarter with Monthly Financial Statements (MFS) during the remaining months.
 - a. The CFRs will contain a list of all generic and cafeteria PAs that each Utility has agreed to be a participant, along with the projected commitment amount for the given year.
2. Any questions on the CFR should first be directed to the PMO Controller.

F. Invoices

1. Invoices for the United States and International members of the PWROG are prepared and submitted directly to the participating utilities. Some exceptions may apply as agreed upon between the PMO Controller and the Utility in question.
2. Invoices will be charged against the purchase orders established for each member or will be charged against other purchase orders as directed by the MC Representative.

XIV. Website Process

G. Purpose/Applicability

The purpose of this section is to provide the basic roles and responsibilities with respect to the PWROG website. This process applies to the entire PWROG membership.

1. The PWROG website (<http://www.pwrog.com>) has been established as the primary communication tool for the PWR Owners Group.
2. The PWROG web site is the only approved method for receipt of PWROG products.

H. Content

At a minimum, the PWROG website will contain the following:

1. General administrative information, including the latest version of the PWROG Charter, this Operations Manual and the current year meeting schedule
2. Roster of members by committee and by Member Company
3. WOG/PWROG correspondence since 1998 and previous CEOG correspondence since 2000,
4. Pages for each Committee and active Working Group with meeting announcements, agenda, presentations, project authorizations and summaries
5. Final products from programs since 1998 and previous CEOG products from 1998 to the present
6. B&W Owners Group information prior to joining the PWROG is available from Framatome.

I. Security

1. The web site is a secure site and access to the web site will be controlled by a secure sign on using a Microsoft Authenticator Application.
 - a. Utility members that desire access to the website should contact the PMO Web site Coordinator or their respective PWROG Program Director.
 - b. The MC will review access for all PWROG representatives and alternates at their utility

XV. Lead Plant Process

A. Purpose/Applicability

This section will describe the process and responsibilities to select a lead plant for a PWROG PA. A lead plant is defined as a PWROG plant that will serve as a *first-time* application of a new process, technique, or methodology developed through a specific PWROG PA. A lead plant may be:

- A single plant,
- A multiple plant site provided the individual plants are nearly identical relative to the implementation of the new process, technique, or methodology such that there are no significant additional costs, or
- Multiple plants sites as required by the PA in order to justify that the new process, technique, or methodology can be implemented by all members participating in the program.

B. Request for Lead Plant

1. In order to provide every PWROG member an opportunity to volunteer their plants to serve as a lead plant, a letter (*'request letter'*) will be issued by the PMO requesting lead plant volunteers.
 - a. The request letter should be addressed to the EC, SC, MC members, and the appropriate TC/WG Representatives.
 - b. The letter should provide a brief description of the associated PWROG PA, estimated utility resources required to support the PA, and lead plant expectations (see Section D). A table should be included showing the estimate of utility resources by program task.
 - c. The letter should provide a sufficient time frame for the members to consider the opportunity and provide a response to the PMO. A minimum time frame of 30 days is recommended.
 - d. The letter should be issued prior to the associated program being approved or shortly after the program has been approved to insure that significant program funds are not expended before a lead plant has been selected.

C. Selection of the Lead Plant

1. For PAs requesting as many lead plants as possible, all plants that volunteer within the request letter time frame will be selected. Plants that volunteer after the request letter time frame will also be selected given that their participation does not delay the associated PA or increase the PA cost.
2. For PAs requesting only one lead plant or one lead plant per a specific plant type (*W, CE, B&W – 2-loop, 3-loop, 4-loop*), then the following guidelines apply:
 - a. No Volunteers - If no PWROG members are willing to volunteer their plant(s), the following is a list of progressive actions that can be taken:

- 1) Re-issue lead plant request letter
 - 2) Communicate the need for a lead plant to the appropriate TC/WG, MC and/or EC.
 - 3) Re-evaluate the need for a lead plant, i.e., can the PA go on without a lead plant.
 - 4) Postpone or cancel associated program
- b. Single Volunteer - If only one member has volunteered their plant, then that plant will be selected as the lead plant given that member can fulfill the lead plant expectations as follows:
- 1) The plant that would best demonstrate the process, technique, or methodology being developed.
 - 2) The plant that would best meet the lead plant expectations.
 - 3) The plant that could meet the program schedule.
 - 4) The plant for which the application of the process, technique, or methodology would be least costly to the PWROG. This would include the member's willingness to cost/resource share specific aspects of the PWROG PA, such as, analysis, documentation, licensing, third-party costs, and or NRC review fees.
 - 5) The plant that volunteered within the time frame in the request letter.

Any lead plant volunteers received *after* the time frame in the request letter, but before work has been initiated, will be give similar considerations as *multiple volunteers*. However, preference will be given to those plants that volunteered within the requested time frame. Any lead plant volunteers received after work has been initiated with the selected lead plant, will not be considered.

- c. Multiple Volunteers - If multiple members have volunteered their plant as a lead plant, the Steering Committee will select the lead plant based on the following considerations:
- 1) The plant that would best demonstrate the process, technique, or methodology being developed.
 - 2) The plant that would best meet the lead plant expectations.
 - 3) The plant that could meet the program schedule.
 - 4) The plant for which the application of the process, technique, or methodology would be least costly to the PWROG. This would include the member's willingness to cost/resource share specific aspects of the PWROG PA, such as, analysis, documentation, licensing, third-party costs, and or NRC review fees.

- 5) The plant that volunteered within the time frame in the request letter.
- 6) The overall benefit, if any, of selecting more than one lead plant.

Based on these and other considerations deemed appropriate by the SC, the SC will select a lead plant. Once a lead plant has have been selected, the PMO will issue a letter identifying the lead plant.

D. Lead Plant Expectations

1. The lead plant utility will be expected to work with Westinghouse or FRAMATOME throughout the course of the associated PWROG PA. Although lead plant expectations will be dependent on various aspects of the program, the following general expectations are provided:
 - a. Be a US B&W, W, or CE NSSS plant.
 - b. Be able to implement the new process, technique, or methodology being developed and pursue NRC approval if required.
 - c. Have personnel available to support the program consistent with the program schedule.
 - d. Provide a single point of contact whose responsibilities would include:
 - 1) Review overall program/Project Authorization,
 - 2) provide plans for implementing the new process, technique, or methodology,
 - 3) Participate in program management via meetings, resource planning and scheduling,
 - 4) Interface and provide support/reviews from various plant departments (chemistry, operations, fuels, analysis, materials, licensing, etc.) as necessary,
 - 5) Obtain plant specific data, reports, procedures, drawings, etc, needed to support the program, and
 - 6) Review draft and final PA report.
 - e. Provide a single point of contact, if different than above, to serve as the utility interface with the NRC if program involves NRC review and approval.
 - f. Prepare and submit a plant specific Licensing Amendment Request (LAR) if necessary.
2. In addition to these general expectations, PA-specific expectations/requirements should also be provided. Example are:
 - a. Utilizing Westinghouse fuel
 - b. Utilizing FRAMATOME analysis methods
 - c. Have an up-to-date PRA/IPE.

E. Cost / Resource Sharing

1. Prior to significant work being initiated on any program involving a lead plant, cost/resource sharing arrangements should be agreed upon between the lead plant utility and the PWROG. The following areas, with typical sharing arrangements, need to be agreed upon:
 - a. Generic Analysis - The PWROG is responsible for the generic analysis that needs to be performed. This involves developing and documenting the new process, technique, or methodology.
 - b. Lead Plant Specific Analysis - The lead plant utility is responsible for the lead plant specific analysis. Considerations that could impact this arrangement are:
 - 1) The amount of lead plant specific analysis required is significantly more compared to the amount of plant specific work that would be required for other plants to implement the new process, technique, or methodology especially if the program involves NRC review.
 - 2) The amount of lead plant specific analysis required is significantly more compared to the amount of generic work required.
 - c. Generic Topical Report Submittal
 - 1) The owners group is responsible for developing and submitting the Topical Report.
 - 2) The lead plant utility is responsible for participating in the review of the Topical Report.
 - 3) The resulting Topical Report may or may not be included the lead plant specific analysis. If the lead plant analysis is to be included in the Topical Report, the lead plant utility is responsible for providing the necessary input.

F. Lead Plant Submittal

1. The lead plant utility is responsible for developing the plant specific submittal/Licensing Amendment Request.
2. If defined as part of the program, the PWROG will provided limited assistance to the lead plant utility in developing and reviewing the lead plant submittal.

G. NRC Review Fees

1. The owners group pays for the NRC review fees associated with the generic submittal. Lead plants can consider requesting Non-funding participation.
2. The lead plant utility pays for the NRC review fees associated with the plant specific submittal.

H. RAI Responses

1. The PWROG pays for efforts to respond to Request for Additional Information (RAI) that are associated with the generic submittal.
2. The lead plant utility pays for efforts to respond to RAIs that are associated with the lead plant submittal unless the RAIs are generic.

I. Exceptions

1. The above arrangements are typical for most lead plant programs. These arrangements are subject to negotiations between the Westinghouse Owners Group and the lead plant utility depending on the aspects of the lead plant program, expected NRC review costs, lead plant submittal costs, and program benefits to the lead plant. Other considerations for the cost/resource sharing negotiations are:
 - a. Lead plant utility providing the PWROG with copies electronic files of documents specifically developed to support the lead plant analysis.
 - b. Trade-off lead plant cost/resources against the lead plant utility's cost share of the program.

J. Memorandum of Understanding

1. For lead plant PAs that in involve significant cost and resources, it is suggested that a Memorandum Of Understanding (MOU) be prepared detailing the cost/resource sharing arrangements, signed by both the lead plant utility and the PWROG.

XVI. Mission Statements

Mission Statements are controlled by the Steering Committee and are located on each committee's webpage.