

The following topics will be discussed:

A. *ACNW Planning and Procedures*—The Committee will hear a briefing from its staff on issues to be covered during this meeting. The Committee will also consider topics proposed for future consideration by the full Committee and Working Groups. The Committee will discuss ACNW-related activities of individual members.

B. *Review Activities Underway at the Center for Nuclear Waste Regulatory Analyses (CNWRA)*—The Committee will review activities underway at the CNWRA. Discussions will include an overview of the Center, including its historical evolution. Each of the 10 high-level waste key technical issues (KTIs) will be reviewed with special emphasis placed on four KTIs: Igneous Activity, Evolution of the Near-Field, Repository Design and Thermal Mechanical Effects, and Container Life and Source Term.

C. *Laboratory Tours*—The Committee will visit a number of experiments underway at the Center involving: hydrology and thermal-hydrology, geochemistry and radionuclide transport, structural geology modeling, and materials performed.

D. *Yucca Mountain Environmental Impact Statement*—The Committee will review the staff's plans for reviewing the Department of Energy's Draft Environmental Impact Statement for the Yucca Mountain project.

E. *Total-System Performance Assessment (TPA) Code 3.2 Sensitivity Study*—The Committee will review the results of the system level sensitivity and uncertainty analyses to determine the parameters that have the most influence on repository performance.

F. *Defense In-Depth*—The NRC staff and the CNWRA will discuss the current concept of defense in-depth as it applies to a high-level waste repository.

G. *Environmental Protection Agency (EPA) Yucca Mountain Site Specific Standards (tentative)*—The Committee may offer comments to the Nuclear Regulatory Commission on EPA's Yucca Mountain site specific standard 40 CFR part 191 should the proposed standard be made publicly available. The timing for release of the standard remains uncertain.

H. *Preparation of ACNW Reports*—The Committee will discuss planned reports on the following topics: a White Paper on Repository Design Issues at Yucca Mountain and other topics discussed during this and previous meetings as the need arises.

I. *Miscellaneous*—The Committee will discuss miscellaneous matters related to

the conduct of Committee activities and organizational activities and complete discussion of matters and specific issues that were not completed during previous meetings, as time and availability of information permit.

Procedures for the conduct of and participation in ACNW meetings were published in the **Federal Register** on September 29, 1998 (63 FR 51967). In accordance with these procedures, oral or written statements may be presented by members of the public, electronic recordings will be permitted only during those portions of the meeting that are open to the public, and questions may be asked only by members of the Committee, its consultants, and staff. Persons desiring to make oral statements should notify the Associate Director for Technical Support, ACNW, Dr. Richard P. Savio, as far in advance as practicable so that appropriate arrangements can be made to schedule the necessary time during the meeting for such statements. Use of still, motion picture, and television cameras during this meeting will be limited to selected portions of the meeting as determined by the ACNW Chairman. Information regarding the time to be set aside for taking pictures may be obtained by contacting the Associate Director for Technical Support, ACNW, prior to the meeting. In view of the possibility that the schedule for ACNW meetings may be adjusted by the Chairman as necessary to facilitate the conduct of the meeting, persons planning to attend should notify Dr. Savio as to their particular needs.

Further information regarding topics to be discussed, whether the meeting has been canceled or rescheduled, the Chairman's ruling on requests for the opportunity to present oral statements and the time allotted therefor can be obtained by contacting Dr. Richard P. Savio, Associate Director for Technical Support, ACNW (Telephone 301/415-7363), between 8:00 a.m. and 5:00 p.m. EDT.

ACNW meeting notices, meeting transcripts, and letter reports are now available for downloading or reviewing on the internet at <http://www.nrc.gov/ACRSACNW>.

Dated: May 27, 1999.

Andrew L. Bates,

Advisory Committee Management Officer.
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NUCLEAR REGULATORY COMMISSION

Proposed Revision to Standard Review Plan (NUREG-0800), Chapter 13, "Conduct of Operations, Sections 13.1.1, "Management and Technical Support Organization," and 13.1.2-1.3, "Operating Organization"

AGENCY: Nuclear Regulatory Commission.

ACTION: Notice of opportunity for public comment.

SUMMARY: The Nuclear Regulatory Commission (NRC) has prepared a revision to NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants—LWR Edition," Chapter 13, "Conduct of Operations," sections 13.1.1, "Management and Technical Support Organization," and 13.1.2-1.3, "Operating Organization." The Standard Review Plan (SRP) contains guidance used by the staff to review safety analysis reports for light water reactor commercial nuclear power plants. The proposed revision incorporates changes that have been made since the sections were last revised in April, 1996, and publically noticed in the **Federal Register**, Vol. 61, No. 162, Tuesday, August 20, 1996. There were no public comments received to these sections. The proposed revision addresses 10 CFR 50.80 requirements for "Transfer of Licenses." Specifically, the staff has revised Chapter 13, "Conduct of Operations," sections 13.1.1, "Management and Technical Support Organization," and 13.1.2-1.3, "Operating Organization" of the SRP as they relate to 10 CFR 50.80 requirements for the applicant's technical qualifications. The April, 1996 revision of these SRP sections did not include guidance for the staff to review the technical qualifications of applicants for license transfer.

The purpose of this notice is to solicit specific public comment on whether the revised text accurately and fully reflects the established NRC staff positions and existing regulations. The SRP is made available to the public as part of the NRC's policy to inform the nuclear industry and the general public of regulatory procedures and policies. The SRP is not a substitute for regulatory guides or NRC regulations. Compliance with the SRP is not required. The published SRP will be revised periodically, as appropriate, to accommodate comments and reflect new information and experience. The NRC encourages comment from all interested parties; however, public

review is not intended to reopen a dialogue on the merits of the requirements themselves but, rather, should be focused on the previously stated purpose.

DATES: The comment period expires July 6, 1999. Comments received after this date will be considered if it is practical to do so, but the Commission is able to assure consideration only for comments received on or before this date.

ADDRESSES: Mail comments to: Chief, Rules Review and Directives Branch, Division of Freedom of Information and Publications Services, Mail Stop T-6D59, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001. Comments may be hand delivered to 11545 Rockville Pike, Maryland, between 7:45 a.m. and 4:15 p.m., on Federal workdays.

FOR FURTHER INFORMATION CONTACT: James P. Bongarra, Jr., U.S. NRC, Office of Nuclear Reactor Regulation, Mail Stop O9D24, Washington, DC, 20555; telephone (301) 415-1046; e-mail: jxb@nrc.gov.

SUPPLEMENTARY INFORMATION: The proposed revised text to NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants—LWR Edition," is the work of the NRC staff. It has received review by the Director, Division of Inspection Program Management, Office of Nuclear Reactor Regulation, and the NRC's Office of General Counsel. A final revision will be published upon resolution of public comments and review by the Director, Office of Nuclear Reactor Regulation, the NRC's Committee to Review Generic Requirements (CRGR), and the Advisory Committee on Reactor Safeguards (ACRS).

The proposed revision to NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants—LWR Edition," Chapter 13, "Conduct of Operations," sections 13.1.1, "Management and Technical Support Organization," and 13.1.2-1.3, "Operating Organization," follows:

NUREG-0800—Standard Review Plan, Chapter 13, Conduct of Operations

13.1.1 Management and Technical Support Organization

Review Responsibilities

Primary—Human Performance Branch
Secondary—None

I. Areas of Review

The branch with primary responsibility for reviewing human performance will review the corporate

level management and technical organization of the applicant for a construction permit (CP), operating license (OL), combined license (COL), or license transfer. The review will also include the applicant's major contractors including the nuclear steam supply system (NSSS) vendor, and architect/engineer (A/E) for the project. The technical resources to support the nuclear power plant design, construction, testing, and operation are reviewed. The review for a CP or COL will include an examination of the responsibilities, technical staff, interface arrangements, and management controls used to ensure that the design and construction of the facility will be performed in an acceptable manner. The review for an OL or COL will examine the applicant's corporate organization and technical staff that will provide support for safe plant operation. The review for license transfer will examine the acceptability of any changes to the technical organization or personnel qualifications proposed as a result of a license transfer under 10 CFR 50.80.

The objective of this review is to ensure that the corporate management is involved with, informed of, and dedicated to the safe design, construction, test and operation of the nuclear plant. In addition, the review is to ensure that sufficient technical resources have been, are being and will continue to be provided to adequately accomplish these objectives.

A. Reviews of Initial Construction Permit (CP) and Early Stage Combined License (COL) or Reviews of Transfer of Construction Permits (CP) and Early Stage Combined License (COL)

The applicant's past experience in the design and construction of nuclear power plants, and past experience in activities of similar scope and complexity should be described. The applicant's management, engineering, and technical support organization should also be described. The description should include organizational charts for the current headquarters and engineering structure, as well as planned modifications and additions to those organizations to reflect the added functional responsibilities associated with the nuclear plant.

1. Design and Construction Responsibilities

A description of the implementation or delegation of design and construction responsibilities should be included for the following:

a. Principal site-related engineering work such as meteorology, geology,

seismology, hydrology, demography, and environmental effects.

b. Design of plant and ancillary systems, including fire protection systems.

c. Review and approval of plant design features, including human factors engineering (HFE) considerations.

d. Site layout with respect to environmental effects and security provisions.

e. Development of safety analysis reports (SARs).

f. Material and components specification review and approval.

g. Procurement of materials and equipment.

h. Management of construction activities.

2. Preoperational Responsibilities

A description of the proposed plans for the management organization related to the initial test program should include the following:

a. Development of plans for the preoperational and startup testing of the facility.

b. Development and implementation of staff recruiting and training programs.

c. Development of plant maintenance programs.

The descriptions of the design and construction and preoperational responsibilities should include the following:

a. How these responsibilities are assigned by the headquarters staff and implemented within the organizational units;

b. Identification of the responsible working or performance level organizational unit;

c. An estimate of the number of persons expected to be assigned to each of the various units with responsibility for the project;

d. The general educational backgrounds and experience requirements for qualification in identified positions or classes of positions;

e. The role of the applicant's management in interfacing with the NSSS and A/E organizations;

f. Specific educational and experience background for assigned management and supervisory positions; and

g. The required review of contractor work by the applicant's staff.

h. For identified positions or classes of positions that have functional responsibilities other than the CP or COL application, the expected proportion of time assigned to the other activities should be described.

i. The early plans for providing technical support for the operation of the facility should be described.

The CP- or COL-stage review of the NSSS and A/E organizations includes an evaluation of the ability of the technical staff of each organization to support or perform the activities specified in the application, as applicable. The information submitted should include a description of the specific activity (including scope) to be engaged in, organizational description and charts reflecting organizational lines of authority and responsibility for the project, the number of persons assigned to the project, and qualification requirements for principal management positions related to the project. For those NSSS and A/E organizations with extensive experience, a detailed description of this experience may be provided in lieu of the details of their organization as evidence of technical capability. However, a specific description should be provided of how this experience will be applied to the particular project.

B. Operating License (OL and COL) Reviews

The SAR should provide the following information:

1. Organizational charts of the applicant showing the corporate level management and technical support;
2. The relationship of the nuclear oriented portions of the structure to the rest of the corporate organization;
3. A description of the specific provisions which have been made for technical support for operations; and
4. The organizational unit and any augmenting organizations, or other personnel who will manage or execute any phase of the test program, including the responsibilities and authorities of principal participants.

Technical services and backup support for the operating organization should become available in advance of the conduct of the preoperational and startup testing program and continue throughout the life of the plant.

The SAR should (1) Describe approximate numbers, educational background, and experience requirements for each identified position or class of positions providing technical support for plant operations, and (2) include specific educational and experience background for individuals holding the management and supervisory positions providing support in the areas identified below.

The special capabilities that should be included in the support for the operation of the plant are:

1. Nuclear, mechanical, structural, electrical, thermal-hydraulic, metallurgical and materials, and

instrumentation and controls engineering.

2. Plant chemistry.
3. Health physics.
4. Fueling and refueling operations support.
5. Maintenance support.
6. Operations support.
7. Quality assurance.
8. Training.
9. Safety review.
10. Fire protection.
11. Emergency organization.
12. Outside contractual assistance.

C. Reviews of Transfer of Operating License (OL) and Late Stage Combined License (COL)

An applicant for transfer of an operating license should provide a description of the organization to support plant operations. The description should include:

1. Organizational charts showing the corporate level management and technical support organization and emphasizing the changes to be made as a result of the transfer;
2. The relationship of the nuclear oriented portions of the organization to the rest of the corporate organization; and
3. A description of the specific provisions which have been made for technical support for operations.

D. Review Interfaces

The branch with primary responsibility for human performance reviews performs the following reviews under the SRP sections indicated:

- SRP Sections 13.1.1 through 13.1.3—for organizational structure, personnel qualifications and experience
- SRP Section 13.2.1—for training for licensed operators
- SRP Section 13.4—for organizational provisions for independent reviews and verifications
- SRP Section 13.5.2—for procedure adequacy
- SRP Section 18.0—for use of human factors engineering principles

The branch with primary responsibility for human performance will coordinate evaluations and reviews by other branches that interface with the overall review of the management and technical support organization as follows:

1. With the branch responsible for Emergency Preparedness and Radiation Protection, as part of its primary review responsibility for SRP section 13.3, for the acceptability of the emergency organization and as part of its primary review responsibilities for SRP section 12.5, for the acceptability of the radiation protection organization.

2. With the branch responsible for Safeguards as part of its primary review responsibility for SRP section 13.6 for the acceptability of the applicant's plans and provisions for security, including the security organization.

3. With the branch responsible for Quality Assurance, as part of its primary review responsibility for SRP chapter 17, for the acceptability of the quality assurance organization and, as part of its primary review responsibilities for SRP section 13.4, for the acceptability of the organization of the independent safety engineering group (ISEG).

4. With the branch responsible for Plant Systems, as part of its primary review responsibility for SRP section 9.5.1, for the acceptability of the organization responsible for fire protection.

For those areas of review identified above as being part of the review under other SRP sections, the acceptance criteria necessary for the review and their methods of application are contained in the referenced SRP sections.

II. Acceptance Criteria

A. General Guidance

The applicant's description of its resources to deal with safety-related problems connected with the proposed addition of nuclear generating capacity should provide contributory evidence as to the technical qualifications of the applicant, as required by 10 CFR 50.40(b) and 10 CFR 50.80, as applicable.

In the review and evaluation of the subject matter of this section of the SAR, the following points should be taken into consideration.

1. The corporate level management and technical support structure, as demonstrated by organizational charts and descriptions of functions and responsibilities, should be free of ambiguous assignments of primary responsibility.

2. A corporate officer should be clearly responsible for nuclear activities, without having ancillary responsibilities that might detract attention to nuclear safety matters.

3. Design and construction responsibilities should be reasonably well defined in both numbers and experience of persons required to implement their responsibilities.

4. Similarly, management and organizational responsibilities should be clearly defined with regard to human factors engineering (HFE) considerations in the management of human-system interface issues. This subject is addressed in more detail in NUREG-

0711 and in SRP Chapter 18 (DRAFT, April 1996).

B. Specific Criteria

Specific criteria which contribute to meeting 10 CFR 50.40(b) with respect to the CP, OL, or COL reviews and 10 CFR 50.80 with respect to license transfer reviews are described below.

For Review of Initial Construction Permit (CP) and Early Stage Combined License (COL) or for Review of Transfer of Construction Permit (CP) and early Stage Combined License (COL)

1. The applicant has identified and functionally described the specific organizational groups responsible for implementing responsibilities for the project.
2. The applicant has described the method of implementing its responsibilities for dealing with the safety-related aspects of the design and construction of the project and the transition to operation of the facility, including control of major contractors.
3. Clear, unambiguous management control and communications exist between the organizational units involved in the design and construction of the project.
4. Substantive breadth and level of experience and availability of manpower exist to implement the responsibility for the project.
5. The applicant has clearly described the role and function of the A/E and NSSS vendor during both design and construction and has demonstrated appropriate control over the project-related activities of the A/E and NSSS vendor.
6. The applicant has designated the responsible organizations that will participate in the test program and early plans indicate reasonable assurance that such designated organizations can collectively provide the necessary level of staffing with suitable skills and experience to develop and conduct the test program.
7. The applicant plans to utilize the plant operating and technical staff in the development and conduct of the test program and in the review of test results.
8. For COL applicants subject to 10 CFR 50.34(f), the applicant has identified plans for the organization and staffing to oversee design and construction of the nuclear facility in accordance with the guidelines of Item II.J.3.1 of NUREG-0718 as related to the requirements of 10 CFR 50.34(f)(3)(vii). As reflected in SRP Section 18.0, (DRAFT, April 1996) the review criteria for the human factors engineering (HFE) design team is provided in NUREG-

0711, Chapter 2, "Element 1—HFE Program Management."

Although the requirements of 10 CFR 50.34(f) apply only to the specific applicants listed in that section, OL applicants should include information related to the organizational and management structure responsible for the design and construction of the proposed plant to ensure that the staff has complete and accurate information for its review.

For Review of Operating License (OL) and Later Stage Combined License (COL)

The review and evaluation of management and technical organizational structure for OL and COL applicants is based on the guidelines of TMI Action Plan Item I.B.1.2 originally described in NUREG-0694. Specific criteria are as follows:

1. The applicant has identified and described the organizational groups responsible for implementing the initial test program, and technical support for the operation of the facility.
2. The applicant has described the method of implementing its responsibilities for dealing with the initial test program, technical support, and operation of the facility.
3. The organizational structure provides for the integrated management of activities that support the operation and maintenance of the facility.
4. Clear management control and effective lines of authority and communications exist between the organizational units involved in the management, operation, and technical support for the operation of the facility.
5. Substantive breadth and level of experience and availability of manpower exist to implement the initial test program and technical support for the operation of the facility. The need to supplement the corporate structure with additional experienced personnel for the initial years of operation will be determined on case-by-case basis.
6. Qualifications of members of the technical support organization should meet or exceed those endorsed by Regulatory Guide 1.8.
7. The technical staff will be utilized in the initial test program to the maximum extent practicable. Participants in the test program should receive plant-specific training/ indoctrination in the administrative controls for the test program prior to the start of testing. The level of staffing should be adequate based on the reviewer's judgment.

For Review of Transfer of Operating License (OL) and Later Stage Combined License (COL)

The criteria for the review and evaluation of management and technical organizational structure for license transfer applicants are as follows:

1. The applicant has identified and described the organizational groups responsible for the technical support for the operation of the facility.
2. The applicant has described the method for implementing the technical support and operation of the facility.
3. The organizational structure provides for the integrated management of activities that support the operation and maintenance of the facility.
4. Clear management control and effective lines of authority and communications exist between the organizational units involved in the management, operation, and technical support for the operation of the facility.
5. Substantive breadth and level of experience and availability of manpower exist to implement the technical support for the operation of the facility.
6. Qualifications of members of the technical support organization should meet or exceed those endorsed by Regulatory Guide 1.8.

C. Technical Rationale

The technical rationale for application of the above acceptance criteria to the review of the management and technical support organization is discussed in the following paragraphs.

1. Compliance with the relevant requirements of 10 CFR 50.40(b) requires that the applicant be technically qualified to engage in activities associated with the design, construction, and operation of a nuclear power plant in accordance with the regulations in 10 CFR 50. Similarly, 10 CFR 80 requires that the applicant for the transfer of a license be technically qualified to be the holder of the license.
- The management and technical support organization established by the applicant to oversee the design and construction of a nuclear power plant provides valuable insight into the corporate management's understanding of its safety role in the design, construction, operation, and maintenance of the facility. This information contributes to the determination that an applicant is technically qualified by ensuring that appropriate considerations were used in the establishment of general qualification requirements and staffing levels for all key positions on which the safety of the facility will depend.

Meeting the requirements of 10 CFR 50.40(b) and 10 CFR 80, as applicable, provides assurance that the applicant is technically qualified to engage in the proposed activities and has established the necessary management and technical support organization to safely operate the proposed facility.

III. Review Procedures

Preparation for reviewing the application should include familiarization with the documents listed as references in this SRP section.

Each element of the application information is to be reviewed against this SRP section. The reviewer's judgment during the review is to be based on an inspection of the material presented, whether items of special safety significance are involved, and the magnitude and uniqueness of the project. Any exceptions or alternatives are to be carefully reviewed to ensure that they are clearly defined and that an adequate basis exists for acceptance.

The applicant should identify the applicable version of references, Regulatory Guides, and Codes and Standards used. The reviewer should identify the applicable version of references, Regulatory Guides, and Codes and Standards used in the review.

In the review and evaluation of the information related to this section of the management and technical support organization, the following points should be taken into consideration:

A. In the early construction stage, the applicant's plans for headquarters staffing to provide technical support when operating may not yet be firm. It is acceptable, therefore, if these plans are not fully specific in terms of numbers of people, provided the commitment made is sufficiently firm to ensure the responsibility can be met.

B. The reviewer must recognize that there are many acceptable ways to define and delegate job responsibilities. Variations in staffing may also be expected between applicants with and without prior experience in nuclear plant design, construction, or operation. The reviewer must be convinced that an applicant has not underestimated the magnitude of the task. The reviewer should be alert to the possibility that excessive workloads may be placed upon too small a number of individuals. Interface arrangements and controls between the applicant and major contractors (NSSS vendors, architect/engineers, constructors) should be examined to ensure that the applicant will be in charge of and responsible for design and construction activities.

If the application involves the addition of more than one unit, the reviewer should ensure that headquarters staffing plans take this fact into account. This is particularly important if additional units are scheduled to come on line at intervals of about one year or less, since the shakedown period for the operation of a new plant can be expected to produce quite heavy workloads. In some of these cases the applicant may plan to bolster the plant staff organization during such periods so that it is necessary to evaluate headquarters staffing plans in conjunction with those for the plant staff organization.

C. The reviewer should assess the degree of participation during the design and construction phases by the headquarters group that typically has plant operating (generating) responsibility. Interfaces between such a group and those with project engineering responsibilities should be examined.

D. At the time of this review, if the applicant has had experience in the operation of a previously licensed nuclear power plant, the reviewer may seek independent information about headquarters staffing and qualifications through the appropriate NRC Regional Office.

The review procedure for this section consists, therefore, of the following:

1. An examination of the information submitted to determine that all areas identified in subsection I, "Areas of Review," above have been addressed.

2. A comparison of the information with the acceptance criteria of subsection II, Review Criteria," above.

3. Review of information provided by the NRC Regional Office position statement on the applicant's organizational and administrative commitments made in the SAR, if applicable.

4. Verification of the implementation of the management structure and technical resources based on visits to corporate headquarters and the site, if applicable.

The reviewer then determines, based on the foregoing, the overall acceptability of the applicant's management and technical support organization and staffing plans.

For OL and late stage COL license transfer under 10 CFR Part 50, the existing organization was found acceptable for operations as part of the initial licensing review. Therefore, the review in support of a license transfer should be focused on the organizational changes proposed as a result of that transfer. The reviewer should ensure that the proposed changes will result in

an organization that will continue to meet the relevant review criteria.

For Standard Design Certification under 10 CFR Part 52, the procedures above should be followed, as modified by the procedures in SRP Section 14.3, (DRAFT, April 1996) to verify that the design set forth in the standard safety analysis report, including inspections, tests, analysis, and acceptance criteria (ITAAC), site interface requirements and combined license action items, meet the acceptance criteria given in subsection II. SRP Section 14.3 (DRAFT, April 1996) contains procedures for the review of certified design material (CDM) for the standard design, including the site parameters, interface criteria, and ITAAC.

IV. Evaluation Findings

The reviewer verifies that the information presented supports conclusions of the following type to be used in the staff's safety evaluation report:

The staff concludes that the management and technical support organization is acceptable and meets the requirements of 10 CFR 50.40. This conclusion is based on the following:

A. For a Safety Evaluation Report of an Initial CP or COL or for a Transfer of CP or COL

The applicant has described clear responsibilities and associated resources for the design and construction of the facility and has described its plans for management of the project and for utilization of the NSSS vendor and A/E. These plans have been reviewed and give adequate assurance that an acceptable organization has been established and that sufficient resources are available to satisfy the applicant's commitments for the design and construction of the facility. These findings contribute to the judgment that the applicant complies with the requirements of 10 CFR 50.40(b) and 10 CFR 50.80, as applicable; i.e., that the applicant is technically qualified to engage in design and construction activities.

B. For a Safety Evaluation Report of an Initial OL or Late Stage COL

The applicant has described its organization for the management of, and its means for providing technical support for the plant staff during operation of the facility. These measures have been reviewed and it is concluded that the applicant has an acceptable organization and adequate resources to provide offsite technical support for the operation of the facility under both normal and off-normal conditions.

C. For a Safety Evaluation Report of a Transfer of an OL or Late Stage COL License

The applicant has described its organization for the management of, and its means for providing technical support to the plant staff for operation of the facility after the license transfer. These measures have been reviewed and it is concluded that the applicant has an acceptable organization and adequate resources to provide offsite technical support for the operation of the facility under both normal and off-normal conditions.

D. For Design Certification

For design certification reviews, the findings will also summarize, to the extent that the review is not discussed in other safety evaluation report sections, the staff's evaluation of inspections, tests, analyses, and acceptance criteria (ITAAC), including design acceptance criteria (DAC), site interface requirements, and combined license action items that are relevant to this SRP section.

In addition to the finding based on the type of application, the safety evaluation report should also address the following:

These findings contribute to the judgment that the applicant complies with the requirements of 10 CFR 50.40(b) and 10 CFR 50.80, as applicable (that the applicant is technically qualified to operate a nuclear power plant); that the applicant will have the necessary managerial and technical resources to provide assistance to the plant staff in the event of an emergency; and that the applicant has identified the organizational positions responsible for fire protection matters and the authorities that have been delegated to these positions to implement fire protection requirements.

V. Implementation

The following is intended to provide guidance to applicants and licensees regarding the NRC staff's plans for using this SRP section.

This SRP section will be used by the staff when performing safety evaluations of license applications submitted by applicants pursuant to 10 CFR 50 or 10 CFR 52 and for transfer of a license pursuant to 10 CFR 50.80. Except in those cases in which the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the method described herein will be used by the staff in its evaluation of conformance with Commission regulations.

The provisions of this SRP section apply to reviews of applications docketed six months or more after the date of issuance of this SRP section.

Implementation schedules for conformance to parts of the method discussed herein are contained in the referenced regulatory guides and NUREGs.

VI. References

- 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."
- Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants."
- Regulatory Guide 1.68, "Initial Test Programs for Water-Cooled Nuclear Power Plants."
- NUREG-0694, "TMI-Related Requirements for New Operating Licenses."
- NUREG-0711, Human Factors Engineering Program Review Model.
- NUREG-0718, "Licensing Requirements for Pending Applications for Construction Permits and Manufacturing License."
- NUREG-0737, "Clarification of TMI Action Plan Requirements."

NUREG-0800—Standard Review Plan, Chapter 13, Conduct of Operations

13.1.2–13.1.3 Operating Organization

Review Responsibilities

Primary—Human Performance Branch
Secondary—None

I. Areas of Review

The applicant's operating organization, as described in its safety analysis report (SAR), is reviewed. This section of the SAR should describe the structure, functions, and responsibilities of the onsite organization established to operate and maintain the plant.

A. Reviews of Initial Construction Permit (CP) and Early Stage Combined License (COL) or Reviews or Transfer of CP and Early Stage COL

During the early stages of construction or plant design it is recognized that many details of the plant organization and staffing have not been finalized. The organizational information provided at this time should include the following elements:

- The applicant's commitment to meet the guidelines of Regulatory Guide 1.33 for the Operating Organization.
- The applicant's commitment to meet the guidelines of Regulatory Guide 1.33 for Onsite Review and Rules of Practice.
- The applicant's commitment to meet Branch Technical Position SPLB 9.5-1.
- The applicant's commitment to meet the guidelines of Regulatory Guide 1.8 for the Operating Organization.

5. The applicant's commitment to be consistent with the options in the Commission Policy Statement on Engineering Expertise on Shift.

6. The applicant's commitment to meet TMI Action Plan items I.A.1.1 and I.A.1.3 of NUREG-0737 for Shift Technical Advisor and Shift Manning.

7. A schedule, relative to fuel loading for each unit, for filling all positions.

B. Review of Operating License (OL) and Later Stage Combined License (COL)

During the later stages of construction, plant design, and licensing, the applicant should provide evidence that the initial personnel selections conform to the commitments made in the early stages of licensing.

The organizational information provided by the applicant should include the following elements:

- An organization chart should have the following elements:
 - The title of each position,
 - The minimum number of persons to be assigned to common or duplicated positions,
 - The number of operating shift crews, and
 - The positions for which reactor operator and senior reactor operator licenses are required.

For multi-unit stations, the organization chart (or additional charts) should clearly reflect changes and additions as new units are added to the station.

2. The personnel resumes for those selected for management and supervisory positions down through the shift supervisor.

3. The functions, responsibilities, and authorities of plant positions corresponding to the following should be described:

- Overall plant management.
- Operations supervision.
- Operating shift crew supervision.
- Shift technical advisors.
- Licensed operators.
- Non-licensed operators.
- Technical supervision.
- Radiation protection supervision.
- Instrumentation and controls maintenance supervision.
- Equipment maintenance supervision.
- Fire protection supervision.
- Quality assurance supervisor (when part of the plant staff).

For each position, where applicable, required interfaces with offsite personnel or positions identified in SAR Section 13.1.1 should be described. Such interfaces include defined lines of reporting responsibilities, e.g., from the plant manager to the immediate

superior, as well as functional or communication channels.

4. The line of succession of authority and responsibility for overall station operation in the event of unexpected contingencies of a temporary nature, and the delegation of authority that may be granted to operating supervisors and to shift supervisors, including the authority to issue standing or special orders.

5. The extent and nature of the participation of the plant operating and technical staff in the initial test program.

6. If the station contains or is planned to contain power generating facilities other than those relating to the application in question and including fossil-fueled units, this section should also describe interfaces with the organizations operating such other facilities. The description should include any proposed sharing of persons between the units, a description of their duties, and the proportion of their time they will routinely be assigned to non-nuclear units

7. The position titles, applicable operator licensing requirements for each, and the total number of people planned to man each shift should be described for all combinations of units proposed to be at the station in either operating or cold shutdown modes. Shift crew staffing plans unique to refueling operations should be described. The proposed means of assigning shift responsibility for implementing the radiation protection and fire protection programs on a round-the-clock basis should also be described.

8. The education, training, and experience requirements (qualification requirements) established by the applicant for filling each management, operating, technical, and maintenance position category in the operating organization above should be described. This includes those persons who will conduct preoperational and startup tests. Consequently, the information to be reviewed should demonstrate an understanding of and commitment to the acceptance criteria below.

C. Review of a Transfer of Operating License (OL) or Late Stage Combined Operating License (COL)

The initial operating organization was found acceptable as part of the initial licensing review. Subsequent safety-related changes to the operating organization should have been evaluated with an appropriate methodology and, therefore, the existing organization remains acceptable. The review to support a license transfer

should focus on evaluating any changes to the operating organization that are being proposed as a result of the transfer.

D. Review Interfaces

The primary Human Performance review branch performs the following reviews under the SRP sections indicated:

SRP Sections 13.1.1 through 13.1.3,—for organizational structure, personnel qualifications and experience
SRP Section 13.2.1—for training for licensed operators

SRP Section 13.4—for organizational provisions for independent reviews and verifications

SRP Section 13.5.2—for procedure adequacy

SRP Section 18.0—for use of human factors engineering principles

The primary Human Performance review branch will coordinate evaluations and reviews by other branches that interface with the overall review of the operating organization as follows:

1. With the branch responsible for Emergency Preparedness and Radiation Protection, as part of its primary review responsibility for SRP Section 13.3, for the acceptability of the emergency organization and as part of its primary review responsibilities for SRP Section 12.5, for the acceptability of the radiation protection organization.

2. With the branch responsible for Safeguards as part of its primary review responsibility for SRP Section 13.6 for the acceptability of the applicant's plans and provisions for security, including the security organization.

3. With the branch responsible for Quality Assurance, as part of its primary review responsibility for SRP Chapter 17, for the acceptability of the quality assurance organization.

For those areas of review identified above as being part of the review under other SRP sections, the acceptance criteria necessary for the review and their methods of application are contained in the referenced SRP sections.

II. Acceptance Criteria

A. General Criteria

This section of the SAR should demonstrate the applicant's commitment to and implementation of plans to staff the onsite operating organization and to define and delegate responsibilities to provide assurance that the plant can be operated safely.

In the review and evaluation of the subject matter in this section of the SAR, the following points should be taken into consideration:

1. Plant staff organizational structures are not rigidly fixed. However, experience has shown that certain components are common to and necessary for all plants. Among these are operational, onsite technical support, and maintenance groups, under the direction and supervision of a plant manager.

2. The operating organization should be free of ambiguous assignments of primary responsibility. Operating responsibilities should be reasonably well defined in both numbers and experience of persons required to implement their responsibilities.

3. The total on-shift manpower available should include a sufficient number of full operating shift crews so that excessive overtime is not routinely scheduled.

The staff acceptance criteria are designed to produce reasonable assurance of applicant compliance with the relevant requirements of the following regulations:

1. 10 CFR 50.40(b) as it relates to demonstrating in conjunction with other reviews that the applicant is technically qualified to engage in nuclear activities licensed under these regulations.

2. 10 CFR 50.54(j), (k), (l), and (m) as they relate to operator requirements during the operation of the facility, the responsibility for directing activities of licensed operators, and the senior operator availability during reactor operations and other specific reactor conditions or modes of operation.

3. 10 CFR 50.80 as it relates to demonstrating in conjunction with other reviews that the applicant for the transfer of a license is technically qualified to be the holder of a license.

B. Specific Criteria

Specific criteria necessary to meet the relevant requirements of 10 CFR 50.40(b), 10 CFR 50.80, and 10 CFR 50.54(j), (k), (l), and (m) as follows:

1. The requirements of ANSI N18.7/ANS-3.2, Section 3.4, "Operating Organization," as endorsed by Regulatory Guide 1.33, should be met. In addition, the following characteristics should be satisfied:

a. The reporting responsibility and authority of the functional areas of radiation protection, quality assurance, and training should ensure independence from operating pressures. In utilities with large commitments to nuclear power plants, overall management and technical direction in these areas may be concentrated at the home office.

b. There should be clear lines of authority to the Plant Manager.

c. Responsibility for all activities important to the safe operation of the facility should be clearly defined.

d. Distinct functional areas should be separately supervised and/or managed.

e. Sufficient managerial depth should be available to provide qualified backup in the event of the absence of the incumbent.

2. Responsibilities and authorities of operating organization personnel should conform to the requirements of ANSI N18.7/ANS-3.2, Section 5.2, "Rules of Practice"; Section 4.4, "Onsite Review," as endorsed by Regulatory Guide 1.33; Branch Technical Position SPLB 9.5-1; and Regulatory Guide 1.8 for the "Operating Organization." In addition, the organization should reflect the staff position in TMI Action Plan Item I.C.3 of NUREG-0694, by having the responsibilities of the shift supervisor clearly establish the command duties of that position and emphasize the primary management responsibility for the safe operation of the plant.

3. Assignments of onsite shift operating crews shall be made in accordance with 10 CFR 50.54(j), (k), (l), and (m). In addition, the staffing should reflect the staff positions of TMI Action Plan items I.A.1.1 and I.A.1.3 of NUREG-0737 as follows:

a. A shift supervisor with a senior reactor operator's license, who is also a member of the station supervisory staff, shall be onsite at all times when at least one unit is loaded with fuel.

b. In addition to the licensed personnel specified in 10 CFR 50.54(m), as a minimum, an auxiliary operator (non-licensed) shall be assigned to each reactor and an additional auxiliary operator shall be assigned for each

control room from which a reactor is operating. These operators shall be properly qualified to support the unit to which assigned.

Note: The shift composition described above is shown in tabular form in Table 1.

c. To meet TMI Action Plan item I.A.1.1 of NUREG-0737, engineering expertise shall be onsite at all times a licensed nuclear unit is being operated in Modes 1-4 for a PWR or in Modes 1-3 for a BWR. This engineering expertise should be consistent with the options presented in the Commission Policy Statement on Engineering Expertise on Shift.

d. A health physics technician shall be onsite at all times when there is fuel in a reactor.

e. A rad/chem technician shall be onsite at all times when a licensed nuclear unit is being operated in Modes 1-4 for a PWR or in Modes 1-3 for a BWR.

f. Assignment, stationing, and relief of operators and senior operators within the control room shall be as described in Regulatory Guide 1.114.

4. Total complement of licensed personnel and unlicensed personnel for on-site shift operating crews should be sufficient to avoid the routine heavy use of overtime.

Note: SRP Section 13.5.1 contains guidance on work hour limitations.

To meet this policy, staffing plans should provide for no less than the number required for five shift rotations.

5. The plant operating and technical staff should be used to the maximum extent possible in the facility initial test program.

6. Assignments of persons to implement the fire brigade requirements of the fire protection program should meet the guideline of SRP Section 9.5.1, including the following:

a. The responsibilities of the fire brigade members under normal conditions should not conflict with their responsibilities during a fire emergency.

b. The minimum number of fire brigade members available onsite for each shift operation crew should be consistent with the activities required to combat the most significant fire. The minimum size of the fire brigade shift should be five persons unless a specific site evaluation has been completed and some other number justified.

7. Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," sets forth the staff position on plant personnel qualifications and training.

In addition, although the qualification levels of the standards are endorsed as acceptable minimums for each position, it is expected that the collective qualifications of the plant staff will be greater than the sum of the minimum individual requirements described in the standard, particularly in the area of nuclear power plant experience and in supervisory and management positions involved in the operational aspects of the facility. In those cases where the collective qualifications do not exceed the sum of the minimums for individual positions, additional technical support for the plant staff may be required. These will be determined on a case-by-case basis.

TABLE 1

	Shift Staffing**		
	One unit, one control room	Two units, one control room	Two units, two control rooms
One Unit Operating*	1 SS (SRO) 1 SRO 2 RO 2 AO	1 SS (SRO) 1 SRO 3 RO 3 AO	1 SS (SRO) 1 SRO 3 RO 3 AO
Two Units Operating*	NA	1 SS (SRO) 1 SRO 3 RO 3 AO	1SS (SRO) 2 SRO 4 RO 4 AO
All Units Shutdown	1 SS (SRO) 1 RO 1 AO	1 SS (SRO) 2 RO 3 AO	1 SS (SRO) 2 RO 3 AO
SS (SRO)			
2 RO			
3 AO			

SS—Shift Supervisor.
SRO—Licensed Senior Reactor Operator.
RO—Licensed Reactor Operator.
AO—Auxiliary Operator.

Notes:

1. In order to operate or supervise the operation of more than one unit, an operator (SRO or RO) must hold an appropriate, current license for each such unit.

2. In addition to the staffing requirements indicated in the table, a licensed senior operator will be required to directly supervise any core alteration activity.

*Modes 1 through 4 for PWRs. Modes 1 through 3 for BWRs.

** Shift staffing of unlicensed personnel for special cases such as 3 units, operating from 1 or 2 control rooms, etc. will be determined on a case-by-case basis, based on the principles defined in item II.B.3. of this SRP section. Shift staffing of licensed personnel for special cases including temporary deviations and staffing for 3 units must meet the requirements of 10 CFR 50.54(m), however.

C. Technical Rationale

The technical rationale for application of these acceptance criteria to reviewing the operating organization is discussed in the following paragraphs:

1. Compliance with the relevant requirements of 10 CFR 50.40(b) requires that the applicant be technically qualified to engage in the proposed activities in accordance with the regulations in Chapter 50. Similarly, 10 CFR 50.80 requires that an applicant for the transfer of a license be technically qualified to be the holder of a license.

A review of the operating organization established by the applicant to oversee operation of a nuclear power plant provides valuable insight into corporate management's understanding of its safety role in the operation and maintenance of the facility. This information contributes to the determination that an applicant is technically qualified to engage in the proposed nuclear activities by ensuring that appropriate considerations were used in the establishment of general qualification requirements and staffing levels for all key positions on which the safety of the facility will depend.

Meeting the requirements of 10 CFR 50.40(b) and 10 CFR 50.80, as applicable, provides assurance that the applicant is technically qualified to engage in the proposed activities and has established the necessary management and technical support organization to safely operate the proposed facility.

2. Compliance with 10 CFR 50.54(j), (k), (l), and (m) requires the applicant to demonstrate that its operating organization satisfies minimum requirements for operator supervision and the availability of licensed senior operators and licensed operators during reactor operations and other specific reactor conditions or mode of operation.

These are key positions for ensuring the safe operation of the plant. A staffing review of the operating organization provides valuable insight regarding the determination that an applicant is technically qualified to operate the facility.

III. Review Procedures

Preparation for reviewing the SAR or license transfer application should

include familiarization with the documents listed as references to this SRP section.

Each element of the SAR or transfer application information is to be reviewed against this SRP section. The reviewer's judgement during the review is to be based on an inspection of the material presented, whether items of special safety significance are involved, and the uniqueness of the facility. Any exceptions or alternatives are to be carefully reviewed to ensure that they are clearly defined and that adequate basis exists for acceptance.

The applicant should identify the applicable version of references, Regulatory Guides, and Codes and standards used. The reviewer should identify the applicable version of references, regulatory guides, and Codes and standards used in the review.

In the review and evaluation of the information related to the operating organization, the following points should be taken into consideration:

A. During the early stages of construction or plant design, the applicant will generally not have made selections for plant staff positions. The review procedure, therefore, is to examine this section of the SAR for a commitment on the part of the applicant to conform to the stated acceptance criteria.

B. The reviewer must recognize that there are many acceptable ways to define and delegate job responsibilities. Variations in staffing may also be expected between applicants with and without prior experience in nuclear plant operation. It is important that the reviewer verify that applicants lacking in experience do not underestimate the magnitude of the task and that all applicants adequately consider the potential effects of human error. Guidance on human error considerations may be found in NUREG-0711, Chapter 7, "Element 6—Human Reliability Analysis." The reviewer should be alert to the possibility that excessive workloads may be placed upon too small a number of individuals.

The reviewer should also consider that the structure of onsite technical support and maintenance groups may depend somewhat on headquarters staffing and the division of effort between onsite and offsite personnel.

C. During the later stages of construction, plant design, and licensing, the review consists first of the same examination as made for the early stages of construction or plant design, and secondly, of an analysis of each resume. The reviewer should make an explicit comparison of the educational and experience records obtained from each resume with the corresponding endorsed consensus standards requirements and regulatory positions set forth for the applicable position in Regulatory Guide 1.8 or other approved qualifications. "Applicable experience" should be judged in the light of the position responsibility. Credit for experience, which may not be entirely applicable, should be weighed to a degree commensurate with its applicability.

Where a clear comparison cannot be made between the proposed plant staff positions and those defined in the standards endorsed in Regulatory Guide 1.8, the applicant should list each position on its plant staff and designate the corresponding position of these standards, or describe in detail the proposed qualification requirements for each position on its plant staff.

In addition, if the applicant, as of the time the review takes place, has had experience in the operation of previously licensed nuclear power plants, the reviewer may seek independent information relative to plant staffing and qualifications through the appropriate Regional Office, e.g., by discussion with inspection personnel or review of inspection reports.

D. For onshift persons, the total manpower available should be reviewed to ensure that a sufficient number of full operating shift crews are planned so that excessive overtime is not routinely scheduled for these crews. Additional staffing guidance may be found in NUREG-0711, Chapter 6, "Element 5—Staffing." For multi-unit sites, overall site responsibilities should be checked for clarity during those periods of time when senior level supervision is not onsite.

The review procedure for this SRP section consists, therefore, of the following:

1. An examination of the information submitted to determine that all subject

matter identified in subsection I, "Areas of Review," above has been addressed.

2. A comparison of the information with the acceptance criteria of subsection II, "Acceptance Criteria," above.

3. Review of information provided by the NRC Regional Office position statement on the applicant's organizational and administrative commitments made in the SAR, as appropriate.

4. Verification of the implementation of the management structure and technical resources based on visits to corporate headquarters and the site, as appropriate.

The reviewer then determines, based upon the foregoing, the overall acceptability of the applicant's operating organizations and plant staffing plans.

For transfer of an operating license or late stage COL under 10 CFR Part 50.80, the operating organization was found acceptable as part of the initial licensing of the plant. Subsequent changes to the operating organization should have been made in accordance with an appropriate evaluation methodology. Therefore, the existing organization should still be acceptable. The review for license transfer should be focused on the changes that are proposed to the operating organization as a result of the transfer.

For standard design certification reviews under 10 CFR Part 52, the procedures above should be followed, as modified by the procedures in SRP Section 14.3, to verify that the design set forth in the standard safety analysis report, including inspections, tests, analysis, and acceptance criteria (ITAAC), site interface requirements and combined license action items, meet the acceptance criteria given in subsection II, "Acceptance Criteria." SRP Section 14.3 contains procedures for the review of certified design material (CDM) for the standard design, including the site parameters, interface criteria, and ITAAC.

IV. Evaluation Findings

The reviewer verifies that the information presented and its review support conclusions of the following type to be used in the staff's safety evaluation report:

For a Safety Evaluation Report on an Initial CP or early stage COL or for Transfer of a CP or early stage COL

The staff concludes that the applicant's operating organization is acceptable and meets the relevant requirements of 10 CFR 50.40(b), 10 CFR 50.80, as applicable, and 10 CFR

50.54(j) through (m). This conclusion is based on the following:

The applicant has described the assignment of plant operating responsibilities; the reporting chain up through the chief executive office of the applicant; the proposed size of the regular plant staff; the functions and responsibilities of each major plant staff group; and the proposed shift crew complement for single unit or multiple unit operation; the qualification requirements for members of its plant staff; and (personnel resumes for management and principal supervisory and technical positions as submitted during the later stages of construction, plant design, and licensing). This information has been reviewed, and it is the conclusion of the staff that the proposed operating organization is acceptable.

The applicant's operating organization is characterized as follows:

1. The applicant is technically qualified as specified in 10 CFR 50.40(b) and 10 CFR 50.80, as applicable;

2. An adequate number of licensed operators will be available at all required times to satisfy the minimum staffing requirements of 10 CFR 50.54(j) through (m);

3. Onshift personnel are able to provide initial facility response in the event of an emergency;

4. Organizational requirements for the plant manager and radiation protection manager have been satisfied;

5. Qualification requirements and qualifications of plant personnel conform with the guidance of Regulatory Guide 1.8; and

6. Organizational requirements conform with the guidance of Regulatory Guide 1.33.

In addition, the applicant has complied with TMI Action Plan items I.A.1.1 and I.A.1.3.

For a Safety Evaluation Report on a transfer of an OL or Late Stage COL, the findings will summarize the staff's evaluation of the applicant's proposed changes to the operating organization.

For design certification reviews, the findings will also summarize, to the extent that the review is not discussed in other safety evaluation report sections, the staff's evaluation of inspections, tests, analyses, and acceptance criteria (ITAAC), including design acceptance criteria (DAC), site interface requirements, and combined license action items that are relevant to this SRP section.

V. Implementation

The following is intended to provide guidance to applicants and licensees

regarding the NRC staff's plans for using this SRP section.

This SRP section will be used by the staff when performing safety evaluations of license applications or license transfer applications submitted by applicants pursuant to 10 CFR parts 50 or 52. Except in those cases in which the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the method described herein will be used by the staff in its evaluation of conformance with Commission regulations.

The provisions of this SRP section apply to reviews of applications docketed six months or more after the date of issuance of this SRP section.

Implementation schedules for conformance to parts of the method discussed herein are contained in the referenced guides and NUREGs.

VI. References

- 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."
- Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants."
- Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)." (endorses ANSI N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," as supplemented by its regulatory positions)
- Regulatory Guide 1.114, "Guidance to Operators at the Controls and to Senior Operators in the Control Room of a Nuclear Power Unit."
- NUREG-0694, "TMI-Related Requirements for Operating Licenses."
- NUREG-0711, "Human Factors. Engineering Program Review Mode."
- NUREG-0737, "Clarification of TMI Action Plan Requirements."
- The Commission Policy Statement on Engineering Expertise on Shift (50 FR 43621).

Dated Rockville, Maryland, this 27th day of May, 1999.

For the Nuclear Regulatory Commission.

Robert M. Gallo,

Chief, Operator Licensing, Human Performance and Plant Support Branch, Division of Inspection Program Management.
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POSTAL RATE COMMISSION

[Docket No. MC99-1; Order No. 1247]

Mail Classification Case

AGENCY: Postal Rate Commission.

ACTION: Initiation of new mail classification docket.
