

From: Smith, Sean M [sean.m.smith@lmco.com]
Sent: Friday, August 12, 2011 3:09 PM
To: Hon, Andrew
Subject: RE: EXTERNAL: Inputs to the July 28th public meeting on Topical Report review priority and life cycle management

Mr. Hon,

The chance to provide input to the effort to update the NRC's topical report review prioritization and life cycle management processes is appreciated. As requested, here is a set of additional thoughts on the subject that I hope will be beneficial to the update process. Some of these thoughts may have already been expressed during the public meeting.

- It may be that the agency's current budgeting process does not adequately take into account the regulatory efficiency and safety enhancement benefits of the topical report process. Regulatory efficiency improvements increase the rate of accomplishment of regulatory functions, ultimately making the agency's budget go farther. Safety is enhanced when previously-approved and documented designs and methods are available for use by licensees (i.e., standardization). The budget resources allocated to topical report evaluations provide a return on investment that may not be adequately recognized.
- Often, larger improvements in reactor system safety and reliability may be achieved through technology advancement than through incremental updates to existing systems. The topical report process is of great importance to the technology advancement that would bring these improvements. Because of this, it may be that technology advancement should be a factor that drives a topical report to higher priority.
- The topical report prioritization scheme should not favor applicants with previously-approved topical reports, therefore acting as an artificial barrier to the introduction of a new applicant's design or methods.
- Merging topical report reviews with licensing reviews could eliminate the regulatory efficiency benefits of topical reports. This approach could make licensing reviews more technically and administratively complex. It might extend the duration of licensing reviews, especially if staff resources were not added to the review, and staffing has already been identified as an issue with the current topical report process. It would also require great care during a combined review to prevent the safety evaluation from being too specific and making it much more difficult to make use of the topical report in future licensing actions.

Please note that these thoughts are mine alone and they do not necessarily represent the opinions of Lockheed Martin Corporation, its subsidiaries or affiliates

Sincerely,
Sean Smith

From: Hon, Andrew [<mailto:Andrew.Hon@nrc.gov>]

Sent: Thursday, August 04, 2011 9:27 AM

To: Smith, Sean M; Joseph.Murray@missiontechnical.com; james.harrison@ge.com; jyk@nei.org; andracjd@estinghouse.com; lenahanrs@westinghouse.com; brinkmch@westinghouse.com; Alan.Meginnis@areva.com; Pedro.Salas@areva.com; russell_bywater@mnes-us.com; Contractor - Steinert, Larry; Stofko, Mark J

Cc: Jolicoeur, John

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Thank you for your participation in last week's public meeting. We received many valuable insights from the stakeholders at this meeting. We expect some of you may have additional thoughts after you returned your office or discuss with your colleagues. As we mentioned at the closing of the meeting, we'd appreciate if you can send me your inputs by emails or call me after the meeting by August 11th. We'd like to completely and accurately capture all of the comments in our meeting summary and used to improve the topical report process based on stakeholders' inputs.

Thanks again!

Andy Hon, *PE*

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