Nuclear Regulatory Commission
Office of New Reactors
NRO Office Instruction

Office Instruction:	NRO-REG-101
Office Instruction Title:	Processing Requests for Additional Information
Revision Number:	1
Effective Date:	July 10, 2014
Primary Contacts:	Vanice Perin, NRO/DARR
Responsible Organization:	NRO/DARR

Summary of Changes: Updated to remove guidance provided in the eRAI User Manual, provide links to new processes and policy, and update the processes for use with eRAI 2.0.

Training:	Group training on the new version of eRAI software.
ADAMS Accession No.:	ML14091A802

Concurrences			
Primary Office Owner	Planning Optimization Branch		Date
Responsible Manager	David Curtis		04/01/2014
PRMS	Deputy Director	Mark Tonacci	04/15/2014
DARR	Director	Michael Mayfield	02/28/2014
DNRL	Director	Frank Akstulewicz	03/25/2014
DSEA	Director	Scott Flanders	03/24/2014
DCIP	Director	Michael Cheok	03/21/2014
DSRA	Director	Charles Ader	03/24/2014
DE	Director	Stephanie Coffin (A)	03/25/2014
OD/NRO	Deputy Director	Gary Holahan	07/10/2014

OFFICIAL RECORD

NRO Office Instruction
NRO-REG-101

Processing Requests for Additional Information

1. PURPOSE

The purpose of NRO-REG-101, "Processing Requests for Additional Information," is to provide procedural guidance to the Office of New Reactors (NRO) staff and managers regarding development, processing, statusing, and recording requests for additional information (RAIs).

2. GENERAL REQUIREMENTS

RAIs are necessary when agency staff identifies the need for additional information to determine the safety of a design, operation, and siting, as well as environmental issues in accordance with the U.S. Nuclear Regulatory Commission (NRC) rules and regulations. RAIs are needed to verify information not available in the initial submittal, other docketed correspondence, or reasonably inferred from the information available to the staff. RAIs must include concise statements of information needed to complete the technical review and will have a clear and understandable regulatory basis (i.e., consistent with the applicable codes, standards, regulatory guides, and/or the applicable standard review plan (SRP) sections).

RAIs in NRO will be processed and tracked using the electronic RAI (eRAI) computer-based control and workflow component of Enterprise Project Management (EPM). The guidance will be used in conjunction with the "eRAI 2.0 User Manual," located on the eRAI SharePoint page. The User Manual contains a more detailed discussion of the tool's capabilities and their operation. Official records of RAIs will be documented and sent to the applicant in the form of e□mails that are saved in the NRC's official recordkeeping system, Agencywide Documents Access and Management System (ADAMS).

RAIs entered into eRAI system will not include Safeguards Information (SGI), or Sensitive Unclassified Non-Safeguards information (SUNSI). The eRAI system can be used to track the status and workflow of such RAIs. Any RAI entered into eRAI for tracking purposes must be described as non-proprietary and the ADAMS document accession number included in the "RAI Accession No." field should be that for the applicant's redacted document. The ADAMS accession number for the documents containing SGI, or SUNSI are to be listed in the "Notes" field. See Section 3.5, RAIs Containing SGI or SUNSI.

3. SPECIFIC REQUIREMENTS

3.1 Background

Title 10 of the *Code of Federal Regulations* (CFR) 2.102, "Administrative review of application," states that during the review of an application by NRC staff, an applicant may be required to supply additional information. 10 CFR 2.108, "Denial of application for failure to supply

information," states that the NRC may deny an application if the applicant fails to respond to an RAI within 30 days of the date of the request, or within such other time as may be specified by the NRC staff. RAIs enable the staff to obtain all relevant information needed to make a regulatory decision on a license application or amendment request. This process allows for a document that is fully informed, technically correct, and legally defensible. Additional background and guidance is available in the pamphlet titled "Request for Additional Information Best Practices," (ADAMS Accession No. ML12220A577).

The eRAI system models RAIs as a package of required information (in the form of questions) that is to be issued to the applicant. A particular RAI may contain one question or multiple questions. Most often, the RAI is based on staff review of a section of the application against a corresponding section of the SRP or Design Specific Review Standard (DSRS). Questions are bundled into RAIs for the convenience of the reviewer, but may be tracked and closed out on a question-by-question basis. As discussed later, applicants will be encouraged to provide responses to the questions as they are developed rather than wait until the complete RAI (package of multiple questions) response is developed.

While RAI processing has defined participation by distinct individuals (e.g., reviewer, project manager (PM), branch chief, etc.) the process is accessible to all who are interested in monitoring, managing, or viewing the RAI status of a particular application.

3.2 Roles and Responsibilities

Reviewer Branch Chief (BC) is responsible for:

- Reviewing and approving questions entered by their staff or for questions on their project.
- Ensuring that RAI questions contain concise statements of information needed to complete the technical review and have a clear and understandable regulatory basis.
- Ensuring that the status, the assigned reviewer, the "Notes" field, and the branch name of all questions issued by their branch are kept current.
- Negotiating new dates with the PM when either the Planned Response Review Date or the Planned Safety Evaluation (SE) Input Date will not be met.
- Ensuring that their staff meets or manages their assigned eRAI open item due dates.

Licensing BC is responsible for:

- Ensuring that the PMs maintain the data in the eRAI system.
- Keeping up to date on the project status utilizing the eRAI health reports.
- Supporting PMs in communicating expectations to applicants regarding timeliness of RAI and/or open item responses when needed.

Project Manager (Lead or Chapter) is responsible for:

- Ensuring that RAI questions contain concise statements of information needed to complete the technical review and have a clear and understandable regulatory basis.
- Coordinating the eRAI process use for their portion of a project.

- Reviewing and approving questions promptly (as noted below). This review includes verifying that all to be involved in the concurrence are included in the necessary fields in the system.
- Issuing RAIs to the applicant. This includes sending the RAIs to the applicant by e-mail, placing the e-mail and RAIs in ADAMS, and entering the ADAMS accession number for the RAI into the "RAI Accession No." field in eRAI.
- Ensuring that the question status in eRAI is consistent with the applicant's understanding. This includes reviewing e-mail notifications of question status changes in eRAI.
- Ensuring that the status in eRAI is current at the close of Phase 2 (Safety Evaluation Report (SER) with Open Items issued) per section "Question Workflow: Review of Response" and "Appendix B: Question Information" of the "eRAI 2.0 User Manual":

    - all questions have a status of "Resolved - Closed," "Confirmatory Action," or "Unresolved - Closed,"
    - a follow-up RAI is issued for all questions with a status of "Unresolved - Closed" and the follow-up RAI is added to the "Related Question" field,
    - all Open Items have an associated question (or follow-up question), and
    - the "Notes" field is up to date for all Open Items and questions with a status of "Confirmatory Action," or "Unresolved - Closed."

- Ensuring that the status in eRAI is current at the close of Phase 4 (Advanced SER with no Open Items), Phase 6 (Final SER), or Phase B (Advanced SER with no Open Items), in that:

    - all Open Items, Open Item follow-up questions, and new Phase 4 questions have a status of "Resolved - Closed" or "Unresolved - Closed," and the "Notes" field is up to date,
    - a follow-up RAI is issued for all questions with a status of "Unresolved - Closed," and
    - the follow-up RAI is added to the "Related Question" field.

- Entering the RAI date, the response date, and Response Accession No. in the system.
- Forwarding responses as they come in to the technical reviewer through the eRAI workflow.
- Entering the Response Review and Actual SE Input Dates for Open Items.
- Implementing External Communications by:

    - periodically running the "0100 eRAI Public Report for Website,"
    - checking the report for accuracy and making changes or updates to the eRAI data when needed,
    - downloading the report to a PDF and sending to NROWebServices.Resource@NRC.gov for uploading on the NRC public Web site.

Reviewer is responsible for:

- Creating and entering RAI questions into eRAI promptly and in accordance with the review schedule. These questions should request information needed to complete the technical review, and should have a clear and understandable regulatory basis.

Examples can be found in the "Request for Additional Information Best Practices," (ADAMS Accession No. ML12220A577).

- Forwarding RAI questions to the reviewer's BC using the eRAI workflow.
- Ensuring that the status, the "Notes" and the "Related Question" fields of all their questions are kept current in eRAI.
- Prior to providing the PM an input to an SER, verify that:
  - all questions have a status of "Resolved - Closed," "Confirmatory Action," or "Unresolved - Closed,"
  - a follow-up RAI is issued for all questions with a status of "Unresolved - Closed" and the follow-up RAI is added to the "Related Question" field.
  - all Open Items have an associated question (or follow-up question), and
  - the "Notes" field is up to date for all Open Items and questions with a status of "Confirmatory Action," or "Unresolved - Closed."
- Meeting or managing open item due dates in eRAI.

<u>Office of the General Counsel (OGC) is responsible for</u>:

- Reviewing and approving questions promptly as noted below.

3.3 Documentation and Distribution of RAIs

To maximize the benefits of the RAI workflow, e-mail is used as the vehicle to transmit the RAI to the applicant, and it is the official agency record (OAR). In the case of Combined License (COL) applications, posting the RAI and responses to the external Web replaces distribution to persons on the service/mailing list. To achieve these efficiencies, the licensing BC or Lead PM should:

- Reach agreement with the applicant on points-of-contact, e-mail addresses, and other protocols related to RAIs.
- Document the process in a letter, with copies to the complete service/mailing list. The letter should include information on the availability of RAIs via the NRC Web site and ADAMS. The letter should also clearly state that it is the intention of the NRC not to send paper copies of RAIs.

3.4 eRAI Workflow Process

The eRAI Workflow Process is set up to support a standard set of roles (e.g., Technical Branch Chief, Chapter PM, Lead PM, etc.). The roles and an overview of their responsibilities and options include:

<u>Reviewer Generates an RAI</u>

The reviewers should conduct a detailed review of the application against the acceptance criteria in the SRP or DSRS to prepare their portion of the safety evaluation report or the Environmental Impact Statement (EIS). No RAI is needed if the staff is able to complete the

SER or EIS, including making its reasonable assurance finding, using the information included in the application, other docketed correspondence, or information that can be reasonably inferred. If there is missing information that prevents the reviewer from reaching a conclusion about the design adequacy of the application, the reviewer generates questions necessary to obtain the needed information. Often, an initial telephone call with the applicant to discuss the concerns is beneficial as it can provide the applicant with a general idea of what informational areas the staff considers deficient as well as an opportunity for the applicant to inform the staff where the information is located if it is already included in the application.

When generating an eRAI, the reviewer fills out all asterisked fields in the input form to enter an RAI in the system. If the reviewer does not know the names of all of participants, the Chapter PM's name should be provided in those fields. Next, the reviewer enters questions into the eRAI using the question input form. If this is a follow up RAI, the reviewer would enter all related questions into the "Related Questions" field in eRAI and use the eRAI workflow to forward the RAI to the reviewer's branch chief for review and approval.

<u>Reviewer's Branch Chief (BC) Reviews the RAI</u>

When the reviewer forwards the RAI to the reviewer's BC through the eRAI workflow, the system automatically sends the reviewer's BC an e-mail notification informing that the RAI is ready for review. The reviewer's BC can then click the RAI link and go directly to it. Each question listed at the bottom of the RAI must be opened and reviewed. Changes to the questions are discussed between the reviewer's BC and reviewer. The reviewer's BC may send the RAI back to the reviewer to make major changes, or make the changes for the reviewer if they are minor. If the reviewer's BC has already discussed the questions with the reviewer, eRAI has an "approval all questions" button that bypasses the need to open each question. In approving the RAI, the reviewer's BC agrees that the request is reasonable and agrees with its regulatory and technical basis. After approving all questions, the reviewer's BC forwards the RAI to the Chapter PM through the eRAI workflow.

<u>Chapter PM Reviews the RAI</u>

When notified via e-mail that an RAI has been sent for review, the Chapter PM performs a review using the same process described for the reviewer's BC review. The Chapter PM's review focuses on the clarity of the questions, the regulatory basis, and the need for the information. Although the Chapter PM can modify the RAI, changes that affect content or intent of a question <u>must</u> be discussed with the reviewer or the reviewer's BC first. Editorial or minor changes may be made by the PM without technical consultation. The Chapter PM also verifies the asterisk marked fields to ensure the correct contacts are included and enters the remainder of applicant information in the "non-asterisk" fields. Different design centers have the option of having the Lead PM or the Chapter PM process RAIs. Assigning the Chapter PM's name as the Lead PM for the particular RAI allows for the second option. Once the Chapter PM reviews the RAI and approves all questions, the eRAI workflow gives the Chapter PM the option to send the RAI to OGC or to the licensing BC (see the optional licensing BC Section below). OGC attorney concurrence is necessary for all RAIs when a hearing is required, such as in the case of COLs or Early Site Permits (ESPs). When no hearing is required, the PM forwards the question on to the Lead PM.

OGC Reviews the RAIs for COLs and ESPs

A hearing is required for COL and ESP applications. OGC reviews RAIs to confirm that there is a regulatory basis for issuing the RAIs. Moreover, the development of a hearing file is necessary so that the Agency may disclose all relevant documents supporting the staff's review of the application. Therefore, OGC must concur on all RAIs related to COL and ESP applications.

OGC review will be similar to that of the PM with the primary focus on the regulatory basis for the questions. The step-by-step procedure used by the OGC attorney is the same as that described in the reviewer's BC Section. Although the level of effort of each OGC review varies depending on such factors as length and complexity of the RAI, competing priorities, etc., initial OGC review may take up to 4 business days. Re-reviews or review of simple RAI questions are expected to be conducted in a shorter time frame. As with the PM review, minor changes that do not affect technical content of the question can be made by the attorney. Significant changes are brought to the attention of the Chapter PM, who is expected to discuss them with the reviewer and/or the reviewer's BC. Sometimes a discussion between OGC and the staff is needed in order to determine the disposition (e.g., remove from RAI, reword, etc.) of a particular question. Upon completion, the eRAI workflow is used to inform the Lead PM that the OGC review is complete.

Licensing BC Reviews the RAI (optional)

The licensing BC may review and concur on an RAI. This is an optional step. Once the Chapter PM reviews the RAI and approves all questions, the eRAI workflow gives the Chapter PM the option to either send the RAI directly to OGC or to the licensing BC prior to OGC. When notified via e-mail that an RAI has been sent for review, the licensing BC performs a review using the same process described for the reviewer's BC review, where the licensing BC either uses the eRAI workflow "Send back to Chapter PM Review" when further action by the Chapter PM is needed, or uses the eRAI workflow to "Send to Final Review" when concurring.

Lead PM Reviews the RAI

As discussed above, the Lead PM name is assigned as determined by the Design Center – it can be the actual Lead PM for the project or the Chapter PM. Whichever is chosen, the Lead PM for the project still has the option of monitoring the progress of an RAI at any stage. After OGC has completed its review (where required), the RAI is sent to the Lead PM. The step-by-step review procedure conducted by the Lead PM is the same as that described previously. The Lead PM may access the RAI at any time in the process. Including the Lead PM in the workflow provides continuity and oversight of the status of that portion of the application review. Once the Lead PM completes the review of the RAI and all questions, the RAI is ready to be issued.

3.5 RAIs Containing SGI or SUNSI

The eRAI is an internal system to NRC. However, reports generated from the data by eRAI are made publicly available through the NRC Web page or in an appendix included in the license at the conclusion of the review. Therefore, no SGI, or SUNSI can be included in the system. The "Sensitivity" field is used to flag the RAI questions that are SUNSI or SGI. For SGI RAIs, the

eRAI system is used for workflow purposes only. These RAIs are prepared and processed in a completely separate system. Most SUNSI RAIs have non-SUNSI questions with SUNSI responses. The “RAI Accession No.” and “Response Accession No.” fields should point to redacted versions of SUNSI documents. Questions containing SUNSI must be prepared outside the eRAI system. The “Notes” field should be used to point to the nonpublic versions of the RAI documents.

3.6 Conference Calls with the Applicant

There is some latitude with regard to the points within the NRO licensing and design review processes at which conference calls can be held with the applicants. PMs and technical staff should use this flexibility to ensure the most timely and efficient interactions with applicants to support the NRC review process. eRAI discussions should comply with guidance provided in Management Directive 3.5, “Attendance at NRC Staff-Sponsored Meetings,” to avoid inadvertent issues that should be discussed in a public forum.

COL and ESP Applications (Processes with Hearings)

For COL and ESP applications, conference calls can be held at various points in the process. It could be at an early stage where there is a general discussion with the applicant of areas where additional information may be needed or at a later stage after the RAI is issued. Conference calls during the review, including during development of an RAI, should be documented in accordance with guidance related to the generation of records to support hearing and mandatory disclosure files.

Regardless of where in the process the conference call is conducted, several topics should be addressed: (1) whether the formal RAI involves the transmittal of proprietary information (presently the eRAI process does not accommodate the transmittal of proprietary information); and (2) whether the applicant understands the questions. If the phone call is held later in the process (i.e., the RAI has been issued to the applicant as a preliminary document), there may be a discussion of the amount of time to be allowed for the applicant’s response. Thirty days is the default response time. Applicants frequently request to have the conference call earlier in the process because they have an opportunity to develop an understanding of the questions and are able to begin work on the responses before the official RAI is issued. During the call, the Chapter PM should encourage the applicant to respond to individual questions as soon as the answers are developed and approved by appropriate management.

Design Certifications (DCs) and Topical Report Reviews (Non-hearing Processes)

For DCs, the conference calls are held at any time after the technical and licensing staffs have developed the questions and at any point where they believe interaction with the applicant is needed to answer questions.

3.7 RAI Document Generated and Issued as an OAR

After all internal reviews are completed and all questions are approved, the Chapter PM follows the “Process for Issuing RAIs” (ML13346A965), available on the eRAI SharePoint page. In this process, the Chapter PM adds the NRC RAI letter number to the eRAI system. Once this information is added, the PM generates the RAI document by clicking on the “Issue RAI.” An

e-mail is generated by the system and sent to the Chapter PM with the RAI attached as a Microsoft Word document. The Chapter PM will then follow the “Process for Issuing RAIs” and create a package that is entered into ADAMS as an OAR.

After the RAI is generated, it is converted to a PDF file and sent to the applicant as an attachment to an e-mail. In using the current process for creating OARs from e-mails, the e-mail and attachment are entered into ADAMS to become an OAR. Both the draft and official RAIs must be entered into the hearing file. It is expected that each project will have an electronic e-mail capture system. When the PM sends the RAIs to the applicants, the e-mail capture address can be included as a “cc.” After the RAI is issued, the Chapter PM should confirm that there are no ongoing activities that would preclude deletion of the “Version History,” for each RAI and RAI question.

3.8 Receipt of RAI Responses

The applicants should be encouraged by the PMs to provide answers to individual RAI questions as soon as the answers are prepared and the applicant is reasonably confident of the accuracy of the answers. However, the official response must be sent to Document Control to be placed in ADAMS (through the mail or electronically through eRIDS distribution). The Lead PM should work with the applicant to establish how RAI responses are to be submitted. Chapter PM should inform applicants that e-mail can be used to initially transmit the answers. The Chapter PM is to follow the eRAI User Manual 2.0 available on the eRAI SharePoint page. Another useful and quick reference document for the PM also located at the SharePoint page is the pamphlet eRAI Quick Start Card.

Once all answers in an RAI response have been entered, the Chapter PM uses the eRAI workflow to place the response “In Evaluation.” This will generate an e-mail to be forwarded to the reviewer, providing a link and informing the reviewer that a response has been assigned to them. The reviewer reviews the response and determines whether it is acceptable. If it is acceptable, the reviewer uses the eRAI workflow to status the response. If it is determined that the response is not adequate or clarification is needed, the reviewer should work with the Chapter PM to arrange for a conference call to discuss the question, and, if necessary, enter a supplemental RAI into the eRAI system.

3.9 RAI Status Tracking

The status of RAIs will be maintained in the eRAI system by the licensing branch and cognizant reviewers using the eRAI workflow and fields set up to track notes and related questions. The Chapter PM receives the response and uses the eRAI workflow to change the status to “In Evaluation” or if the response is later revised, is responsible for reopening the question or RAI and setting the appropriate status. The reviewer is responsible for using the eRAI workflow to change the status from “In Evaluation” to “Confirmatory Action,” “Unresolved - Closed,” or “Resolved - Closed.” The reviewer is also responsible for documenting the current status in the “Notes” field when the question is statused as other than “Resolved - Closed” so that in the future the path to closure for the question can be understood. In addition, the reviewer is responsible for noting any related questions in the “Related Question” field for that question.

The question statuses and definitions that are to be used include:

- **Issued/Waiting for Response**: The question has been issued to the applicant and the NRC is waiting for a response from the applicant. [Note: This can be for a new RAI question, for a follow-up question, or for the special cases noted in the examples below].
- **In Evaluation**: The applicant has provided a response to the question and it is being evaluated by the NRC.
- **Confirmatory Action**: The applicant has responded to the question. The NRC has reviewed and agrees with the response and the proposed markups, but some action is still needed as part of the response is not complete (e.g., Final Safety Analysis Report (FSAR) change has not been formally submitted).
- **Resolved - Closed**: The NRC has accepted the response and no additional issues or concerns are remaining for that question.
- **Unresolved - Closed**: The applicant has provided a response that did not adequately resolve the issue and the staff has issued a follow-up question.

Some examples of how to address questions where the status changes or the response does not adequately address the question include:

- For a question where the applicant responded with a stated need to change the design/methodology or to provide additional information in a revised FSAR section at some later date, either:

    - Change the Question status back to “Issued/Waiting for Response” and add an explanation in the “Notes” field stating that the applicant determined redesign was necessary and would be sending in a revised FSAR section by [date], or
    - Change the question status to “Unresolved - Closed,” add an explanation in the “Notes” field, issue a follow-up RAI to indicate the question still needs to be addressed, and add the follow-up RAI to the “Related Question” field.

- For a question where the applicant provided a response without specifically addressing the raised issues, only agreeing to address the questions by some future action change the question status to Unresolved - Closed, add the explanation in the question “Notes” field, issue a follow-up RAI to indicate the question still needs to be addressed, and add the follow-up RAI to the “Related Question” field.

- For a COL question where the COL applicant provided a response, but the staff is aware of changes coming in the DC application review that will impact this COL question - change the Question status back to “Issued/Waiting for Response” and add the explanation in the “Notes” field stating that the COL applicant will revise this response as a result of changes to the DC application.

- For a question where the applicant has responded but either the applicant or NRC management has chosen not to proceed until further notification and the review should be placed on hold at this time - change the Question status back to “Issued/Waiting for Response” and add the explanation in the “Notes” field stating that the review will begin when the circumstance is no longer applicable.

3.10 Internal Communications

The eRAI process is intended to improve the efficiency of processing RAIs for the office and reduce the processing time through electronic transmission, work flow, and providing up to date status. This process is not intended to replace the normal communication channels that exist between the licensing staff, technical staff, and applicants. Maximum work flow efficiencies can be realized through maintaining effective communications between all those involved in using the eRAI workflow tool. While internal staff discussions are not necessarily expected at each step, it is important for each individual in the process to recognize and initiate communication outside of the process when needed. Several aspects in the management of RAIs should be worked out within the licensing branch ahead of time.

For timing, after the reviewer is satisfied with the initial formulation of the RAI questions, each subsequent step in the review and concurrence process is expected to take one to two days. The PM should endeavor to understand when process time exceeds the estimate and either accept the additional time or take actions to bring it back in line with expectations. There should be an understood arrangement between the Lead PM and Chapter PMs regarding the PM responsibility for oversight and management of RAIs (will the "PM" role be filled by the Lead PM or the Chapter PM for all RAIs – if not, for which RAIs). Each licensing branch will need to maintain an understanding as to when licensing Branch Chief review and concurrence on RAIs is needed.

3.11 External Communications

"0100 eRAI Public Report for Website" is intended to be posted on the agency public Web page to allow the public to maintain an understanding of the RAI status. The report can be accessed on the eRAI SharePoint page. The Lead PM is responsible for running the report, checking the report for accuracy, making changes and updates to the eRAI data when needed, downloading the report to a PDF, and sending it to NROWebServices.Resource@NRC.Gov for uploading onto the public Web site.

3.12 eRAI Reports

Several reports are available on the eRAI SharePoint page allowing staff and management to track the progress of RAIs. Current information related to these reports can be found at the eRAI Reports Library, which provides a listing of the available reports in categories such as statusing, distribution, and history. These reports can be used by staff to track status and maintain an understanding of the RAIs and questions in the eRAI system.

3.13 Open Item Timeliness

NRO has implemented a process for resolution of open and confirmatory items that provides timeliness expectations as described in memorandum "Process and Timeline for Closure of Open Items and Confirmatory Items in Safety Evaluation Reports," (ADAMS Accession No. ML100060495), dated January 8, 2010. eRAI contains fields to track the planned and actual response review and SER completion dates for open items. The Chapter PM is expected to ensure that accurate dates are entered in these fields in accordance with the expectations and the dates negotiated with the BC responsible for the review area. The PM should track these dates and contact the reviewer or their BC if the dates are not met. The memorandum allows

for negotiation between the PM and the reviewer's BC for difficult review areas or where the system assigned date 30 days after the response is received and it cannot be supported. eRAI Report No. 108 can be used by the PM to check on the status of open items for their review area.

3.14 Project Performance Tracking

The licensing branch will have the ability to report on the status of RAIs closure at the Project Performance Meetings. This could include discussing the total number of RAIs, how many have been resolved, how many RAIs are opened in later phases (after Phase 3), and how many RAIs are being tracked as Open Items. Project health reports are available that provide charts showing the number of late RAI responses for both staff and the applicant/licensee. NRO wrote a phase discipline policy for Phase 2 which calls for all RAIs to be categorized as closed or as open items in Memorandum "Clarification of Phase Discipline Policy," (ADAMS Accession No. ML100950260), dated April 7, 2010. The policy limits open items to those issues that have a well-defined scope and clear resolution path likely to be resolved with one response. In discussing project performance, the PMs have the option to report on phase discipline implementation and the timeliness of addressing open and confirmatory items.

3.15 License Appendix of RAIs

Once the licensing work is complete, eRAI will be used to print out a license appendix listing all the RAIs and their status. This is a corrective action put in place to address issues identified with previous licensing reviews and the staff's ability to show how the RAI questions for the review were dispositioned. eRAI Report No. 102 currently fills this function. It can be accessed from the eRAI SharePoint page.

4. REFERENCES

1. "Request for Additional Information Best Practices" (ML12220A577).
2. NRO, "eRAI User Manual - Electronic Request for Additional Information 2.0," Version 2.0, June 2013.
3. NRO Memo, "Clarification of the Phase Discipline Policy," dated April 7, 2010 (ML100950260).
4. NRO Memo, "Process and Timeline for Closure of Open Items and Confirmatory Items in Safety Evaluation Reports," dated January 8, 2010 (ML100060495).

NRO-REG-101, Rev. 1 - Change History			
Date	**Description of Changes**	**Method Used to Announce & Distribute**	**Training**
05/14/2008	Initial Issuance	NRO Internal Web page	None
07/10/2014	Updated to remove guidance provided in the eRAI User Manual, provide links to new processes and policy, and to update the processes for use with eRAI 2.0.	NRO Internal Web page	Group training on the new version of eRAI software.