

May 9, 2018

MEMORANDUM TO: To Those on the Attached List

FROM: Frederick D. Brown, Director **/RAI/**
Office of New Reactors

SUBJECT: EFFECTIVE USE OF REQUESTS FOR ADDITIONAL INFORMATION
IN NEW REACTOR LICENSING REVIEWS

Since the beginning of fiscal year 2016, we have undertaken several initiatives to examine certain aspects of licensing activities with the goal of promoting a safety focus, improved efficiency, and greater consistency and clarity in our ongoing and future reviews of new reactor licensing applications. These initiatives include revising the Request for Additional Information (RAI) process to promote consistent generation of high-quality RAIs, emphasizing best practices for audits and independent calculations, and developing the NuScale enhanced safety focused review process. I appreciate the innovative thought and hard work that was dedicated to these efforts and thank the staff and management involved in these endeavors. These initiatives will continue to reap benefits as we strive toward excellence in carrying out our mission. This memorandum documents the latest evolution of the RAI process, and updates the RAI expectations in a memorandum issued by Jennifer Uhle on October 7, 2016.

As many of you know, we have had a diverse team of folks from across the Office performing an audit of our recent RAIs. The audit report is now available at Agencywide Document Access and Management System Accession No. ML18096B419. I thank the team for their review and recommendations. The RAI audit team found the quality of the RAIs that have gone through the current review process was generally excellent. There were some examples of individual RAIs that didn't fully meet our expectations, and the team will provide feedback to the staff and management team to help ensure that we learn how to avoid these issues in the future.

Given the improvement that has already occurred in the development and review of RAIs, and issuance of the RAI audit report, Vonna and I concluded that it is now appropriate to focus more on improving the efficiency of our current RAI approval process.

Starting today, we are modifying the RAI process such that division leadership for the division from which the RAI originates will perform the final technical review and approval of all RAIs. In other words, we are removing the requirement for the Director of the Division of New Reactor Licensing's (DNRL) to review all RAIs before issuance. After approval by the technical division leadership, the DNRL project managers and branch chiefs will continue to perform their important role of reviewing RAIs, providing appropriate feedback and identifying any

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crosscutting issues. I will only review RAIs on a sampling basis to keep abreast of high-priority issues identified in reviews, and to support our emphasis on improved efficiency as we focus on safety, security, and environmentally significant matters. The Office of New Reactors (NRO) Office Instruction on RAIs and the RAI job aid will be updated in the near future to reflect these expectations. Please also refer to the enclosed flowchart intended to facilitate a common understanding of the modified RAI review and approval process.

We want to be clear that this change continues our high expectations for the quality of RAIs. At the end of the year, all of the executives in NRO will be accountable for demonstrating “results achieved” in addressing the lessons-learned in RAI development and issuance.

In evaluating whether results are achieved in this respect, we will be paying particular attention to the following aspects of staff generated, and branch chief and SES approved RAIs including:

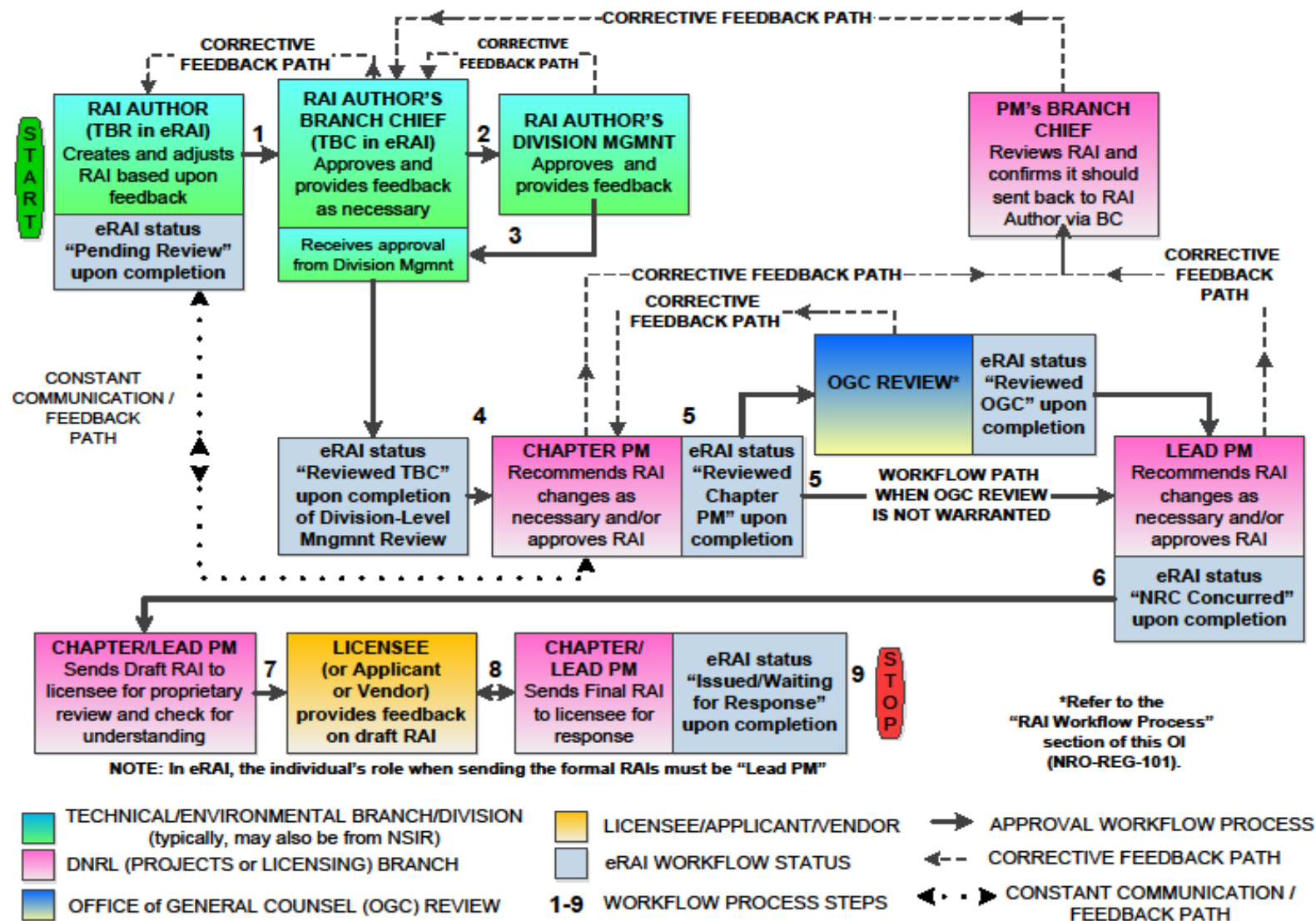
- Is the regulatory basis of the RAI clear, including the specific safety or security finding that the staff must make and why the information requested by the RAI is necessary in order for the staff to reach its finding?
- Does the RAI provide sufficient context to understand the safety, risk, or environmental significance of the information with respect to whether the licensing acceptance criteria is met (using a quantitative example, “The application states that there is 5% margin to the applicable regulatory limit, and staff’s assessment is that the issue addressed by this RAI could eliminate a substantial amount of that margin”)?
- Is the RAI clear regarding what the staff is seeking in response, such that the applicant’s response can fully resolve the issue, without being prescriptive in a manner that is inconsistent with the applicable regulatory requirement?

As we continue to gain experience using the modified NRO processes and job aids, we welcome your input on new ideas to further improve them. They are living documents and we will all benefit if we continue to share suggestions on how best to conduct our important business. If you have any comments or questions related to the RAI process and its job aid, please contact Anna Bradford at 301-415-1560.

I look forward to our continued success in conducting effective and efficient reviews with a greater safety focus, as we apply the RAI process and the job aid. I appreciate your commitment and dedication to our shared mission.

Enclosure:
As stated

NRO RAI REVIEW and APPROVAL PROCESS UP TO INITIAL RAI ISSUANCE – SPRING 2018



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REACTOR LICENSING REVIEWS DATED: May 9, 2018

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NRO-002

OFFICE	NRO	NRO/DCIP	OGC*	NRO:D
NAME	DRoyer	TMcGinty	SVrahoretis	FBrown
DATE	4/20/18	4/25/18	5/3/18	5/9/18

MEMORANDUM TO THOSE ON THE ATTACHED LIST DATED

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Division of New Reactor Licensing, Office of New Reactors
Division of Engineering and Infrastructure, Office of New Reactors
Division of Safety Systems, Risk Assessment & Advanced Reactors
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