

ENCLOSURE 4

**Recommendations for Process Improvements
and Other Actions Outside the Scope of
Risk-Informed Decision-Making Project Phase 2**

Recommendations for Process Improvements and Other Actions Outside the Scope of Risk-Informed Decision-Making Project Phase 2

The following recommendations include process improvements and other actions that are outside the scope of Risk-Informed Decision-Making (RIDM) Phase 2, but could nonetheless enhance the efficiency of the Office of Nuclear Reactor Regulation (NRR) and U.S. Nuclear Regulatory Commission (NRC) processes. They were developed from the preliminary recommendations in Enclosure 5 to the cover memorandum for this document and modified based on feedback from process stakeholders. These recommendations could be addressed as part of the agency's efforts to further expand RIDM beyond NRR processes, NRR's regular reviews and updates of its processes, or the activities of the Transformation Team.

General

1. Create a vacant branch with on-the-shelf infrastructure that can be immediately staffed as a specialized integrated review team (IRT) for emergent issues that have sufficient risk-significance or public interest. Staffing this branch could be done at the recommendation of the expert panel recommended by Recommendation 2 under "Backfits," below, or as a result of following the NRR Office Instruction (OI) LIC-504, "Integrated Risk-Informed Decision-Making Process for Emergent Issues," process, and could facilitate immediate implementation of an action plan developed under NRR OI LIC-502, "Procedure for Development, Implementation, and Management of Action Plans."
2. Support and increase the use of collaborative tools such as OneDrive and OneNote to accelerate the pace of product development. The current Agencywide Documents Access and Management System (ADAMS) interface adds unnecessary burden to the collaborative process. The staff notes that these tools have been used effectively to increase the efficiency of regulatory audits, although this is not formalized in the related guidance. Consider updating NRR OI LIC-111, "Regulatory Audits," to encourage the use of collaborative tools to enhance the efficiency of regulatory audits.
3. Ensure that all NRR staff impacted by the new NRR RIDM office instruction and any other process changes resulting from the RIDM project receive adequate training on RIDM and the IRT process. As far as practicable, the training should be included in a revision to the general study activities of NRR OI ADM-504, "Qualification Program," and the applicable position-specific qualification requirements.

Power Upgrades

1. Team E considered recommending a ticket to explore allowing licensees to use a risk-informed approach to justify, and the staff to approve, applications of power upgrades resulting in more than 20 percent above the original licensed thermal power limit. However, because there are no near-term plans for extended power upgrades within the next 5 years, and because of challenges with the availability of staff resources, Team E determined that this recommendation can be revisited if the need arises (i.e., if industry expresses an interest in this approach and plans to submit such applications).

Environmental Reviews

1. Consider issuance of the draft Environmental Impact Statement as a normal document for public comment, instead of producing a NUREG series publication. This could reduce the overall schedule and burden on the NRC for license renewals and other NRR or agency reviews requiring an Environmental Impact Statement.

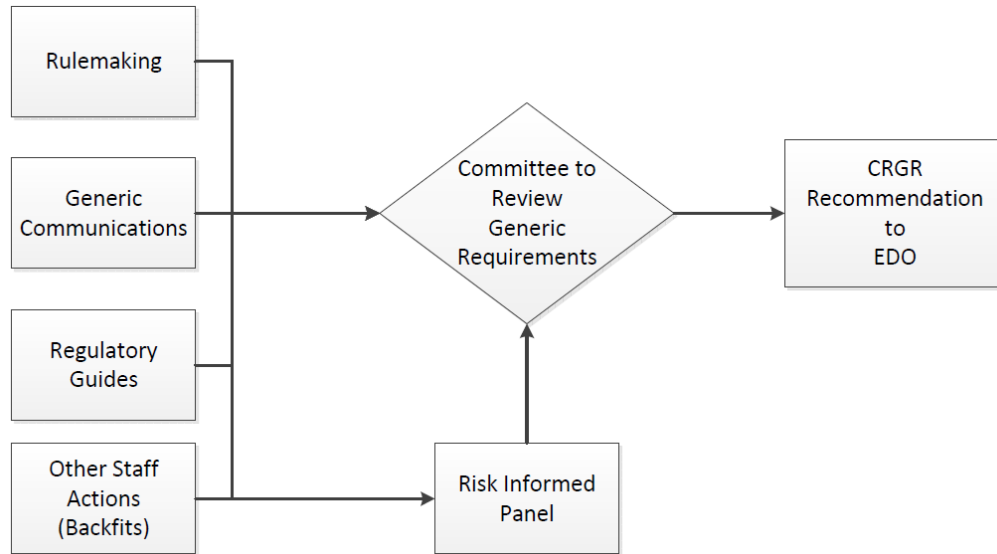
Backfits

1. Continue to follow Commission input on the updates to NUREG/BR-0058, "Regulatory Analysis Guidelines of the U.S. Nuclear Regulatory Commission," and Management Directive (MD) 8.4, "Management of Facility-Specific Backfitting and Information Collection," and make additional recommendations as appropriate.
2. Recommend that management consider the formation of a risk-informed review panel that would provide an independent evaluation to management regarding the necessity of agency actions. One concept for implementation is provided below, where such a panel would provide independent input to the Committee to Review Generic Requirements in relation to proposed agency actions.

The panel would be like that proposed in the October 13, 1998, memorandum, "Steering Committee for Risk Informed Activities" (ADAMS Accession No. ML082740310). The panel would be composed of division directors from within NRR which participate in licensing reviews. A representative from the Office of Research as well as a representative from the Office of the General Counsel would be included as well. The purpose of the panel would also mirror that of the 1998 memorandum, which stated, in part, that:

The purpose of this panel is to streamline the review of risk informed licensing actions by serving as a focal point for resolution of technical issues and for guidance on policy implementation to NRR staff. This panel will provide a forum for the staff, licensees, owners groups, or the public to receive management attention on issues. The panel will also monitor the overall implementation of risk informed licensing actions. To be able to operate effectively as a decision making body, this panel has been empowered to resolve technical differences as well as issues associated with implementing risk-informed policy, and to provide direction in those areas that cross branch and division boundaries. The panel will attempt to resolve issues through a consensus process and in other cases will provide a discussion and characterization of alternatives to the NRR Executive Team for final decisions.

This panel could streamline risk-informed reviews, similar to what was done in the past (e.g., see ADAMS Accession Nos. ML050180253 and ML050340394 related to risk issues concerning electrical grid reliability and ADAMS Accession No. ML011770491 related to risk-informed changes to Section 50.46 of Title 10 of the *Code of Federal Regulations*).



3. The backfit process affects multiple agency processes, including rulemaking, generic communications, orders, inspections that go beyond licensing basis information, and changes to technical specifications. While the current RIDM project focuses on NRR, future efforts to expand RIDM beyond NRR should recognize the holistic nature of agency processes and engage all stakeholders accordingly.

Topical Reports

1. As part of a future engagement with the industry (e.g., public meeting) to discuss NRR OI LIC-500, "Topical Report Process," and potential topical report review process improvements, include risk insights as one of the discussion areas to provide an opportunity for industry to discuss any potential benefits or interest in use of risk insights for topical report reviews.
2. Consider small updates to LIC-500 to encourage greater ongoing engagement between all reviewers working on a project, including contractors.

Generic Communications (Generic Letter, Bulletin, Regulatory Issue Summary)

1. Consider a future update to MD 8.18, "NRC Generic Communications Program," to include high level guidance to the staff for implementing IRT concepts early in the issue development phase, when appropriate.