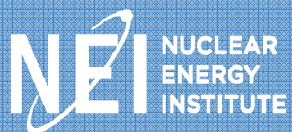


Enhancements to the Task Interface Agreement Process

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TIA Process Enhancements

- Increase Process Rigidity
- Greater Emphasis on Backfit
- Include an Appeal Process
- Eliminate Pre-decisional Consideration
- Establish Exit Criteria for Low Safety Significance Issues



Increase Process Rigidity

- “Screening Criteria” for entry developed
- Licensee access to questions during initial development
- Defined communication requirements with the Licensee
- Licensee position captured during development of draft TIA
- Ensure engagement with DORL and OGC throughout, if licensing basis impacted
- Documentation and durability of decisions
- Specific criteria for engaging other offices



Adherence to Backfit

- Use of staff positions and applicability to licensee must be clear
- Procedure requirements/details on when to conduct a backfit review throughout the process including the final outcome
- Ensure interpretations of licensing basis are considered for backfit
- Provision for CRGR review/engagement if requested by the Staff or Licensee



Include an Appeal Process

- Licensee should be afforded the right to appeal
- Opportunity for the Licensee to engage beyond “fact check” at the end of the process



Eliminate Pre-decisional Consideration

- Process transparency and openness
- Should be considered an extension of inspection and/or review activity
- Ensure finalized TIA questions are provided to the Licensee to support increased engagement



Establish Exit Criteria for Low Safety Significance Issues

- An assessment of safety significance needs to occur prior to, and continuing throughout the TIA process
 - Issues of sufficiently low safety significance should be dispositioned as requiring “no further action” on the part of the licensee or NRC
 - The basis for decisions should be well-documented to ensure durable issue closure, as well as providing a basis to reexamine the issue if new or different information becomes available in the future
 - Consistent with the Principles of Good Regulation



Establish Exit Criteria for Low Safety Significance Issues

- Initial focus of the low safety significance issue resolution (LSSIR) effort should be on the resolution of licensing basis questions that do not involve clear non-compliance with legally binding requirements (such questions may arise in various contexts)
 - Insights may yield efficiencies that also improves resolution of compliance issues
- TIAs often involve resolution of questions regarding the interpretation of the approved licensing basis stemming from lack of clarity, or other ambiguities
 - As opposed to situations that involve clear non-compliance with legally binding requirements
- Establish criteria for assessing the safety-significance

Summary



- We see a great opportunity to enhance the TIA process to make it more effective and efficient for both Staff and Licensees, ensuring the appropriate focus on safety.
- Thank you for your consideration!