Industry SLR Lessons Learned

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AGENDA

- ➤ PRE-SUBMITTAL ACTIVITIES
- ➤ SUFFICIENCY REVIEW
- ➤ OPEX AUDIT
- ➤ IN-OFFICE AUDIT
- ➤ REQUEST FOR ADDITIONAL INFORMATION
- ➤ PART 51 ENVIRONMENTAL
- ➤ TECHNICAL ISSUES

Pre-Submittal Activities
(Safety & Environmental)

- NRC-Industry SLR phone calls have been effective to increase applicant understanding SLR related issues

- NRC Lessons Learned Memos dated 12/13/2017 was important for understanding NRC expectations

- Pre- application meetings 6-12 months prior to submittal were a useful forum for common understanding of important issues to be addressed in the SLRA

- Assignment of the NRC PMs well before the LRA submittal date

Sufficiency Review
(Safety & Environmental)

- Some sufficiency review issues were unexpected. New technical & environmental content requirements should be communicated during the pre-submittal activities

OPEX Audit
(Safety)

- The OE audit setup is extensive and expensive for the applicant. It is not clear if a desired benefit for this effort is achieved.

- Standardized key word list should be developed and made available prior to the audit (i.e. pre-application)

- E-Portal/OPEX information orientation provided by Applicant to Staff reviewers was useful

In-Office Audit
(Safety)

- The conduct of the In-Office Audit remotely was effective and efficient in addressing NRC questions

- Use of the E-Portal improved and focused the NRC Staff's review of Applicant support information. However, there may be too much information and should be evaluated.

- In-Office Audit session schedule development should be improved and adhered to

- Timely question availability is essential to best breakout session outcomes (no follow-ups, focused RAIs, etc.)

- Use of pre-breakout session calls is a good practice and should continue

In-Office Audit (Breakout Sessions) (Safety)

- NRC questions would benefit from standardization
  - Fire Water questions are a good model (timeliness, OE, content, background, AMRs, etc) –i.e., Mechanical Reviews
  - Note efficiencies of NRC Electrical Team Review
  - Ensures GALL-SLR comment items addressed (Industry & NRC)
  - TLAA/Structural AMPs need to be moved to audit front end
- Propose use of E-Portal to post and status questions
- Skype was helpful to orient reviewers to information
- Use of various input methods (i.e. Supplement, 4D, RAI) for issues was good use of resources

Request for Additional Information (RAI) (Safety)

- Draft RAI discussions very beneficial and focused

- Time period from initial topic review until official RAI of 3-4 months seems excessive

- Consider use of Portal information to provide issue clarity for use in SER without the need for RAI

- Periodic conference calls were very important in maintaining open lines of communications

Environmental Review

- NEI/NRC development of 17-04 guidance for assessing SAMA "new and significant information" was useful
  - Additional NEI/NRC discussions are recommended to resolve inconsistent interpretations of NEI 17-04
- Efficiency improvement measures recommended for On-site Environmental Audits
  - More timely delivery of NRC questions/audit needs list to allow pre-Audit preparation of responses
  - Better definition of tour needs to improve planning for tour content and resources

Technical Issues
(Safety)

- Timeliness of supporting NRC reviews:
  - MRP-227, Rev. 1
  - PWROG Topical Report Reviews (EMA, Material properties, etc.)
  - Part 50 reactor surveillance capsule schedule change
  - Other plant specific changes (e.g. CFRP Relief)
- Interim Staff Guidance Recommended:
  - RPV Support Steel/Sacrificial Shield Wall Steel
  - EPRI Chemistry Revisions
  - Structural Stainless Steel/Aluminum cracking
  - Cu (Zn>15%) Cracking Inspection
  - M27 Table note 7, IWE UFSAR, etc.

Industry SLR Lessons Learned Summary

- Pre-submittal activities and meetings were useful
- Are there more efficient ways to achieve OPEX Audit outcomes?
- E-Portal/OPEX information orientation was useful
- Remote in-office Audit improved and focused NRC Staff's review of Applicant support information
- In-Office Audit session scheduling should be improved
- Use of various input methods was good use of resources
- NRC Audit questions would benefit from standardization
- Improve NRC timelines in reviewing documents related to the SLRA
- Timely availability of NRC questions is essential to ER review