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|---|--|--|-------------|--|---------------|
| <b>INTERAGENCY AGREEMENT</b>  |  | 1. IAA NO.<br>31310019F0035  |             | PAGE 1 OF 3  |               |
| 2. ORDER NO.  |  | 3. REQUISITION NO.<br>NRR-19-0105  |             | 4. SOLICITATION NO.                                  |               |
| 5. EFFECTIVE DATE<br>09/09/2019   |  | 6. AWARD DATE<br>08/27/2019  |             | 7. PERIOD OF PERFORMANCE<br>09/09/2019 TO 08/31/2020 |               |
| 8. SERVICING AGENCY<br>PACIFIC NORTHWEST NAT LAB<br>ALC:<br>DUNS: 000000000 +4:<br>US DEPARTMENT OF ENERGY<br>PACIFIC NORTHWEST SITE OFFICE<br>PO BOX 350 MS K9-42<br>RICHLAND WA 99352<br><br>POC [REDACTED]<br>TELEPHONE NO. [REDACTED]                               |  | 9. DELIVER TO<br>BERNARD GRENIER<br>US NUCLEAR REGULATORY COMMISSION<br>OFFICE OF NUCLEAR REACTOR REGULATION<br>11555 ROCKVILLE PIKE<br>ROCKVILLE MD 20852 |             |  |               |
| 10. REQUESTING AGENCY<br>ACQUISITION MANAGEMENT DIVISION<br>ALC: 31000001<br>DUNS: 040535809 +4:<br>US NUCLEAR REGULATORY COMMISSION<br>ONE WHITE FLINT NORTH<br>11555 ROCKVILLE PIKE<br>ROCKVILLE MD 20852-2738<br><br>POC Sandra Nesmith<br>TELEPHONE NO. 301415-6836 |  | 11. INVOICE OFFICE<br>US NUCLEAR REGULATORY COMMISSION<br>ONE WHITE FLINT NORTH<br>11555 ROCKVILLE PIKE<br>MAILSTOP 03-E17A<br>ROCKVILLE MD 20852-2738     |             |  |               |
| 12. ISSUING OFFICE<br>US NRC - HQ<br>ACQUISITION MANAGEMENT DIVISION<br>MAIL STOP TWFN-07B20M<br>WASHINGTON DC 20555-0001   |  | 13. LEGISLATIVE AUTHORITY<br>Energy Reorganization Act of 1974   |             |  |               |
|   |  | 14. PROJECT ID   |             |  |               |
|   |  | 15. PROJECT TITLE<br>REVIEW OF THE NINE MILE POINT NUCLEAR STATION UNIT  |             |  |               |
| 16. ACCOUNTING DATA<br>2019-X0200-FEEBASED-20-20D007-1030-11-4-149-253D-11-4-149-1030   |  |  |             |  |               |
| 17.<br>ITEM NO.   | 18.<br>SUPPLIES/SERVICES   | 19.<br>QUANTITY  | 20.<br>UNIT | 21.<br>UNIT PRICE                                    | 22.<br>AMOUNT |
|   | Agreement No. 31310019N0001<br>Task Order No. 31310019F0035<br><br>Title: Review of the Nine Mile Point Nuclear Station Unit 2, License Amendment Request to Implement 10 CFR 50.69 for Risk-Informed Categorization and Treatment of Structures, Systems, and Components (SSC)<br><br>The NRC and Pacific Northwest National Laboratory (PNNL) hereby enter into this Agreement for the project titled "Review of the Nine Mile Point Continued ... |  |             |  |               |
| 23. PAYMENT PROVISIONS  |  | 24. TOTAL AMOUNT<br>\$25,000.00  |             |  |               |
| 25a. SIGNATURE OF GOVERNMENT REPRESENTATIVE (SERVICING)   |  | 26a. SIGNATURE OF GOVERNMENT REPRESENTATIVE (REQUESTING)<br>           |             |  |               |
| 25b. NAME AND TITLE   | 25c. DATE  | 26b. CONTRACTING OFFICER<br>SANDRA R. NESMITH  |             | 26c. DATE<br>09/10/2019                              |               |

| IAA NO<br>31310019F0035  | ORDER NO | PAGE<br>2 | OF<br>3 |
|--|----------|-----------|---------|
| <p>Nuclear Station Unit 2, License Amendment Request to Implement 10 CFR 50.69 for Risk-Informed Categorization and Treatment of Structures, Systems, and Components (SSC)."</p> <p>Period of Performance: September 9, 2019 - August 31, 2020</p> <p>Consideration and Obligations:</p> <p>(a) Authorized Cost Ceiling \$125,375.00</p> <p>(b) The amount presently obligated with respect to this DOE Agreement is \$25,000.00. When and if the amount(s) paid and payable to the DOE Laboratory hereunder shall equal the obligated amount, the DOE Laboratory shall not be obligated to continue performance of the work unless and until the NRC Contracting Officer shall increase the amount obligated with respect to this DOE Agreement. Any work undertaken by the DOE Laboratory in excess of the obligated amount specified above is done so at the DOE Laboratory's sole risk.</p> <p>The following documents are hereby made a part of this Agreement:</p> <p>Attachment No. 1: Statement of Work</p> <p>This agreement is entered into pursuant to the authority of the Energy Reorganization Act of 1974, as amended (42 U.S.C 5801 et seq.). This work will be performed in accordance with the NRC/DOE Memorandum of Understanding dated November 24, 1998. To the best of our knowledge, the work requested will not place the DOE and its contractor in direct competition with the domestic private sector.</p> <p>[x] Fee Recoverable Work</p> <p>Docket No.: Unit 2 - 05000410<br/> EPID: To be provided<br/> CAC: 000976<br/> TAC: Nine Mile Point Unit 2<br/> Continued ...</p> |          |           |         |

[REDACTED]

NRC COR: Bernard Grenier,  
bernard.grenier@nrc.gov, 301-415-2726

DUNS: 040535809  
TAS: 31X0200.320  
ALC: 31000001  
Master IAA: 31310019N0001

# STATEMENT OF WORK

|  |  |  |   |
|--|--|--|---|
| <b>NRC Agreement Number</b><br><br>31310019N0001   | <b>NRC Agreement Modification Number</b><br><br> | <b>NRC Task Order Number (If Applicable)</b><br><br>31310019F0035  | <b>NRC Task Order Modification Number (If Applicable)</b><br><br> |
| <b>Project Title</b><br>Review of the Nine Mile Point Nuclear Station Unit 2, License Amendment Request to Implement 10 CFR 50.69 for Risk-informed Categorization and Treatment of Structures, Systems, and Components (SSCs) |  |  |   |
| <b>Job Code Number</b><br>Cost Center 1030   | <b>B&amp;R Number</b><br>11-4-149                | <b>DOE Laboratory</b><br>PNNL  |   |
| <b>NRC Requisitioning Office</b><br>Nuclear Reactor Regulation (NRR), Division of Risk Assessment (DRA)  |  |  |   |
| <b>NRC Form 187, Contract Security and Classification Requirements</b><br><input type="checkbox"/> Applicable<br><input type="checkbox"/> Not Applicable<br><input type="checkbox"/> Non-Fee Recoverable                       |  | <input checked="" type="checkbox"/> Involves Proprietary Information<br><input type="checkbox"/> Involves Sensitive Unclassified<br><input checked="" type="checkbox"/> Fee-Recoverable (If checked, complete all applicable sections below) |   |
| <b>Docket Number (If Fee-Recoverable/Applicable)</b><br>Unit 2 = 05000410  |  | <b>Inspection Report Number (If Fee Recoverable/Applicable)</b><br>N/A   |   |
| <b>CAC Number (If Fee-Recoverable/Applicable)</b><br>EPID (TBD)<br>CAC = 000976  |  | <b>Technical Assignment Control Number Description (If Fee-Recoverable/Applicable)</b><br>Nine Mile Point Unit 2   |   |

## 1.0 BACKGROUND

On November 22, 2004, the NRC added to its regulations Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems and Components [SSCs] for Nuclear Power Reactors" (69 FR 68008). This voluntary risk-informed alternative rule allows power reactor licensees and license applicants to apply a risk-informed categorization process to categorize SSCs based on their safety significance. The rule allows for licensees to adjust the treatment of previously non-safety-related SSCs to a higher category as well as safety-related ones to a lower category based on a risk-informed process. For those SSCs found to be of low safety significance, the rule allows the licensees to modify the special treatment requirements and implement alternative treatment to ensure that the SSCs continue to perform their safety function. Special treatment refers in the rule to those regulatory requirements that provide increased assurance, beyond normal industry practices, that SSCs perform their design basis functions, and consists of the following requirements: (i) 10 CFR part 21 regarding immediate reporting requirement of noncompliance and defects representing "substantial safety hazard"; (ii) a portion of 10 CFR 50.46a(b) regarding the design of vents and associated controls, instruments, and power sources and the need for these components to conform to 10 CFR 50 Appendix B; (iii) 10 CFR 50.49 regarding environmental qualification requirements; (iv) 10 CFR 50.55(e) regarding reporting requirement of design or manufacturing defects representing "substantial safety hazard"; (v) certain requirements of 10 CFR 50.55a regarding inservice inspection, and repair and replacement requirements; (vi) 10 CFR 50.65 for maintenance rule, except for paragraph(a)(4); (vii) 10 CFR 50.72 regarding immediate notification of report events involving certain SSCs; (viii) 10 CFR 50.73 regarding licensee event reporting system to report events involving certain SSCs.; (ix) Appendix B to 10 CFR part 50 regarding the quality assurance program; (x) certain containment leakage testing requirements; and (xi) certain requirements of Appendix A to 10 CFR part 100 regarding seismic qualification.

In May 2006 the NRC issued Regulatory Guide (RG) 1.201, Revision 1, "Guidelines for Categorizing Structures, Systems, And Components in Nuclear Power Plants according to Their Safety Significance, For Trial Use." RG 1.201 endorses a categorization method, with conditions, described in Nuclear Energy Institute (NEI) 00-04, Revision 0, "10 CFR 50.69 SSC Categorization Guideline". NEI 00-04 describes in detail a process for determining the safety significance of SSCs. This categorization process uses an integrated decision-making process which incorporates both risk and traditional engineering insights. NEI 00-04 guidance allows licensees to implement different approaches, depending on the scope of their probabilistic risk assessment (PRA). It allows the use of non-PRA type evaluations when PRAs have not been performed. These non-PRA type evaluations include fire-induced vulnerability evaluation (FIVE), seismic margin analysis (SMA), and guidance in Nuclear Management and Resource Council (NUMARC) 91-06, "Guidelines for Industry Actions to Assess Shutdown Management", to address shutdown operations.

The proposed amendment would revise the licensing basis for the Nine Mile Point Unit 2 to allow for the voluntary implementation of the regulation in 10 CFR 50.69, "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors."

The PRA Licensing Branch A (APLA) is responsible for reviewing all aspects of the risk-informed portion of the LARs with the exception of the use of seismic PRA, e.g. internal events, fire PRA. PRA Licensing Branch B (APLB) is responsible for reviewing the risk-informed portion of the LARs pertaining to the use of Seismic PRA. Both must make an independent assessment regarding the technical adequacy and the acceptability of the categorization process for the proposed amendment. Due to heavy workload, contractor assistance is required so as to complete the technical review and develop input for the safety evaluation report (SER) in a timely manner.

## **2.0 OBJECTIVE**

The objective of this task order is to obtain technical expertise from the Pacific Northwest National Laboratory (PNNL) to assist the NRC staff in determining the safety adequacy of the LAR by (1) verifying conformance of the licensee's categorization process with the relevant NRC-endorsed guidance; (2) validating that the quality of the licensee's PRA models is adequate for use in the application and (3) confirming that any non-PRA methods used for evaluating the risk from external hazards are consistent with those allowed in NEI 00-04 and consider the current as-built, as-operated plant.

## **3.0 SCOPE OF WORK**

PNNL must review the risk-informed sections of the LAR to assess the PRA quality and technical adequacy, to review the categorization process, to identify the need for additional information (RAIs), as necessary, and prepare a technical evaluation report (TER), as described in Section 4.0 "Specific Tasks" and Section 5.0 "Deliverables" below.

## **4.0 SPECIFIC TASKS AND MILESTONES SCHEDULE**

PNNL must perform the following tasks:

| <u>Tasks</u>   | <u>Completion Schedule</u> |
|--|----------------------------|
| 1. Based on RG 1.200, Revision 2, evaluate the technical adequacy of the licensee's PRA models proposed to be used in the categorization process. Review the closeout of Facts and Observations (F&O). For open F&O, ensure that the licensee had properly evaluated their impact to the total risk. Confirm that any non-PRA methods proposed for use in the categorization process are consistent with those allowed in NEI 00-04, as qualified by RG 1.201, Revision 1, and consider the current as-built, as-operated plant. Evaluate the alternate seismic approach proposed by the licensee for use in categorization consistent with prior review of such an approach by the NRC staff. Confirm that the licensee's categorization process is consistent with the categorization process described in NEI 00-04, as endorsed, with clarifications in RG 1.201 |                            |

Revision 1. Identify the need for additional information or clarification and prepare a technical letter report (TLR) of recommended RAI(s), as applicable. Prepare a Technical Evaluation Report (TER); see Section 5.0 below.

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| a. Draft TLR of recommended RAI(s) and Draft TER.  | Four weeks after authorization of work.        |
| b. Incorporate NRC comments and prepare final TLR of recommended RAI(s) and TER.   | One week after receipt of NRC comments.        |
| 2. Review the RAI response(s) and supplement(s) to the LAR, as applicable, and determine if the response(s) adequately addresses the RAI(s) or open items. If the response(s) is deemed not acceptable, prepare a TLR(s) of recommended follow-up RAI(s), see Section 5.0 below. The COR may determine that a conference call(s) or public meeting(s) is needed to discuss the RAI response(s) or the recommended follow-up RAI(s) with the licensee in which case the PI will be notified and expected to participate. Note that the RAI responses reviewed under this task are associated with the first round of RAIs and any additional rounds of RAIs, therefore, multiple TLRs may be delivered under this task. |  |
| a. Draft TLR(s) of recommended follow-up RAI(s).   | Two weeks from receipt of the RAI response(s). |
| b. Incorporate NRC comments and prepare final TLR(s) of recommended follow-up RAI(s).  | One week after receipt of NRC comments.        |
| 3. Upon notification by the COR, update the TER; see Section 5.0 below. For any RAIs not adequately addressed, list the item as an open item in the TER. Propose language for implementation items, as necessary.  |  |
| a. Draft TER.  | Two weeks from COR notification.               |
| b. Incorporate NRC comments and prepare the final TER.   | One week after receipt of NRC comments.        |

### Participate in an On-Site Audit

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|---|--|
| a. Prepare a TLR consisting of input to the audit plan.   | One week from COR notification.        |
| b. Prepare for the audit by reviewing the draft TER and RAIs.   | One week prior to the scheduled audit. |
| c. Travel to the audit location and participate in the audit in accordance with LIC-111, "Regulatory Audits," to review the areas reviewed under Tasks 1 and 2, as applicable. Identify the need for any additional information or clarifications. Prepare technical letter reports as follows: |  |
| (1) Prepare on-site RAIs.   | One day prior to the exit Meeting.     |
| (2) Prepare a trip report.  | One week after the Audit.              |

## **5.0 DELIVERABLES**

PNNL is responsible for structuring the deliverable to follow agency standards. The current agency standard is Microsoft Office Suite 2013. The current agency Portable Document Format (PDF) standard is Adobe Acrobat XI Professional. Deliverables must be submitted free of spelling and grammatical errors and conform to requirements stated in this section.

### ***Monthly Letter Status Reports***

PNNL must provide a Monthly Letter Status Report which consists of a technical progress report and financial status report. This report will be used by the NRC to assess the adequacy of the resources utilized by PNNL to accomplish the work contained in this SOW and to provide status of PNNL's progress in achieving tasks and producing deliverables. The report shall include agreement/order summary information, work completed during the specified period, milestone schedule information, problem identification and resolution, travel plans, and staff hour summary. Copies must be sent to the COR and AMD at [ContractsPOT.Resource@nrc.gov](mailto:ContractsPOT.Resource@nrc.gov).

### ***Technical Reporting Requirements***

1. As part of Task 1, submit a TLR containing recommended RAIs, as applicable, and a TER. If there are RAIs, the TER should include "place-holders" for where this RAI information is required and the bases for the RAIs. The TER should be in accordance with the format, outline, and content provided by the NRC COR; see "Assumptions and Understandings" in Section 15, "Other Considerations." The report must discuss the PRA technical adequacy for the internal events PRA and the acceptability of the methods used to address seismic



events as well as other external events and whether these methods consider the current as-built, as-operated plant.

2. As part of Task 2, if there are follow-up RAIs, submit the TLR(s) containing the recommended RAIs.
3. As part of Task 3, upon notification by the COR, submit the TER, draft and final as appropriate, to include the bases for acceptance of RAI responses and discussion of any open items.
4. As part of Task 4, provide a TLR consisting of input to the audit plan, and prepare RAIs during audit if the need for any additional information is identified. At the completion of Subtask 4.c.(2), submit a trip report that contains a summary of the activities performed during the audit and a summary of significant highlights, observations, insights, and findings. Include the title and description of any documents, slides, or other materials reviewed on the trip. As appropriate, describe possible resolution of the findings/observations, noting disposition responsibility (if appropriate) of the items presented and reviewed.

## **6.0 TECHNICAL AND OTHER SPECIAL QUALIFICATIONS REQUIRED**

One Senior Reliability and Risk Analyst to act as the Principal Investigator who must possess knowledge and experience in the disciplines and technical area related to the design, construction, operation, maintenance and inspection of nuclear power plants. The knowledge and experience is usually gained by working in a technical systems, design or operations position at a nuclear utility licensee, vendor or architectural/engineering firm, or the equivalent.

The Reliability and Risk Analyst must have a fundamental understanding of risk-informed activities which can be used to achieve NRC's regulatory objectives and overall responsibilities by:

1. Understanding and having experience with general PRA methods and techniques including system and function modelling using fault and event trees, use of NRC SAPHIRE software or industry equivalent software, common cause failures, human failure probabilities and the relative importance of the different inputs on PRA results.
2. Having a thorough understanding of risk and nuclear power plant technology.
3. Understanding and experience in one or more specialized PRA techniques such as success criteria development, containment failure analysis, and/or location dependent hazards analyses (e.g., flooding and fire).
4. Having a working knowledge of the structure, content, and use of the ASME/ANS consensus standard and the associated peer review process.
5. Being familiar with current and pending risk-informed license applications and the role of PRA in adequacy/activities as well as fundamental reactor insights from IPE, IPEEE, NFPA-805, etc.

6. Understanding the risk-informed decision-making process and risk-informed performance-based regulation and their requirements for implementation.

The Reliability and Risk Analyst must have a fundamental knowledge of and demonstrated experience in using or otherwise applying the guidance contained in the following references:

- Regulatory Guide (RG) 1.174 “An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions of Plant-Specific Changes to the Licensing Basis”
- RG 1.175 “An Approach for Plant-Specific, Risk-Informed Decision making: Inservice Testing”
- RG 1.177 “An Approach for Plant-Specific, Risk-Informed Decision making: Technical Specifications”
- RG 1.178 “An Approach for Plant-Specific, Risk-Informed Decision making: Inservice Inspection”
- RG 1.200, “An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities”.
- Federal Register, 8/21/86, "Safety Goals for the Operations of Nuclear Power Plants: Policy Statement" 51 FR 30028
- Federal Register, 8/8/85, "Policy Statement on Severe Reactor Accidents regarding Future Designs and Existing Plants" 51 FR 32138
- Federal Register, 8/16/95 "Use of Probabilistic Risk Assessment Methods in Nuclear Regulatory Activities: Final Policy Statement" 60 FR 42622

Note: More than one Risk Analyst may be assigned  
but within the same level of effort.

## **7.0 KEY PERSONNEL**

PNNL proposes the following personnel for this task order:

[REDACTED]

[REDACTED]

[REDACTED]

## **8.0 MEETINGS AND TRAVEL**

One two-person, four-day trip to the licensee’s main office site in Kenneth Square, PA.

## 9.0 PERIOD OF PERFORMANCE

The period of performance for this task order is September 9, 2019 – August 31, 2020.

## 10.0 CONTRACTING OFFICER'S REPRESENTATIVE

The COR monitors all technical aspects of the agreement/task order and assists in its administration. The COR is authorized to perform the following functions: assure that PNNL performs the technical requirements of the agreement/task order; perform inspections necessary in connection with agreement/task order performance; maintain written and oral communications with PNNL concerning technical aspects of the agreement/task order; issue written interpretations of technical requirements; monitor the PNNL's performance and notify the CO of any deficiencies; coordinate availability of NRC-furnished material.

Contracting Officer's Representative: Bernard L. Grenier  
Mail Stop: O-10F2  
Washington, DC 20555-0001

E-Mail: [Bernard.Grenier@nrc.gov](mailto:Bernard.Grenier@nrc.gov) Phone: 301-415-2726

Alternate COR: [Jay.Robinson@nrc.gov](mailto:Jay.Robinson@nrc.gov) Phone: 301-415-2878

Technical Reviewers: ; [De.Wu@nrc.gov](mailto:De.Wu@nrc.gov), [Shilp.Vasavada@nrc.gov](mailto:Shilp.Vasavada@nrc.gov),

## 11.0 MATERIALS REQUIRED

N/A

## 12.0 NRC-FURNISHED PROPERTY/MATERIALS

The Nine Mile Point Unit 2 50.69 LAR may be retrieved from the NRC Public Web Site at ADAMS Accession Number ML\_\_\_\_\_.

NOTE: Some of these documents contain proprietary information and must be safeguarded against unauthorized disclosure. After completion of work, the documents should either be destroyed or returned to NRC. If they are destroyed, please confirm this in an E-mail to the COR and include the date and manner in which the documents were destroyed.

The NRC COR will provide those NRC documents related to licensing activities (for example, any Non-Publicly available SERs, audit reports, and related documents) that are readily available. The NRC COR will provide access to material pertinent to the LAR or other NRC documents and docketed correspondence on related issues. PNNL shall identify any additional

NRC documentation needed and the COR will determine whether these will be provided by the NRC or obtained directly by PNNL from ADAMS, NRC public document room or the NRC website at [www.nrc.gov](http://www.nrc.gov).

### **13.0 RESEARCH QUALITY**

N/A

### **14.0 STANDARDS FOR CONTRACTORS WHO PREPARE NUREG-SERIES MANUSCRIPTS**

N/A

### **15.0 OTHER CONSIDERATIONS**

#### Assumptions and Understanding

1. It is understood that the level of effort for each task contains sufficient effort to conduct telephone conference calls with the NRC staff. Such phone calls, for example, might be arranged by the NRC COR with the Licensing Project Manager and other NRC staff to discuss the RAIs and to reach an understanding with the licensee; or, they may be technical discussions with the Technical Reviewer(s) on particular matters within the scope of work, e.g., RAI or RAI response issues.
2. Capability Category II of the American Society of Mechanical Engineers (ASME) PRA standard shall be applied as the standard for assessing quality of the licensee's PRA models. The licensee should have its PRA assessed against Revision 2 of RG 1.200.
3. It is anticipated that there will be one round of RAIs for a typical LAR review; however, the tasks are structured to allow for two or more rounds.
4. The assumption for the level of effort for Task 4 is based upon one day for preparation and travel to the site, two days for the audit, and one day for return travel and preparation of the trip report.

#### Guidance for Preparing Requests for Additional Information (RAIs)

Additional information necessary to resolve open or unresolved items identified during the review of the information associated with the LAR needs to be requested in a manner that is unambiguous, has an adequate basis, and is necessary for the safety review. RAIs should be developed using the following guidance:

1. An RAI should include the appropriate basis for requesting the information. The basis should explain why the information is needed, including how it will be used to help make a reasonable assurance finding.

2. Judgmental language should be avoided.
  - a. Questions should not make adequacy determinations.
  - b. Words like “unacceptable” or “deficient” and “deviation” should be avoided. Likewise, avoid using phrases like “*the staff will require*” since it is premature to require anything when asking questions.

#### Guidance for Preparing Requests for Additional Information (RAIs)

3. Questions should be focused, not open-ended.
  - a. The RAI should be in the form of a question or an imperative to provide what is needed to complete the review. When the reviewer needs specific information, or the underlying issue may not be apparent, the RAI should clearly identify the information requested and/or the underlying issue.
  - c. “If ... then” questions (questions that could lead to follow-on questions) should provide both parts of the question.

After the RAIs have been forwarded to the applicable NRC Project Manager, teleconferences and/or public meetings may be held before issuing the RAIs:

- a. These discussions prevent misunderstandings of the intent of the questions.
- b. If a draft RAI is clarified or resolved before issuance, the NRC staff will prepare a documented record of the resolution (i.e., minutes of a public meeting or a teleconference summary).

After the RAIs have been issued, the applicant may request a telephone conference and/or a public meeting:

- a. The teleconferences and/or meetings provide additional clarification of the intent of the RAIs and will help the licensee prepare satisfactory responses.
- b. To ensure that the response appropriately addresses the RAI, the licensee may submit a draft response (which the NRC docket in the ADAMS) and may request a follow-up teleconference and/or meeting.

After receiving RAI response from the licensee, the NRC may hold a teleconference and/or a public meeting:

- a. The purpose of discussing a response with the licensee is to better understand the response and/or clarify areas of disagreement. If the resolution of a response relies on information not submitted to the NRC, the licensee should submit the information on the

docket. The submission is not intended to be another RAI or a means to minimize the number of SER open items, but frequently reduces the number of SER open items.

- b. If the areas of disagreement remain, the unresolved RAI becomes an SER open item.

#### **NOTE THE REQUIREMENT FOR ANY FOLLOW-UP RAIs:**

For follow-up RAIs, reference the original RAI, the date of the letter in which the licensee responded to the RAI, and the ADAMS Accession Number of the letter.

"In a letter dated \_\_\_\_\_ (ADAMS Accession No. MLXXXXXXXX), the licensee responded to \_\_\_\_\_ RAI \_\_\_\_\_ and stated \_\_\_\_\_."

#### **References**

- U.S. Nuclear Regulatory Commission, Regulatory Guide 1.174, Revision 3, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," May 2011 (ADAMS Accession No. ML100910006).
- U.S. Nuclear Regulatory Commission, Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," March 2009 (ADAMS Accession No. ML090410014 and ML090410018).
- ASME/ANS RA-Sa-2009, Addenda to ASME RA-S-2008, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications."
- U.S. Nuclear Regulatory Commission, Regulatory Guide 1.201, Revision 1, "Guidelines For Categorizing Structures, Systems, And Components In Nuclear Power Plants According To Their Safety Significance, For Trial Use," May 2006 (ADAMS Accession No. ML061090627).
- Nuclear Energy Institute (NEI) 00-04, Revision 0, "10 CFR 50.69 SSC Categorization Guideline," July 2005 (ADAMS Accession No. ML052900163).

#### **Access to Non-NRC Facilities/Equipment**

N/A

#### **Applicable Publications**

N/A