



TR Modernization Process Update

Topical Report Transformation Working Group

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October 23, 2019

Purpose

Bottom line: the implementation of an integrated, combination of approaches to improve the timeliness of topical report (TR) reviews.

Purpose: Provide an overview of options, courses of action, and recommended path forward for TR process transformation.



Background

- Topical Reports in licensing
 - Not required
 - Single staff review of a safety-related topic
 - Low priority
- Most are new technology, methodology, or process
- Industry concerns about timeliness of reviews
- Budgeted resources for TR historically did not cover need
- TR Transformation Working Group established



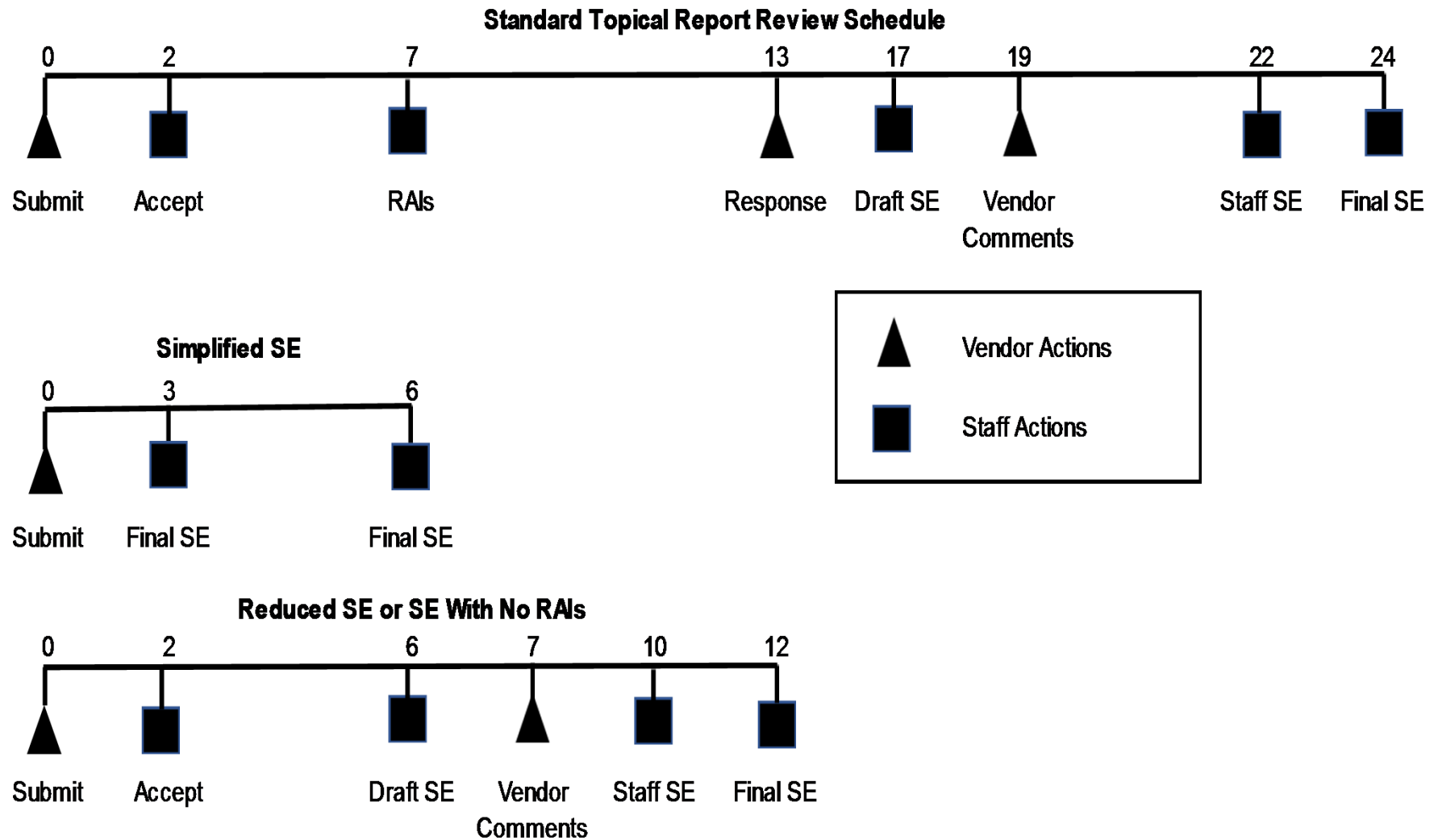
Current TR Process Observations

- Same review regardless of
 - TR complexity
 - New topic or TR revision
 - Large or small TR
- Variations in TR
 - Vendor submissions can vary in quality
 - Staff resources required to complete the review
- Multiple rounds of RAIs are often needed to complete the SE

List of Options

Option	Brief Description
Status Quo	No change in current process
Simplified and Limited SE	Standard form (3-4 pages) or reduced SE documentation
Modified Reviews	Accept or deny; Prepare draft SE with open items for vendor to address with RAIs in only minimal circumstances
Tiger team reviews	Perform on-site audit and prepare draft SE with open items
Submittal documentation	Not require RAIs for all information from vendors
Administrative process	Editing and administrative processes add time
Eliminate -A version	End review when final SE is issued
Dedicate Branches	Pre-assign dedicated staff to TR Review Branch

Timelines for Current and Proposed Topical Reviews



Analysis of Options

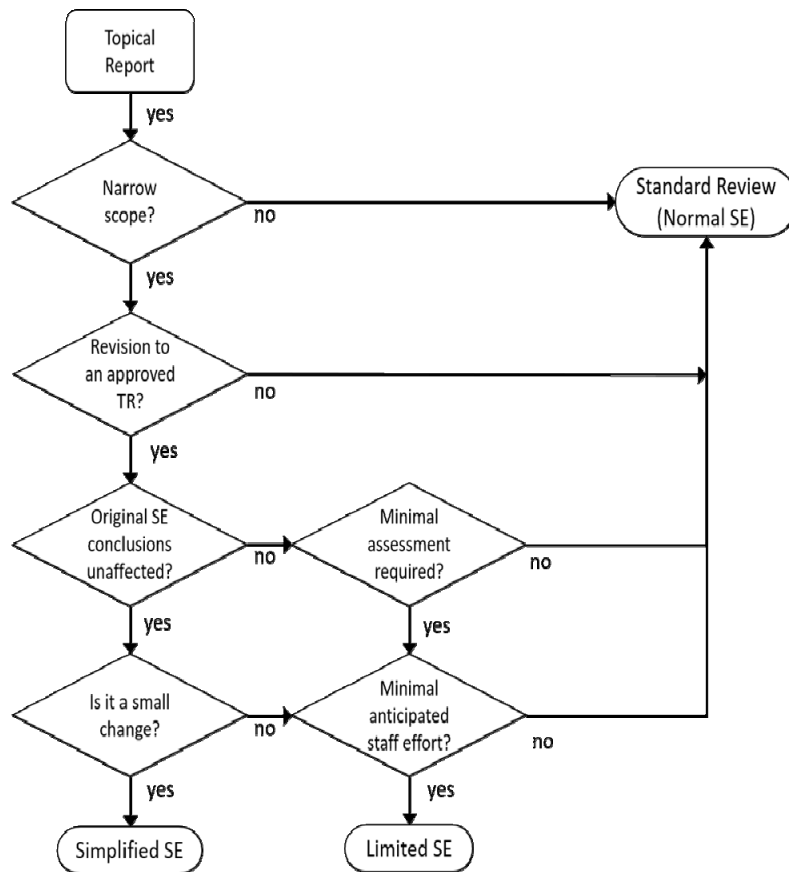
Option	Potential Time to SE	Pros	Cons	Recommend	Implementation Period
Status Quo	Varies, lengthy	<ul style="list-style-type: none"> • Known process • Does achieve reviews 	<ul style="list-style-type: none"> • Concerns about timeliness • Need to husband scarce resources • One size fits all 	Keep	N/A
Simplified and Limited SE	3-12 months	<ul style="list-style-type: none"> • Reduce review time • Focus resources on risk significant TRs • Submit smaller changes which get reviewed faster • TR update process • Distinction based in TR complexity 	<ul style="list-style-type: none"> • Difficult to establish the reduced scope. • Difficult to project appropriate SE • Challenging to limit staff hours 	Yes, pilot	Short term
Modified Review	12 Months	<ul style="list-style-type: none"> • Vendor burden • RAIs are only issued if draft SE items not closed • Keeps schedule 	<ul style="list-style-type: none"> • External pressures to continue work • Staff and vendor want TR 	Yes, pilot	Short term

Analysis of Options (cont.)

Option	Potential Time to SE	Pros	Cons	Recommend	Implementation Period
Tiger team reviews	12 Months	<ul style="list-style-type: none"> • Draft SE complete • RAls if needed • Shorter reviews 	<ul style="list-style-type: none"> • Not all TRs • Need right TR and staff • Billing for travel 	Yes, Pilot	Short Term
Submittal documentation	Varies	<ul style="list-style-type: none"> • Reduce RAls • Significant time savings 	<ul style="list-style-type: none"> • Potential confusion • Information tracking 	Yes	Short Term
Administrative process	Varies	<ul style="list-style-type: none"> • Improve timeliness • Accurate budget 	<ul style="list-style-type: none"> • AA staff overloaded • Priorities shift • Focus for cuts 	Yes	Short term
Eliminate -A version	None	<ul style="list-style-type: none"> • Some resource savings • Time savings 	<ul style="list-style-type: none"> • TRs could be changed • Review time not shortened 	No	N/A
Dedicated TR Branches	None	<ul style="list-style-type: none"> • Establishes special teams • Avoids competing priorities 	<ul style="list-style-type: none"> • TR workload may not justify 	No	N/A

Recommended Combination of Options – Short Term

Establish a flow diagram and associated guidance in LIC-500 to enable to appropriate SE for each review.



- Simplified SE
 - no new regulatory finding
 - confirming previous NRC finding is still applicable.
 - minimal documentation (e.g., a few sentences)
 - 3 - 6 months to complete review
- Limited SE
 - new regulatory finding
 - finding is of very limited scope and requires minimal assessment.
 - some documentation (e.g., a few pages)
 - 6 - 9 months to complete review
- Normal SE: Current process
- Reduced documentation
- Administrative processes: Document processing and editing

Path Forward

	FY 2020											
Activity	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
LIC-500 Update #1 OGC Rule												
Pilot Simplified SE												
Public Workshop												
Pilot Reduced SE												
Admin Process Discussion												
LIC-500 Update #2												
- Write New Procedure												
-LT Review												
- Training (if needed)												
-Implementation												

- Simplified SE Pilot
 - Digital I&C TR change (October 2019)
 - Second TR is being considered for pilot
- Reduced SE Pilot Submittal in October 2019
- Tiger Team review ongoing
 - March – Review began
 - September – Final Draft SE

Simplified SE Standard Form Concept

Office of Nuclear Reactor Regulation Simplified Topical Report Safety Evaluation			
Topical Report Information		Review Information	
Report Number:		Division/ Branch:	
Title:		Project Manager:	
EPID:		Reviewers:	
Docket No.:			
Staff Hours:	Technical Reviewers Total	Project Manager	
Use of Simplified Safety Evaluation			
Is this the review of very limited scope?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
Is this a revision to an accepted Topical Report?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
Does the TR change maintain the original SE conclusions?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
Is this a small change?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
If any of the above questions are answered no, a simplified safety evaluation cannot be used.			
Applicable Review Guidance Used			
Description of Topical Report Content (1000 Word Maximum)			

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Office of Nuclear Reactor Regulation Simplified Topical Report Safety Evaluation	
Topical Report Information	Review Information
Report Number:	Division/ Branch:
Title:	Project Manager:
EPID:	Reviewers:
Docket No.:	
Technical Evaluation (Limited to space provided)	

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Simplified SE Standard Form Concept (cont.)

Office of Nuclear Reactor Regulation Simplified Topical Report Safety Evaluation			
Topical Report Information		Review Information	
Report Number: Title: EPID: Docket No.:		Division/ Branch: Project Manager: Reviewers:	
Conclusions			
Conditions and Plant-Specific Action Items			
Approval	Printed Name	Signature	Date
Technical Branch Chief			
PLPB Branch Chief			