

COM-106 Program Revitalization Technical Assistance Request

TAR

Office of Nuclear Reactor Regulation (NRR)

Category 2 Public Webinar with NEI and Industry

To discuss comments on

Draft updated office instruction COM-106

July 27, 2020

TIA

Task Interface Agreement



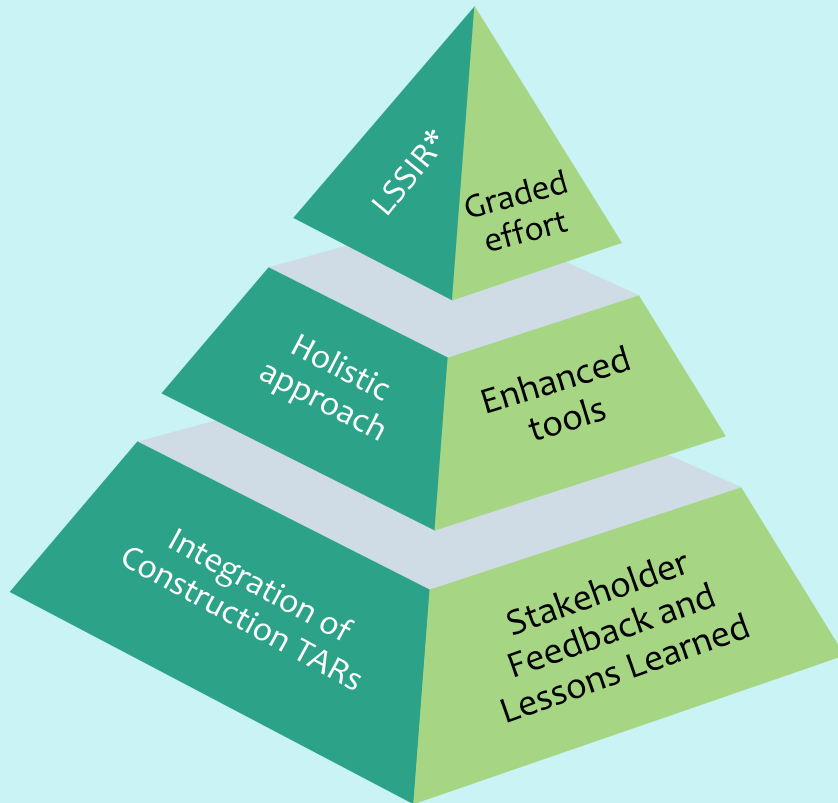
AGENDA

- Opening Remarks.... Division Management, NRR, Division of Operating Reactor Licensing (DORL)
- Staff Overview Presentation..... NRR
 - Booma Venkataraman
 - Alex Schwab
- Discussions..... NRR with NEI and Industry
- Opportunity for Public Comments
- Closing/ Summary



TECHNICAL ASSISTANCE REQUEST (NRR COM-106) -HIGHLIGHTS

TIA (TAR)



TIA RESTRUCTURED!

As a fact-gathering exercise to inform decisionmaking in other processes (e.g., enforcement, backfitting), it offers:

- **modernization** (e.g., holistic solutions)
- a graded, **risk-informed** approach
- enhanced effectiveness and timeliness



COM-106 REVITALIZATION STAKEHOLDER TOUCH POINTS

NRC working group kicked off on Jan 31, 2019

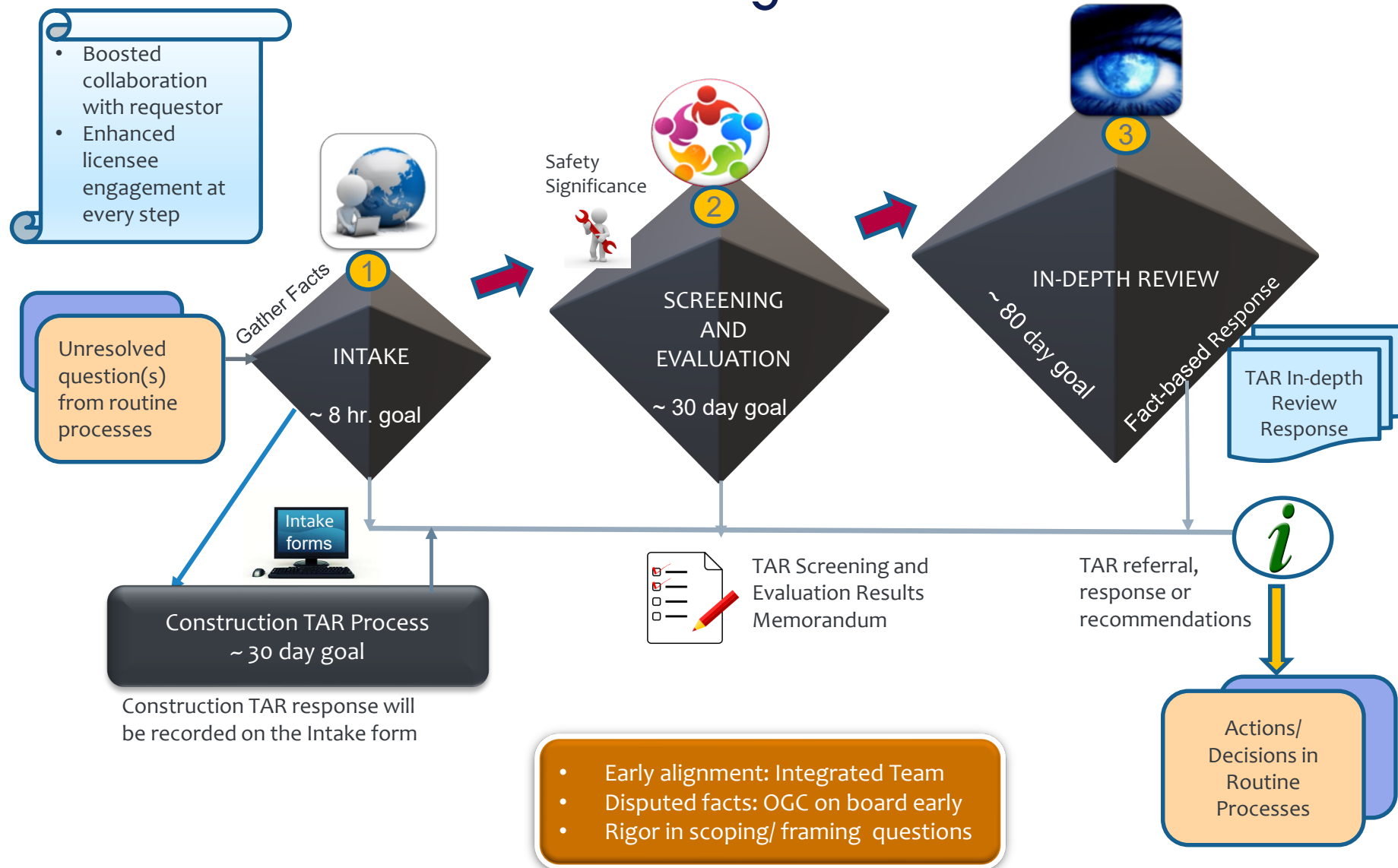
- Public engagements with industry were held on March 19, May 29, and Nov 7, 2019.
- The Nov 7, 2019 meeting featured table-top style discussions on the proposed process.
- An interim draft version of the COM-106 guidance was made publicly available on Dec 5, 2019¹ for general awareness.
- Feedback sought/ Training for staff May- Dec, 2019 and in June 2020- NRR and Regions.
- NEI provided general comments on Feb 11, 2020², on the interim draft for NRC's consideration and discussion at a future public engagement.
- An updated draft version of the COM-106, was made publicly available on July 9, 2020³, in a public teleconference.
- This webinar is for discussing industry and public comments on the draft COM-106 issued on July 9, 2020.

¹ ADAMS Accession No. ML19338E029.

² ADAMS Accession No. ML20043F478.

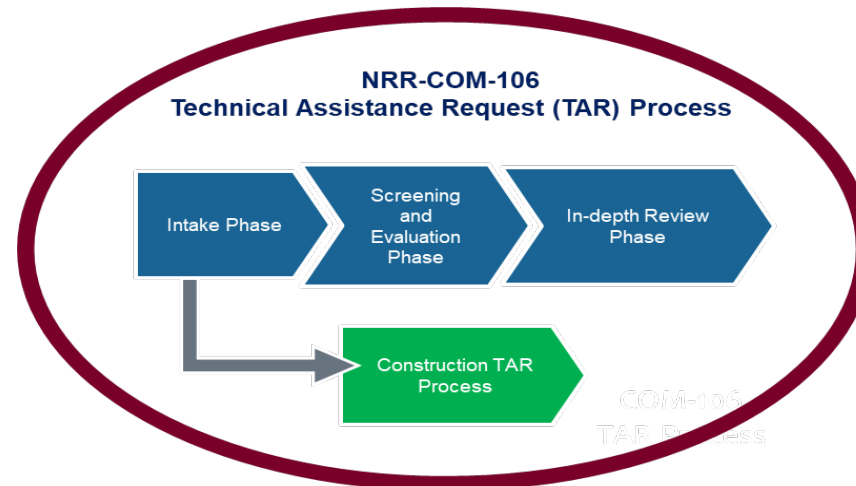
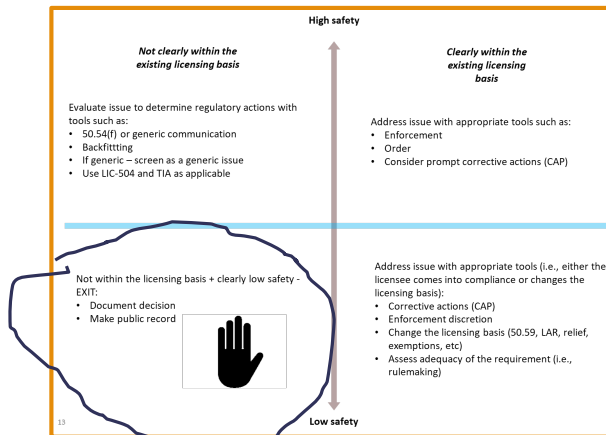
³ ADAMS Accession No. ML20178A474.

3-Phase Graded Approach and Construction TAR Process Integration



VLSSIR-TAR-BACKFIT NEXUS

Integrated
Decisionmaking
principles

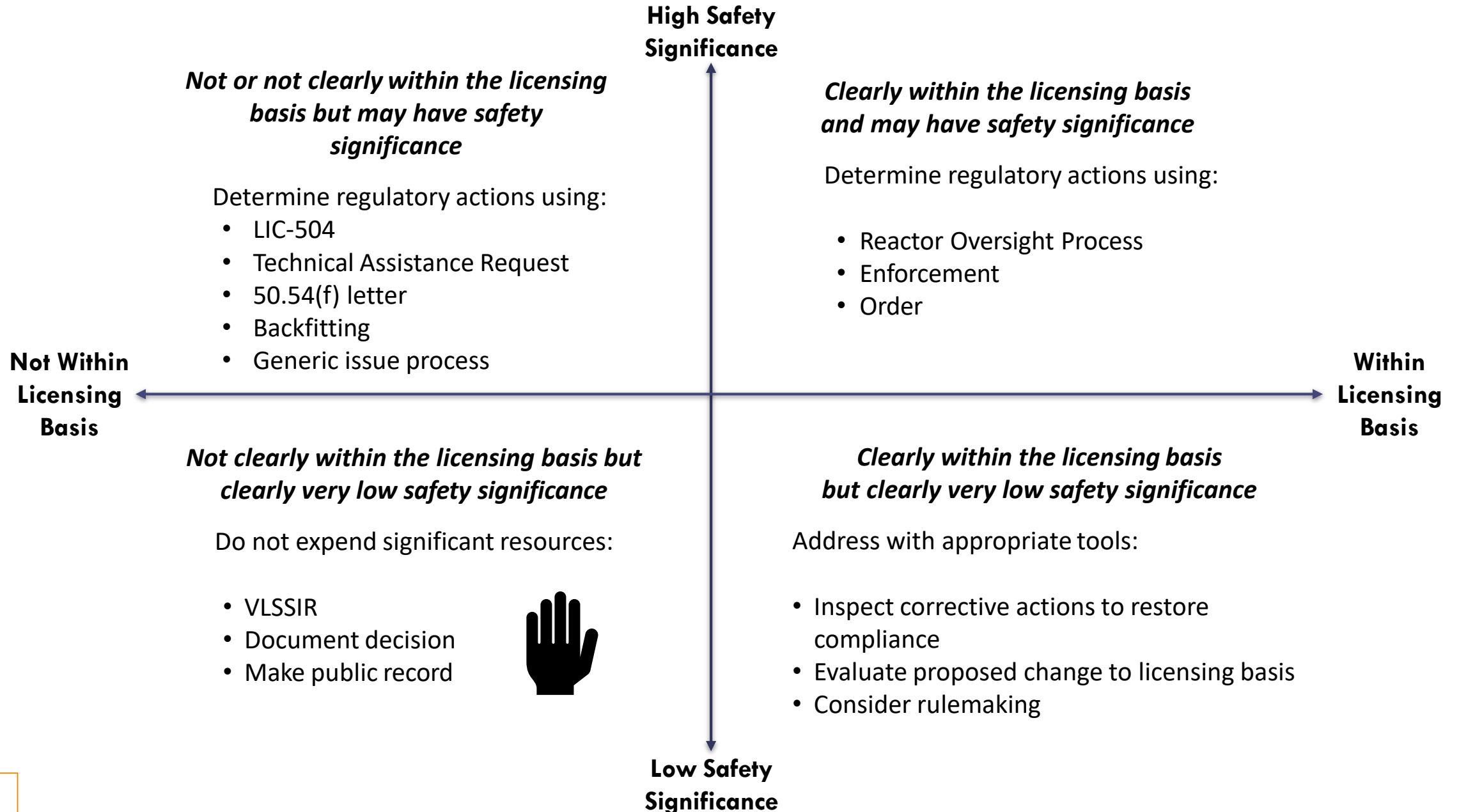


Backfit Process
MD 8.4,
NUREG-1409,*
NRR/NMSS Office
Instructions*
*Under development

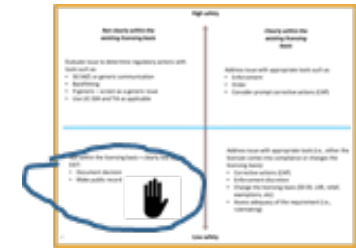
Holistic Solutions with Safety Significance Considerations

VLSSIR: Very Low Safety Significance Issue Resolution (in the Reactor Oversight Process (ROP))

Issue Mapping: Licensing Basis Standing and Safety Significance



VLSSIR* CRITERIA: GUIDANCE IN IMC 0612, APPENDIX B (ISSUE SCREENING)

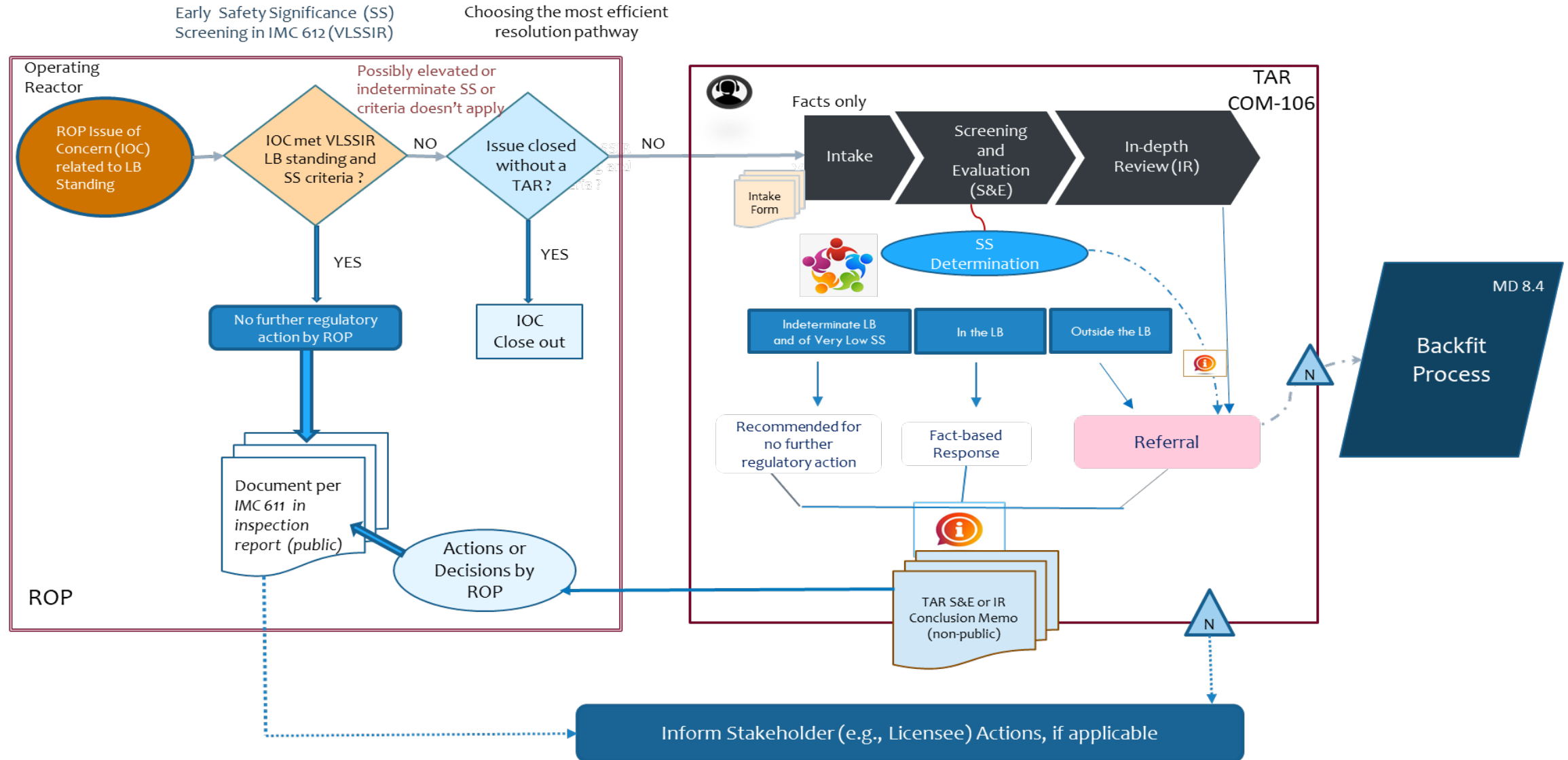


- ☐ **If the current licensing basis question cannot be determined without a significant level of effort, then the issue may be closed as part of the VLSSIR process. This process can be used if all of the following are met:**
 - ✓ The licensee has demonstrated, by providing a supporting basis, why the issue of concern is not in its current licensing basis; and
 - ✓ The inspector (using the resource estimate in the applicable inspection procedure as a guideline and which may involve NRC Headquarters support) has not been able to conclude the issue of concern is part of the plant's licensing basis;
 - ✓ The issue (if it were assumed to be an inspection finding) has been confirmed as very low safety significance (would not have proceeded to a “detailed risk evaluation,” a Phase 2 evaluation when relevant, or Appendix M, if processed through IMC 0609, “Significance Determination Process” as a performance deficiency); and
 - ✓ Branch Chief concurrence that spending more time in researching the current license basis is not likely to benefit public health and safety relative to other inspection activities.

☐ **If all of the above are met, document as:**

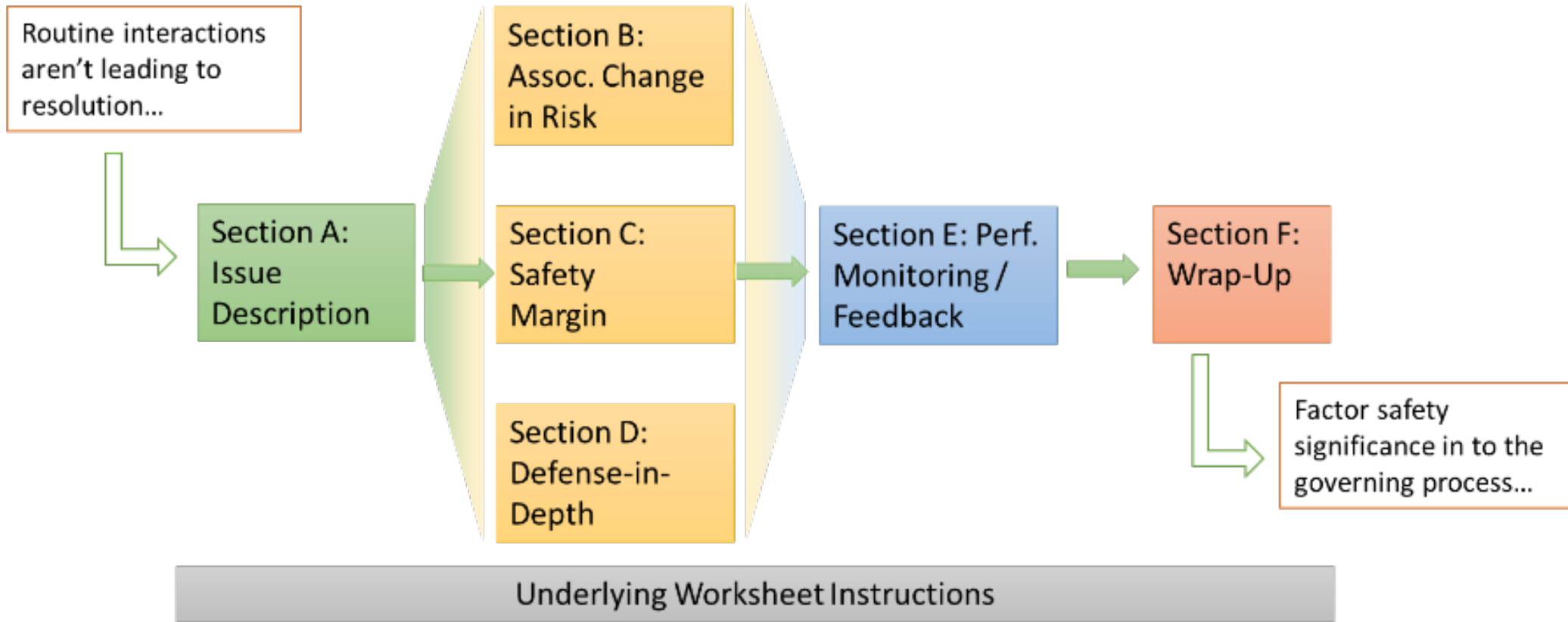
IAW IMC 0611-12, “Minor Performance Deficiencies, Minor Violations, Observations, Assessments, and Very Low Safety Significance Issues”

Journey of an Inspection Issue with a Licensing Basis (LB) Standing Question



TAR: SAFETY SIGNIFICANCE DETERMINATION TOOL (IN SCREENING & EVALUATION)

Integrated
Decisionmaking





COM-106 JOURNEY NEXT STEPS (ESTIMATED TIMELINE)

Public industry engagement:

July 2020

Completion of COM-106 update:

Aug 2020

DRAFT COM-106

DISCUSSION WITH NEI/INDUSTRY

PUBLIC COMMENTS

CLOSING REMARKS/ SUMMARY

Stay safe, and
healthy!

Thank You 😊

