

ISG-06 Alternate Review Process

Industry ARP Feedback

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ARP Feedback Topics

- Pre-submittal Meetings
- Vendor Oversight Plan (VOP) and LAR VOP Summary
- Electronic Reading Rooms
- NRC Vendor QA Branch Inspections
- Summary



Presubmittal Meetings

- Presubmittal meetings provided the opportunity to discuss:
 - Technical topics for which licensee needs feedback to mitigate project risk
 - Use and limitation of precedent licensing actions
 - LAR contents since all LARs are unique
- Industry is very pleased with the amount of preapplication NRC interaction allowed for DI&C LARs

Presubmittal Meetings

- Topics included:
 - Vendor Oversight Plan (VOP)
 - LAR VOP summary
 - Use of approved digital platform topical reports
 - Plant/Application Specific Action Items
 - What P/ASAs are covered by the VOP vs. regulatory commitment
 - How platform changes since topical report approval are addressed





Presubmittal Meetings (cont.)

- Topics included (cont.)
 - System Architecture
 - ◆ System interfaces including data communications
 - ◆ Human-System Interface changes
 - ◆ Plant modification impact on current NPP Defense-in-Depth and the LAR approach to addressing CCF

Present architecture information to be contained in LAR for level of detail



Presubmittal Meetings (cont.)

- Presubmittal meeting devoted to draft LAR
 - Conducted before submittal
 - Allowed for NRC feedback on possible gaps that could prevent acceptance
 - Confirms content and level of detail



Presubmittal Meetings (cont.)

- Future considerations
 - Ensure all applicable NRC review branches are represented
 - Confirm LAR contents, i.e., identify augmented information based on modification specifics
 - ◆ TS surveillance requirement reductions
 - ◆ Significant MCR changes



Presubmittal Meetings (cont.)

- Future considerations
 - NRC has commented that LAR review processes (e.g., ARP, Tier 1) are not necessarily distinct – industry would like clarity
 - ◆ Including impact of design lifecycle schedule in relationship to ARP (NRC licensing process)

Vendor Oversight Plan (VOP) and LAR Summary

- ISG-06 provided little guidance on what should be contained in the LAR to describe the VOP
- Presubmittal meetings should be used to determine level of detail for LAR VOP summary
- For one project, a LAR supplement was required to provide a revised VOP Summary after NRC review of the VOP
- Industry needs to understand regulatory basis or guidance for VOP Summary
- One lesson learned – utilize Licensee’s 10 CFR 50 Appendix B QA implementing procedures for the VOP and cite them in the LAR VOP summary



Electronic Reading Rooms

ERRs facilitate remote auditing of documents for NRC review

Some projects require separate ERRs for licensee vs. vendor documentation

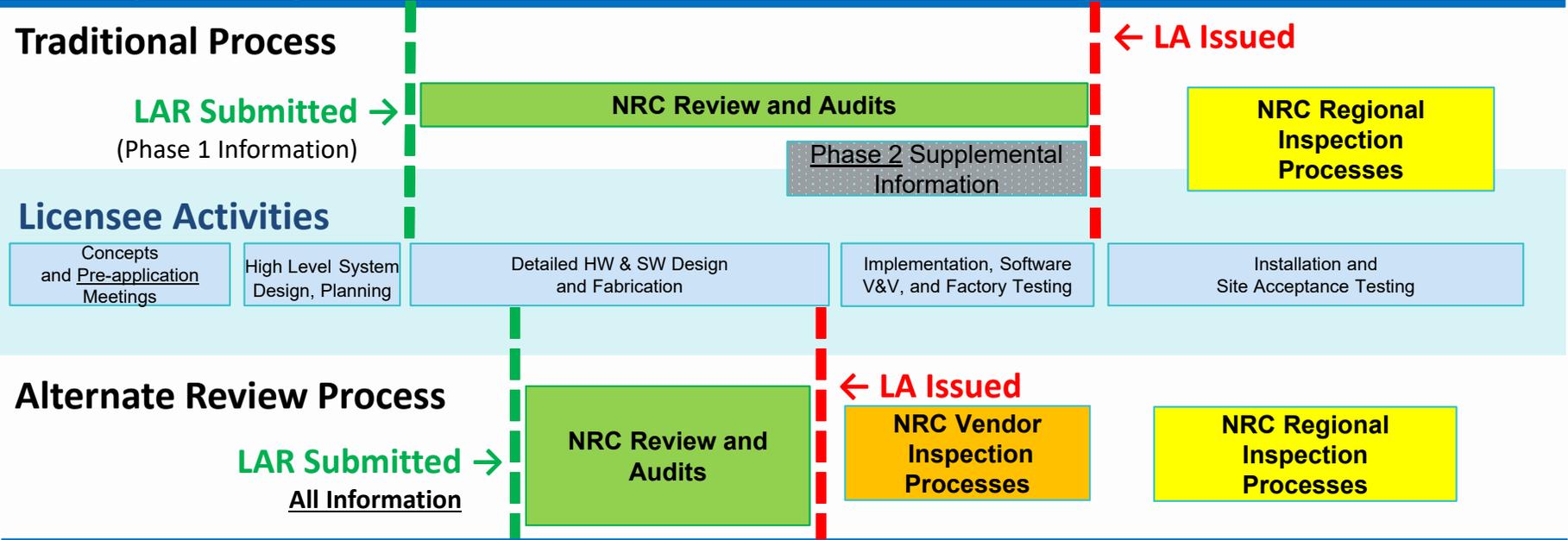
ERR migration issues occurred for one project causing hiccoughs in the NRC review process. These were quickly resolved by the vendor.



NRC Vendor QA Branch Inspections

- Industry conceptualized the following model when working with the NRC on ISG-06 ARP

Timeline (*not to scale*) →



NRC Vendor QA Branch Inspections

- Industry envisaged NRC Vendor QA Branch involvement following the LAR SER as depicted in the figure
- For one project the NRC Vendor QA Branch began its interaction with the licensee just after LAR acceptance to initiate planning for inspections.
 - NRC Vendor QA Branch inspections will be conducted concurrent with the LAR review
 - This process challenges project resources to complete the project and respond to two NRC branches concurrently.





Summary

- Industry appreciates continued NRC interactions to understand LAR review process
- Valuable lessons learned
- These learned lessons can assist future DI&C LAR planning and submittals
- Industry still values the ARP process to reduce licensing risk for project
 - Fewer NRC submittals
 - SER based on planning, system requirements, and architecture