



Very Low Safety Significance Issue Resolution (VLSSIR) Initiative

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Original Paradigm for Addressing Issues

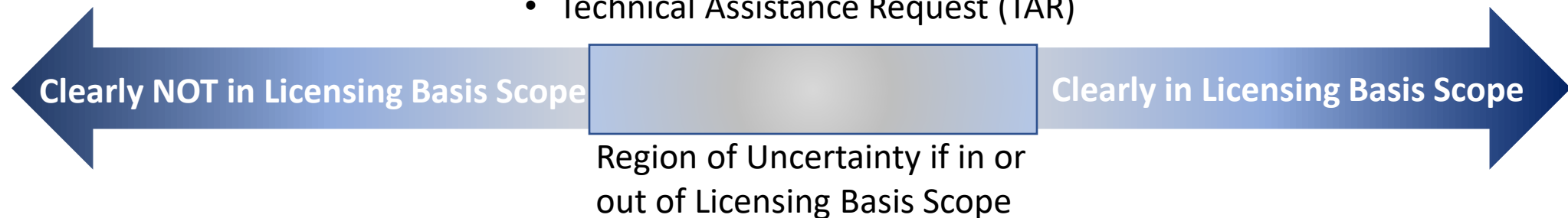
Evaluate issue to determine regulatory actions:

- Generic Issue Screening
- Order
- Backfit (72.62)

Address issue with appropriate regulatory tools:

- Enforcement
- Order
- Consider Prompt Corrective Action
- Corrective Action
- Enforcement Discretion
- Change Licensing Basis (72.7 Exemption, 72.56 Amendment, etc.)
- Change Requirement (Rulemaking)

- Technical Assistance Request (TAR)



May involve significant resources to decide issue status via TAR process

Very Low Safety Significant Issue Resolution (VLSSIR) Initiative

Purpose Statement



Situations in which an inspector/reviewer is not sure an issue is required to be addressed in the licensing basis

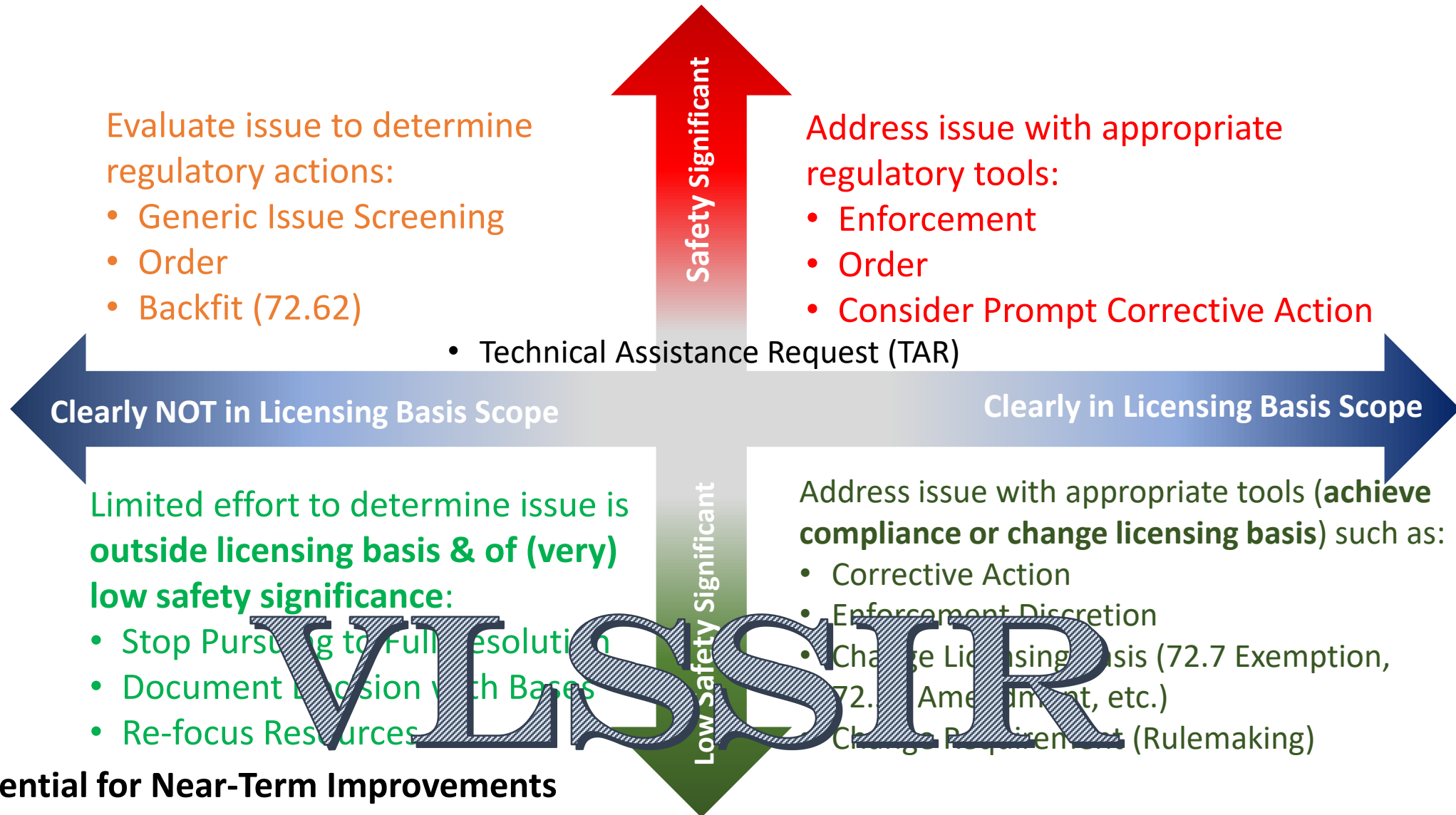


In the past, significant effort (resources and time) has been expended to determine if an issue is in/out of licensing basis before considering its significance



Put in place internal process enhancements to consider significance of an issue for situations where it is not clear if an issue is within the licensing basis scope

Revised Concept for Addressing Issues



VLSSIR –

Background

**Building off
similar initiative
in NRR**



Working team formed within NMSS to share insights in implementing a consistent approach across business lines



Includes representatives from each business line, regions, and general counsel.



Augmented with staff involved with a specific topic under consideration (e.g., Addressing Tornado Hazard during ISFSI STOs).

VLSSIR –

Within Inspection Arena

Document Rationale for
NOT Pursuing to Full
Resolution

LOWER LEFT QUADRANT



VLSSIR outcomes are different
than inspection findings

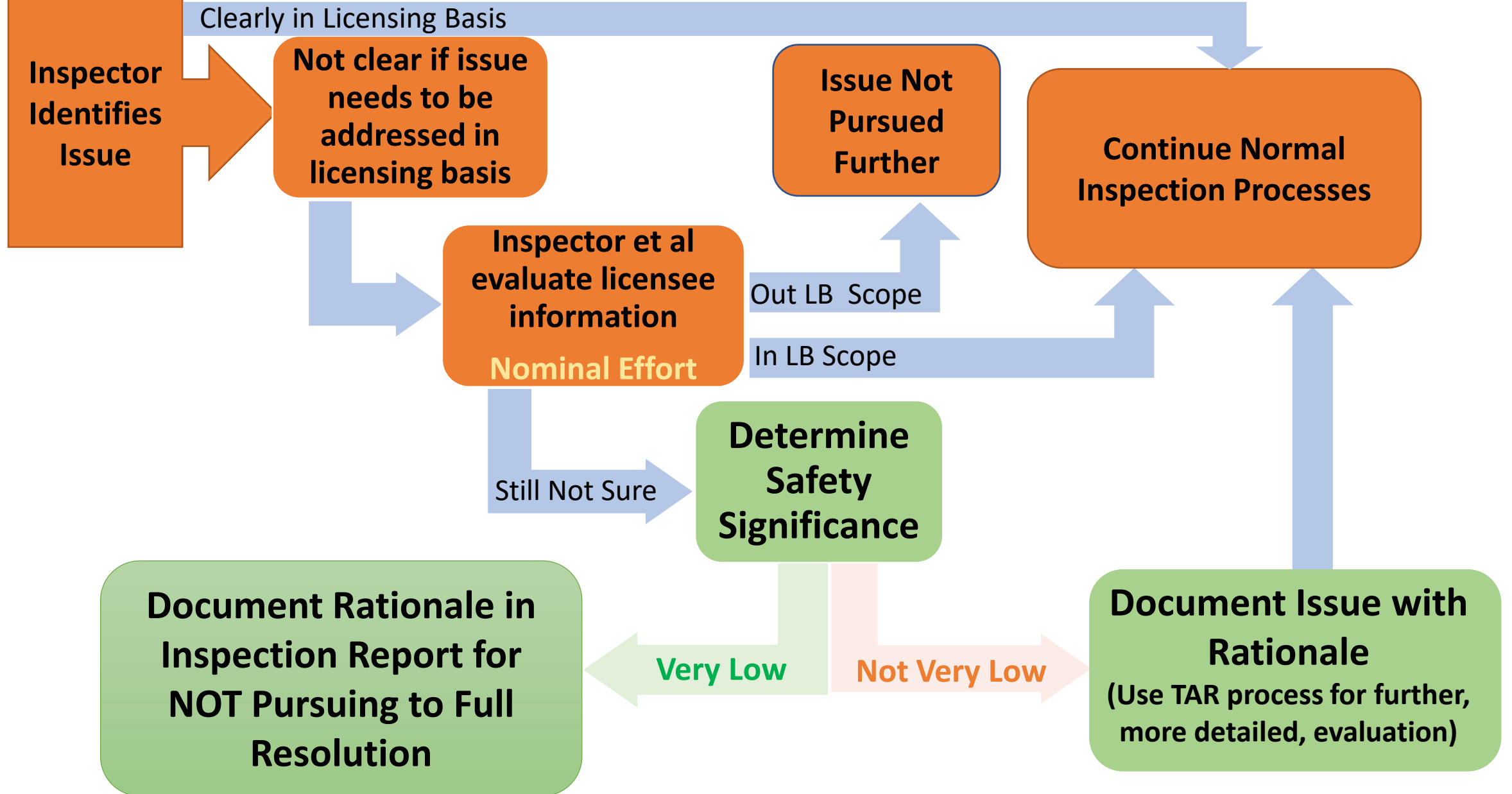


Issue is not formally resolved, but
provides the information/rationale for
not pursuing issue further and no
additional significant effort is spent
trying to fully close issue



**If information arises that
indicates the issue is within
licensing basis or is not of VLSS
then the issue can be revisited**

CONCEPT OF INSPECTION PROCESS ON LICENSING BASIS QUESTIONS



VLSSIR –

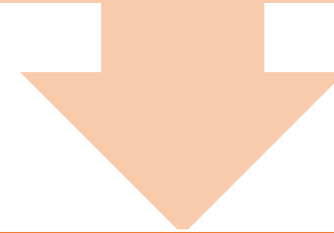
Interface with TAR Process

Means by which many
Licensing Basis
Questions are
Addressed

Procedure
under
revision
(still draft)

Interfaces
with VLSSIR
approach

Need to gain
experience in
use



Additional revisions to draft TAR
procedure will be implemented as
tabletop exercises of example issues are
conducted and/or as lessons learned

VLSSIR –

Issues Within Licensing Basis Arena

LOWER RIGHT QUADRANT



The VLSSIR concept can also apply to issues within the licensing basis, but it is implemented differently

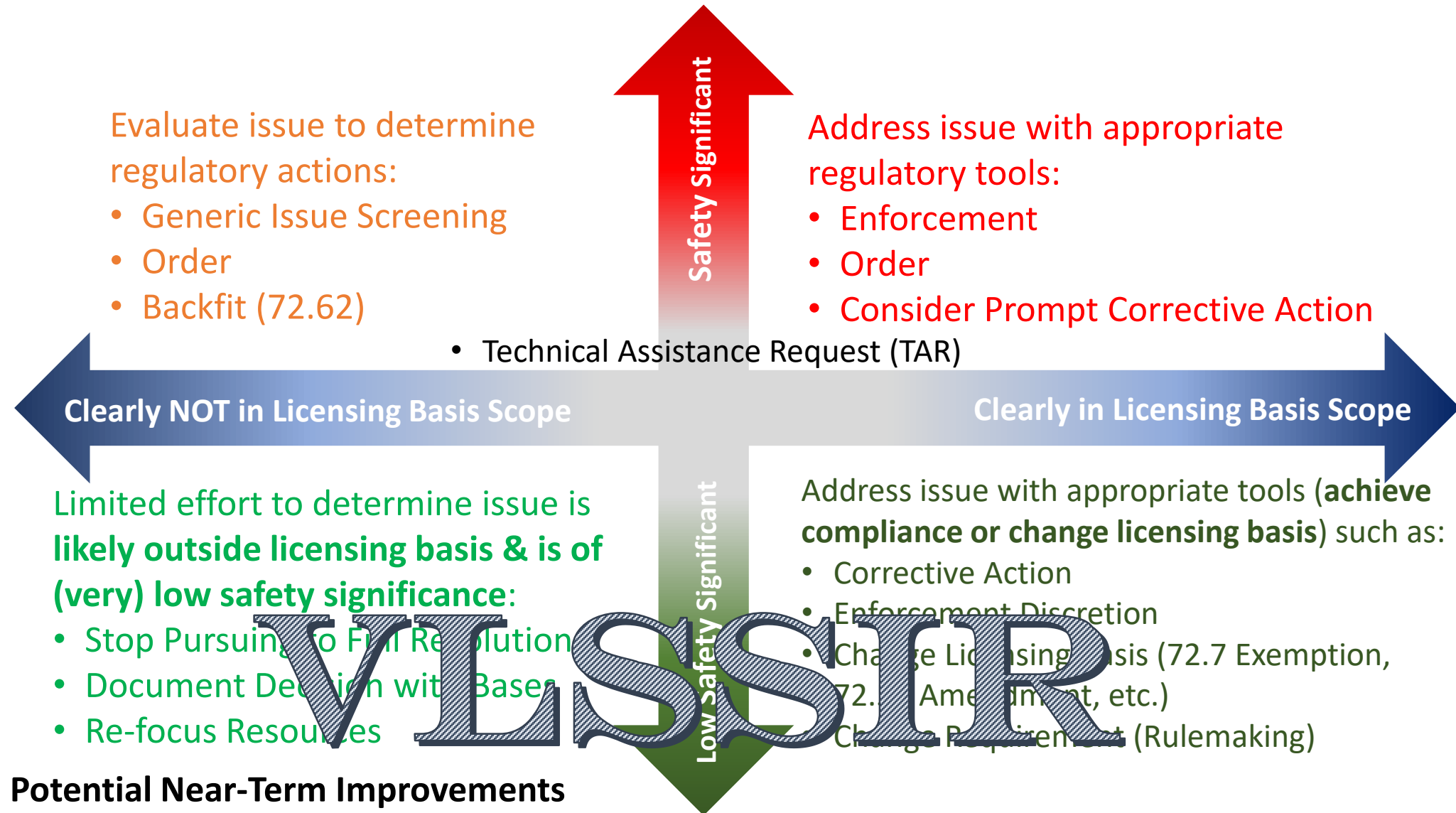


The VLSSIR process considers significance in determining the appropriate option(s) to address issues within the licensing basis



Aspects of licensing review scope, focus, and level of detail also consider significance

Concept for Addressing Issues



VLSSIR –

Discussion &
Questions

