

PUBLIC MEETING WITH THE NUCLEAR ENERGY INSTITUTE REGULATORY ISSUES TASK FORCE

April 12, 2023

NUCLEAR
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REACTOR
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REGULATION
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We Make **SAFE** Use of Nuclear Technology **POSSIBLE**



AGENDA

TIME (EST)	TOPIC
9:15 a.m. – 9:25 a.m.	Introductions/Opening remarks
9:25 a.m. – 10:00 a.m.	Potential license amendment request process improvements and streamlining discussion
10:00 a.m. – 10:25 a.m.	Discussion on expectations for the pre-application meetings
10:25 a.m. – 10:45 a.m.	Update on risk-informed process for evaluations and risk assessment process for review of topical reports
10:45 a.m. – 11:00 a.m.	What is next for risk-informed licensing discussion
11:00 a.m. – 11:10 a.m.	Break
11:10 a.m. – 11:25 a.m.	Update on EMBARK activities
11:25 a.m. – 11:35 a.m.	Discussion on staffing, budgeting, and resources
11:35 a.m. – 11:45 a.m.	Early feedback for 2023 Regulatory Information Conference
11:45 a.m. – 11:55 a.m.	Opportunity for public comments
11:55 a.m. – 12:00 p.m.	Wrap up discussion/Closing remarks
12:00 p.m.	Adjourn



OPENING REMARKS

Mike King

Deputy Director for Reactor Safety Programs and Mission Support
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission

Brett Titus

Director, Licensing
Nuclear Energy Institute

NEI

Potential license amendment request process improvements and streamlining discussion





EXPECTATIONS FOR PRE-APPLICATION MEETINGS

BO PHAM
Division Director

DOUG BROADDUS
Sr. Project Manager

Division of Operating Reactor Licensing, NRR

KEY MESSAGES



COMMUNICATION

Pre-submittal interactions are beneficial to the NRC staff for understanding and planning



TIMING

Critical for applicants to receive and incorporate NRC staff’s feedback



FEEDBACK

Successful acceptance may be impacted by addressing NRC staff’s feedback



COORDINATION

Early transmittal of information supports effective meetings



10 CFR 2.390

The NRC is responsible for performing withholding determinations

LICENSING ACTIONS / AMENDMENTS

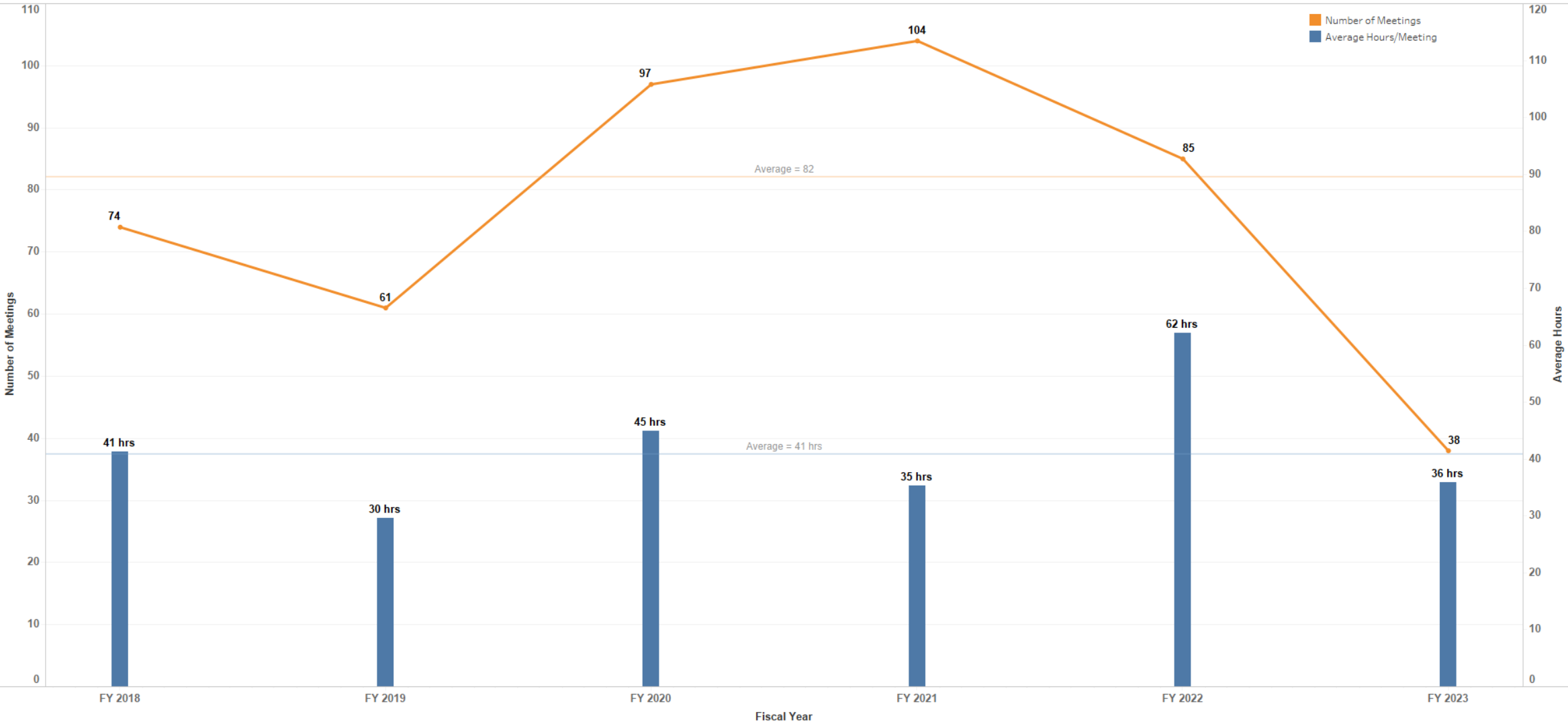
- Early, frequent communications avoid unnecessary delays in the processing of license amendment applications.
- Pre-application review meetings for future licensing actions are beneficial for complicated or first-of-a-kind applications.

TOPICAL REPORTS

- While pre-submittal meetings are not required, the NRC encourages the TR sponsor to initiate early engagement.
- For productive pre-submittal meeting, the TR sponsor should:
 - ✓ provide adequate technical detail concerning the approach, methods, and key assumptions
 - ✓ identify anticipated review challenges, significant changes from the existing state of practice, and information which requires additional attention during the review
- Pre-submittal meetings help facilitate discussions on planned submittal, the NRC staff's feedback, and expected submittal date, schedule, and review pathway.
- TRs sponsors are encouraged to provide to the U.S.NRC any supporting documentation and presentation materials at least 15 working days in advance of the scheduled meeting.

PRE-SUBMITTAL MEETINGS

FY 2018 - Present



PRE-SUBMITTAL MEETING TRENDS

- 10-15% of reviews involved a pre-submittal meeting
- Not all utilities/facilities request pre-submittal meetings to the same extent
 - Meeting requests for some facilities are 2-5 times higher than others
 - Highest average = 15/year
 - Lowest average < 1/year
- Difficult to correlate impact for resources and schedule for the NRC's review
 - Multiple factors can influence resources and schedule required to complete the review
 - Unique, first-of a kind and high complexity requests are not comparable to routine requests
 - A primary benefit is ensuring a complete application that can be accepted for review
 - Improved data will increase ability to assess impacts on licensing action reviews

REFERENCES

- 10 CFR 2.390, “Public inspections, exemptions, requests for withholding.”
- NRR Office Instruction LIC-101, Revision 6, “License Amendment Review Procedures” (ADAMS Accession No. ML19248C539).
- NRR Office Instruction LIC- 500, Revision 9, “Topical Report Process” (ADAMS Accession No. ML20247G279).
- NRR Office Instruction LIC-204, Revision 4, “Handling Requests to Withhold Proprietary Information from Public Disclosure” (ADAMS Accession No. ML20049A139).
- NRC Management Directive 3.4, “Release of Information to the Public” (ADAMS Accession No. ML080310417).
- NRC Management Directive 3.5, “Attendance at NRC Staff-Sponsored Meetings” (ADAMS Accession No. ML21180A271).

QUESTIONS / FEEDBACK



A blue-tinted photograph of a nuclear power plant. In the background, two tall, slender cooling towers stand against a clear sky. To their right, a large, cylindrical containment dome is visible, featuring a grid of small windows or vents near its top. The foreground is dominated by the fronds of palm trees, which are slightly out of focus, creating a sense of depth. The overall scene is a blend of industrial infrastructure and tropical environment.

UPDATE ON RISK INFORMED PROCESS FOR EVALUATIONS AND RISK ASSESSMENT PROCESS FOR REVIEW OF TOPICAL REPORTS

PURPOSE

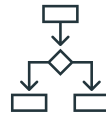
- Discuss planned guidance updates as result of the final observations from the review of first RIPE submittal
 - ✓ Updates to NRR Temporary Staff Guidance (TSG-DORL-2021-01) - Risk-Informed Process for Evaluations, Revision 2 (ADAMS Accession No. ML22088A136)
 - ✓ Updates to the Guidelines for Characterizing the Safety Impact of Issues, Revision 2 (ADAMS Accession No. ML22088A135)
- Discuss current TR guidance LIC-500, Revision 9, (ADAMS Accession No. ML20247G279) and proposal to the risk-informed TR reviews

INITIAL OBSERVATIONS OF FIRST RIPE SUBMITTAL

Observations were binned into three overarching topical areas:



TRAINING



PROCESS
IMPROVEMENTS



GUIDANCE UPDATES

UPDATES TO THE TEMPORARY STAFF GUIDANCE

- Provide additional information regarding defense in depth and safety margins review for very low safety significance issues.
- Provide clarifying information regarding the "no technical objections" review/schedule.
- Add information to support staff's review of performance monitoring.

UPDATES TO GUIDELINES FOR CHARACTERIZING THE SAFETY IMPACT OF ISSUES

1

Recommend that licensees request a pre-submittal meeting in preparation for a RIPE submittal

2

Recommend that licensees make the IDP documents available for staff review via a secure portal

3

Provide additional details as to what documentation should be submitted as part of a RIPE submittal

4

Include guidance for assessing performance monitoring strategies as a part of a RIPE submittal

RECENT ACCOMPLISHMENTS AND FUTURE WORK

- Expanded RIPE for Technical Specifications changes - issued June 2022 (ADAMS Package Accession No. ML22088A140).
- Will implement initial observations and best practices into TSG and guidelines for safety impact characterization based on recommendations from first RIPE review; and will issue both updated documents summer 2023.
- The staff is open to public and industry feedback on enhancing the process.

RISK INFORMING TOPICAL REPORT REVIEWS

- Current TR Process is described in LIC-500, Revision 9, "Topical Report Process," January 2022 (ADAMS Accession No. ML20247G279).
- Sponsor can propose one of four review pathways:
 1. Standard – Highly complex new or revised TR - 2 years
 2. Compressed – Less complicated TR, minimal RAIs - 1 year
 3. Uncomplicated – Minor revision TR, no RAIs - 6-12 months
 4. SE Confirmation – Revision which doesn't revise existing SE (vendor change) - 3-6 months

RISK INFORMING TOPICAL REPORT REVIEWS (CONT.)

- On February 16, 2023, the PWROG submitted via letter PWROG-22010-NP “Risk Assessment Process for Review of Topical Reports (RAPTR)” (ADAMS Accession Nos. ML23047A200 and ML23047A202).
- The purpose of the PWROG's submittal is to provide potential guidance to generically determine the safety significance of future topical reports and to assign appropriate resources commensurate with that significance.
- A fee waiver was submitted and is currently under review by OCFO.

RISK INFORMING TOPICAL REPORT REVIEWS (CONT.)

- An NRC Working Group has been established to determine viability of RAPTR.
- One option that is being considered by the Working Group is the potential to leverage and/or enhance the recently updated LIC-500 with risk insights.
- Working Group recommendations with alignment from management will determine path forward and any future interactions with the public and the PWROG.

POTENTIAL BENEFITS OF RIPE AND RISK-INFORMING TOPICAL REPORT REVIEWS



Focus NRC and licensee resources on the most safety significant issues



Address low safety significance issues in an efficient and predictable manner consistent with NRC's Principles of Good Regulation



Leverage existing regulations and risk insights

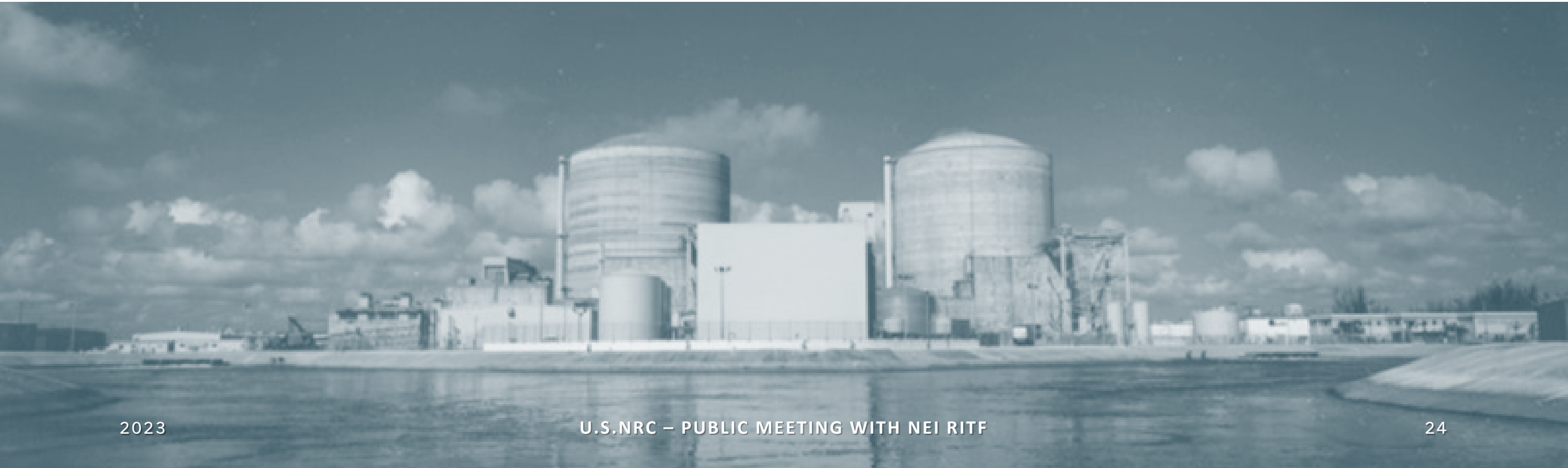


Incentivize the further development and use of probabilistic risk assessment models and applications

QUESTIONS / FEEDBACK



WHAT IS NEXT FOR RISK-INFORMED LICENSING DISCUSSION





EMBARK

VENTURE STUDIO

UPDATE

KATIE McCURRY

Director

EMBARK Venture Studio, NRR



WHAT IS EMBARK?

Agency's catalyst for
innovation activities

Two departments: Data
Exploration & Process
Improvement

Home to MAP and MAP-X,
the NRC's internal and
external mission analytics
portals

Strong partnership with
other NRC offices and
external stakeholders



- 60+ dashboards with 200+ individual views for 11 different NRC offices
- O&M phase for current dashboards, expanding data scientist and analyst skillsets across the NRC
- Improved the agency's accuracy, organization, analysis, and standardization of data
 - EOC Dashboard
 - Technical Support Branch Dashboard
 - Workload Planning



- MAP-X Vision
- NEI & Licensee Focus Groups
- Available Modules:
 - Event Notices (Form 361)
 - Relief Requests
- Next to be deployed:
 - General Submissions
 - Licensee Event Reports (Form 366)
- Next to be developed:
 - Fitness For Duty
 - Operator Licensing
 - Radioactive Shipment Notifications

PROCESS IMPROVEMENT INITIATIVES



GENERIC ISSUES PROGRAM

Enhancements to improve the efficiency and timeliness of the Generic Issues Program



INITIAL & SUBSEQUENT LICENSE RENEWAL APPLICATIONS

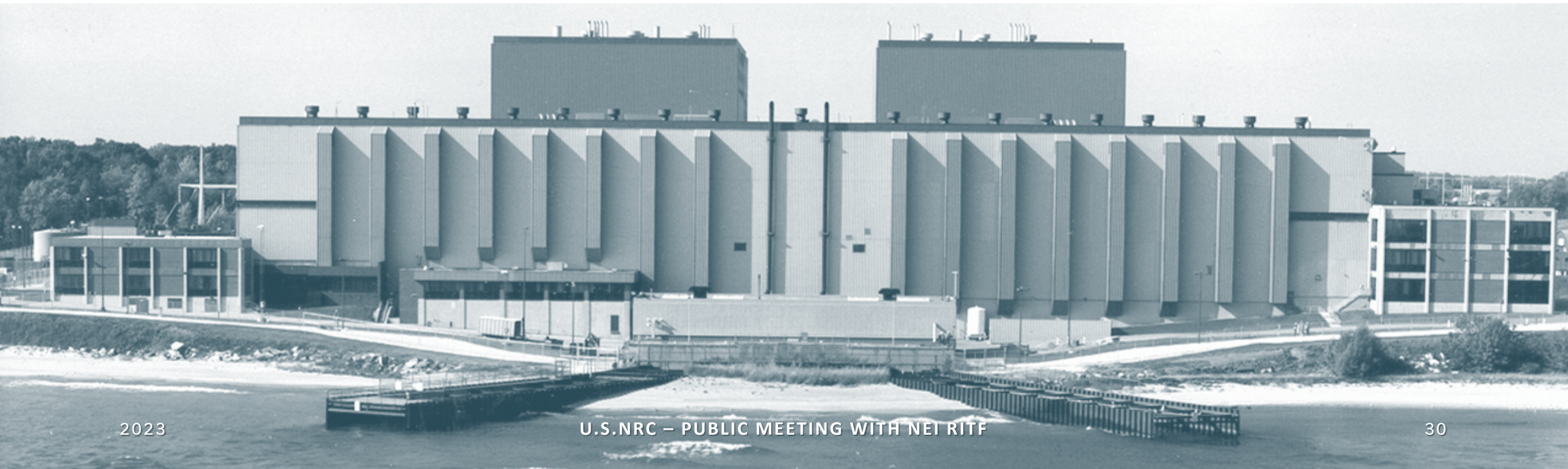
Tool to standardize and streamline how the NRC makes work assignments and tracks data, trends, and milestones

QUESTIONS / FEEDBACK



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DISCUSSION ON STAFFING, BUDGETING, AND RESOURCES



EARLY FEEDBACK FOR 2023 REGULATORY INFORMATION CONFERENCE

Holly Cruz, RIC Co-Champion

Division of Advanced Reactors and Non-power Production and
Utilization Facilities

Office of Nuclear Reactor Regulation

Luis Betancourt, RIC Co-Champion

Division of Systems Analysis

Office of Nuclear Regulatory Research





- In keeping with the theme, “Navigating the Nuclear Future,” the 2023 hybrid RIC delivered a program that met our goal of providing all attendees with important and relevant information specific to the NRC’s safety and security mission both now and in the future.
- It was the first hybrid RIC for the NRC and we appreciate NEI supporting the RIC with panelists on three technical sessions!
- The 2023 hybrid RIC had nearly 4,000 registrations from over 55 countries, remaining consistent with registrations from the prior two virtual RICs, even after transitioning to hybrid this year.
- Plenary session recordings are available for viewing at <https://video.nrc.gov/>.

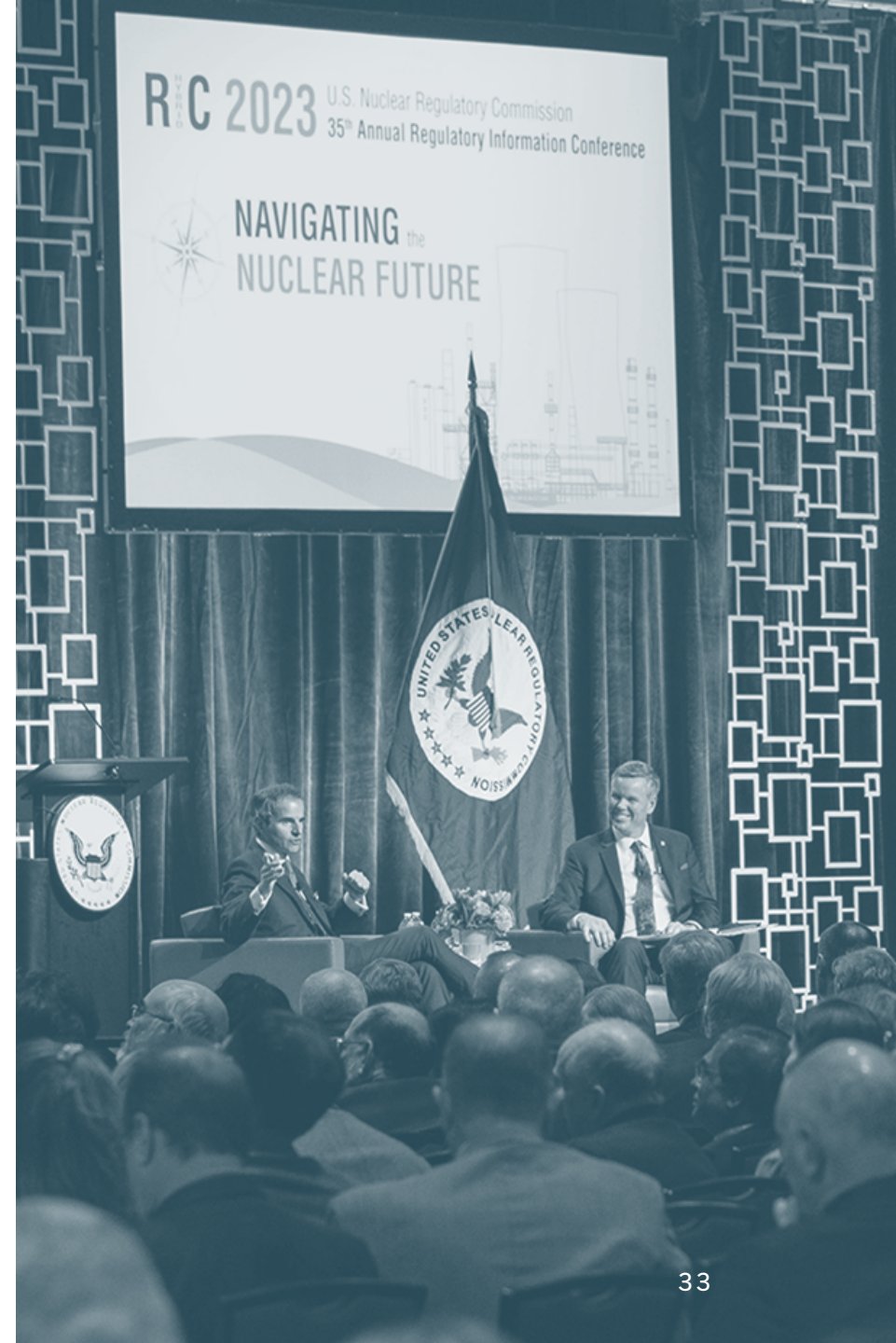
LOOKING FORWARD TO THE 2024 RIC:

The 36th RIC is scheduled for
March 12-14, 2024

We encourage feedback from stakeholders throughout the RIC planning timeline, with staff submissions finalized by the end of September 2023.

We welcome input from the public, NEI, and other stakeholders to inform next year's topics. Please include this input in the [RIC survey](#) and engage with organizational counterparts on specific topics, as appropriate.

Please use the [Contact Us](#) form on the RIC public website if you have any questions or want to share feedback with the NRC.



QUESTIONS / FEEDBACK



OPPORTUNITY FOR PUBLIC COMMENTS



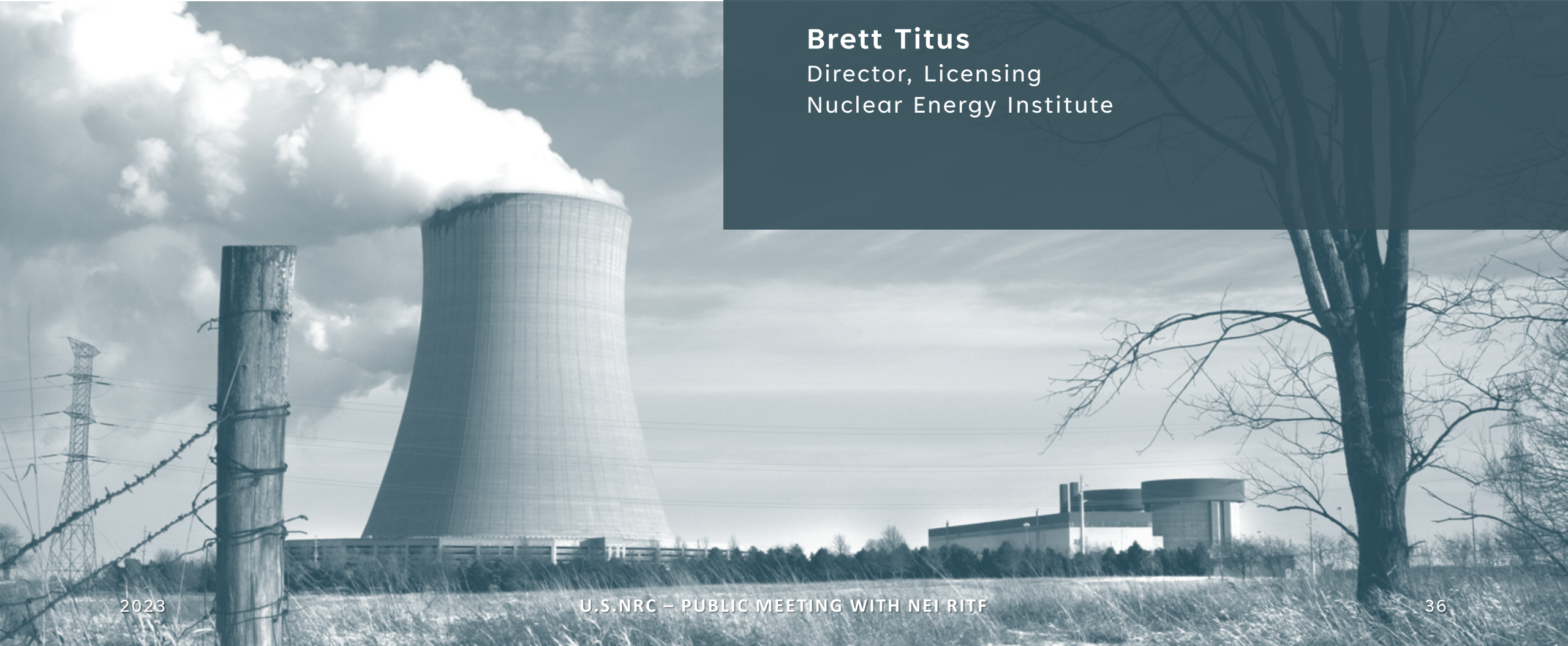
CLOSING REMARKS

Mike King

Deputy Director for Reactor Safety Programs and
Mission Support
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission

Brett Titus

Director, Licensing
Nuclear Energy Institute



ACRONYMS

ADAMS	Agencywide Documents Access and Management System
EOC	End of Cycle
EST	Eastern Standard Time
IDP	Integrated Decision-making Panel
NEI	Nuclear Energy Institute
U.S.NRC	U.S. Nuclear Regulatory Commission
NRR	Office of Nuclear Reactor Regulation
OCFO	Office of the Chief financial Officer
O&M	Operations and Maintenance
PWROG	Pressurized Water Reactor Owners Group
RAPTR	Risk Assessment Process for Review of Topical Reports
RIC	Regulatory Information Conference
RIPE	Risk-informed Process for Evaluations
TRs	Topical Reports
TSG	Temporary Staff Guidance

