

PUBLIC MEETING WITH
THE NUCLEAR ENERGY INSTITUTE (NEI)
REGULATORY ISSUES TASK FORCE

November 28, 2023



We Make **SAFE** Use of Nuclear Technology **POSSIBLE**



AGENDA

Time	Topic	Speaker
1:00 pm	Introductions/Opening Remarks	Bo Pham (NRC, Director, Division of Operating Reactor Licensing) Brett Titus (NEI, Director of Licensing)
1:10 pm	Power Uprates	William Orders (Division of Operating Reactor Licensing)
1:25 pm	Innovation/EMBARK Venture Studios • Mission Analytics Portal (External) Update	Laura Smith (EMBARK) Melissa Walker (EMBARK)
1:50 pm	Differing Views Program	Gladys Figueroa-Toledo (Office of Enforcement)
2:10 pm	Enhanced Weapons Rule	Bo Pham (NRC)
2:30 pm	Break	
2:45 pm	Generic Communications	Lisa Regner (Division of Reactor Oversight)
3:00 pm	Process for Ongoing Assessment of Natural Hazard Information • Seismic • Program Update (Other Natural Hazards)	Ed Miller (Division of Operating Reactor Licensing) Kevin Quinlan (Division of Engineering and External Hazards)
3:10 pm	Regulatory Guide 1.183 Rev 1 Update	Kevin Hsueh (Division of Risk Assessment)
3:15 pm	Risk Informed Process for Evaluations	Michele Kichline (Division of Risk Assessment)
3:25 pm	Open Discussion – Standing Topics • RIC 2024 • Forthcoming Process Changes • Staffing, Budgeting, and Resources • Reports on Timeliness Metrics, RAIs • Trends/ Patterns/ Best Practices • Knowledge Management	Bo Pham (NRC), Brett Titus (NEI) Jorge Hernandez-Munoz, Jonathan Evans, RIC Co-Champions
4:15 pm	Opportunity for Public Comments	
4:25 pm	Closing Remarks	NRC
4:30 pm	Adjourn	

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OPENING REMARKS

November 28, 2023

Bo Pham

Director, Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission

Brett Titus

Director, Licensing
Nuclear Energy Institute

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Readiness to License Power Uprates

William Orders

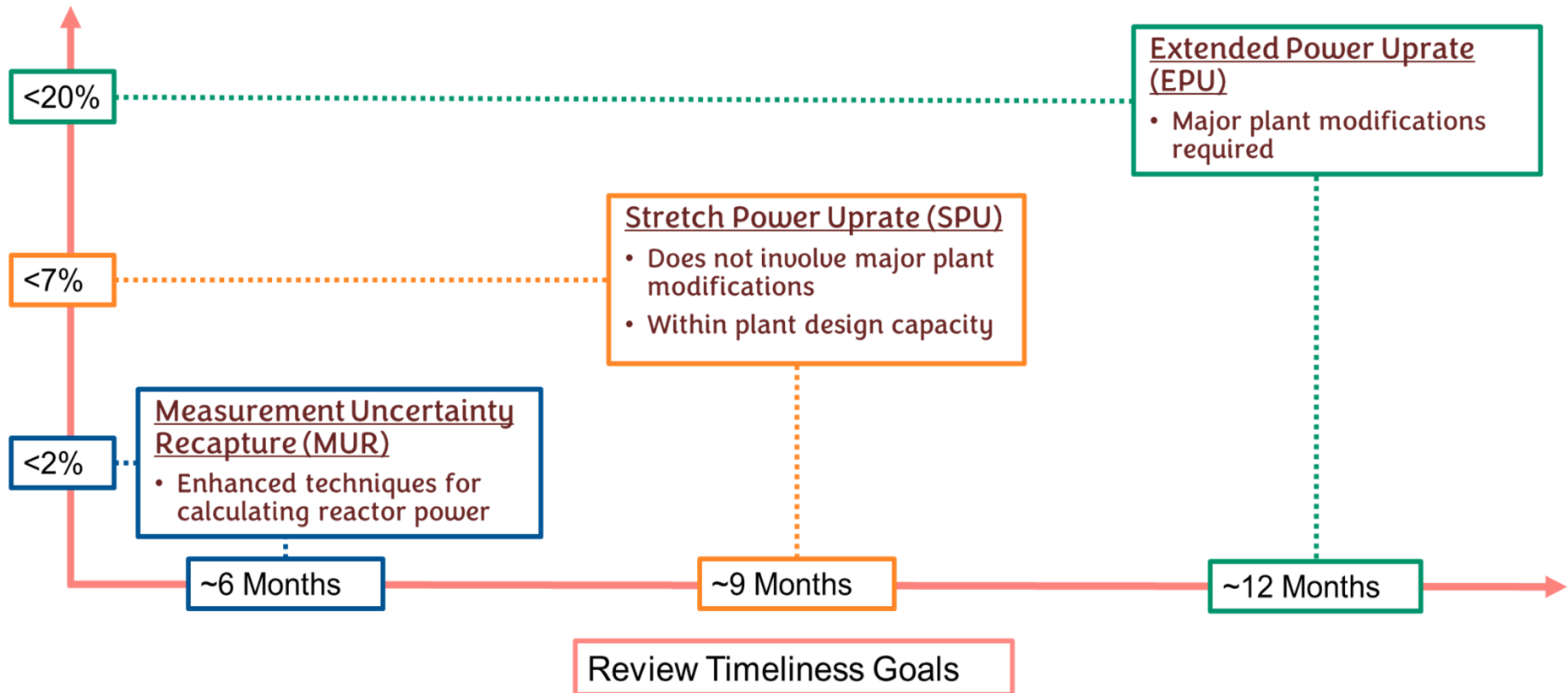
Senior Project Manager, NRR/DORL

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TYPES OF POWER UPRATES



ACTIVELY MONITORING THE LANDSCAPE

- Inflation Reduction Act of 2022, tax credits supporting continued operations with power uprates and Accident Tolerant Fuel (ATF).
- >50% of sites are planning for one or more power uprates with a combined capacity equivalent to 2 large Light Water Reactors (LWRs).

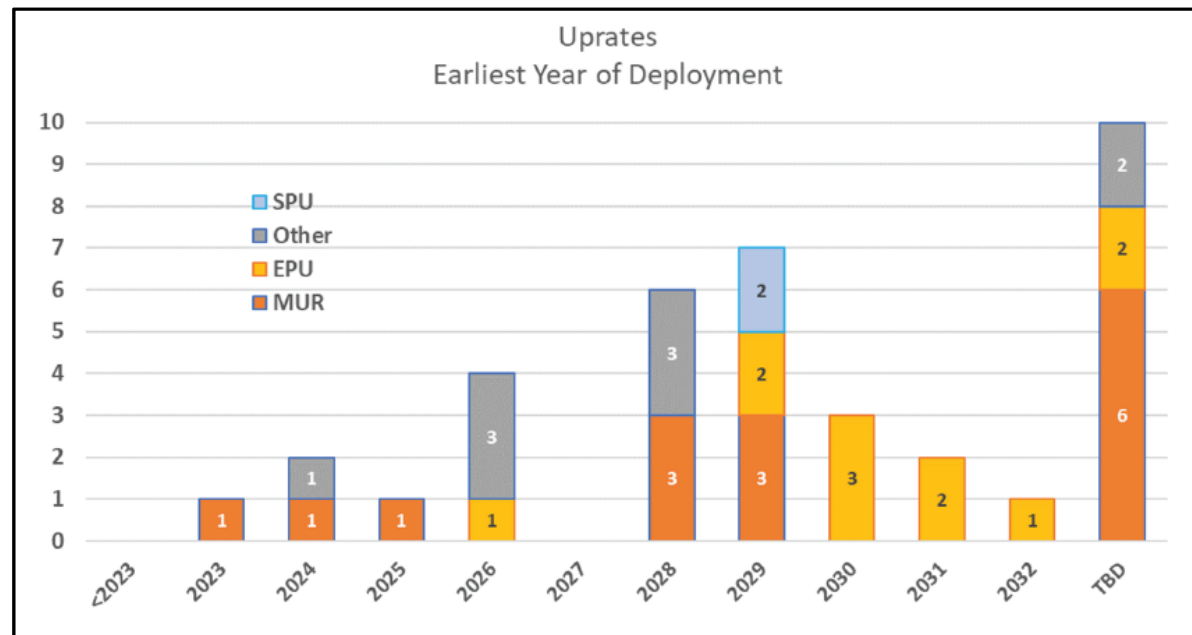
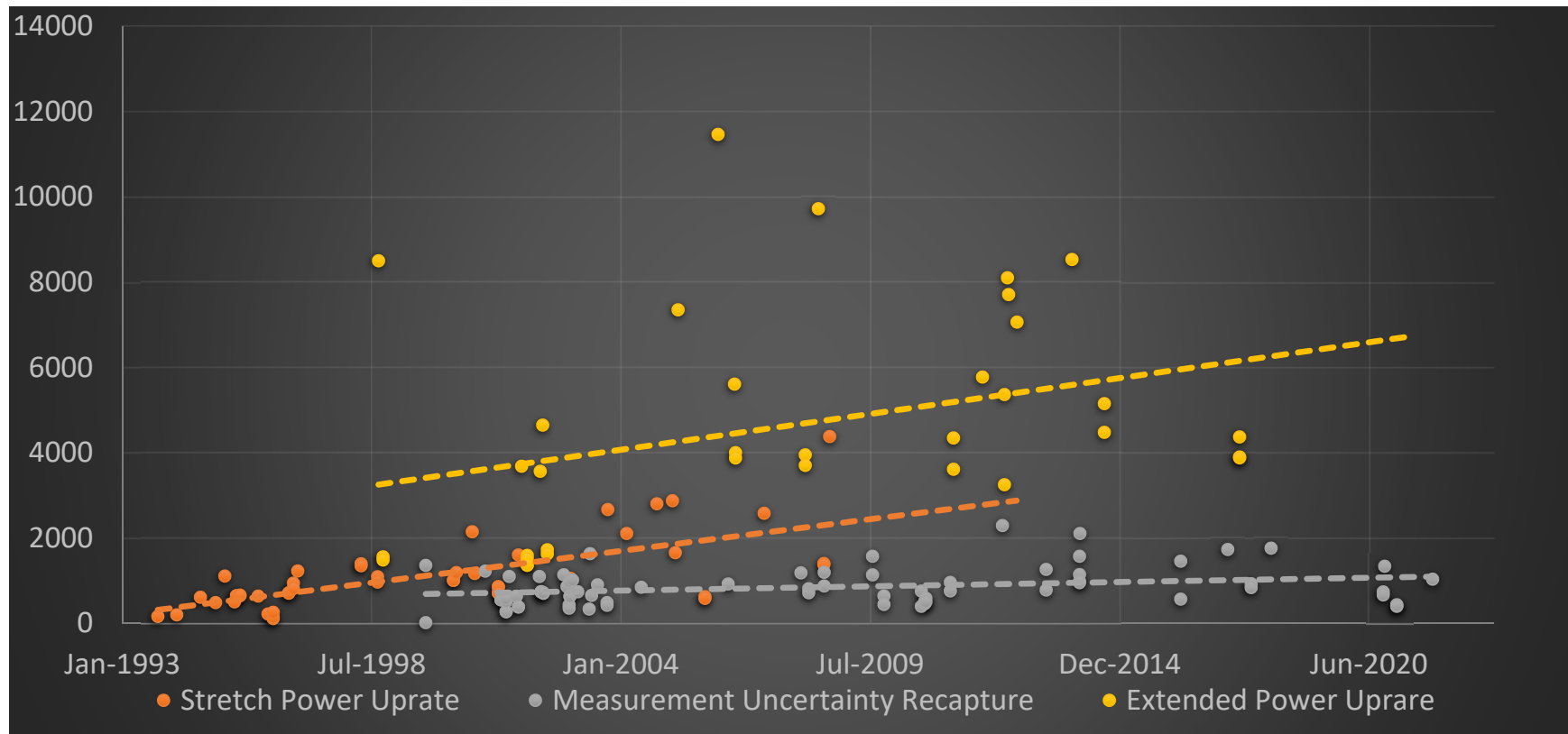


Photo Credit: Nuclear Energy Institute (NEI) The Future of Nuclear Power 2023 Baseline Survey
Note: Unspecified Power Uprates in the 1% to 3% range are identified as "Other" on this graphic.

USING POWER UPRATE HISTORICAL DATA TO OPTIMIZE OUR FUTURE PROCESSES

Level of Effort for Power Upgrades



NEXT STEPS

- Develop Power Uprate Team Charter
 - Organize the power uprate review team to gain efficiencies
- Develop Power Uprate Regulatory Issue Summary
 - Request additional information on potential power uprate submittals
- Prepare for 2024 RIC Session
 - Joint Power Uprate and ATF session
- Revise LIC-112, power uprate process
 - Use NRC lessons learned and industry feedback to streamline/update the staff guidance

MAP-X Update

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Laura Smith

Product Owner, NRR/EMBARK

Melissa Walker

Director, NRR/EMBARK

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EMBARK

Change organization housed within the Office of Nuclear Reactor Regulation (NRR)

Facilitating innovation and data improvements across the agency

Strong partnership with program data owners and users and the Office of the Chief Information Officer (OCIO)

MAP-X

A user-authenticated web portal that improves the way that the agency can exchange data and information with licensees and approved stakeholders.



MAP-X STATUS

- Active MAP-X Modules

- Web-Based Relief Requests
- Event Notification (Form 361)
- Licensee Event Reports (Form 366) (late November)
- General Submission (Similar to the EIE General Form) (late November)

- Proposed MAP-X Modules

- Fitness for Duty
- Operator Licensing



The MAP-X Portal

The NRC's Mission Analytics Portal-External, or MAP-X, is a tool designed to modernize and enhance communications with licensees while maintaining openness with the public. The NRC is using state-of-the-art development tools and expects additional MAP-X features will further enhance the agency's online capabilities.

Licensees can use MAP-X to create verified profiles for editing, submitting, and checking the status of requests and reports made through the portal. Additionally, users will be able to see previously submitted requests and reports via the portal.

Licensees have the option of using the MAP-X portal, or they can use established submission methods.

MAP-X BENEFITS

External Users

- Individual access from anywhere - not tied to a specific computer/physical location
- Due to user credentialling and authentication, portal access and submission viewing is secure – can share sensitive or curated information
- Email record/proof of submission
- Form field validation / auto-populated fields
- View previous submissions

NRC

- Receives information as structured data rather than narrative text or attachments (as applicable)
- Can support streamlining and monitoring incoming data processes
- Routing and availability of information within the NRC is enhanced

BUILDING A SMARTER WEB FORM

- Drop down lists
- Required fields
- Validation of data field formatting (dates, phone numbers)
- Conditional input fields
- Auto population of fields based on user information
- Ability to expand/minimize parts of forms

*Name of Caller/Title

*Call Back Number

(123) 456-7890

*Event Time and Zone

17:00 EST

*Event Date

MM/YYYY

*Location of Event (include county and state)

Portion of Plant Affected (if applicable)

*Event Classification

Select Event Classification

*Event Type

Select Event Type

Event Description (Include: Systems affected, actuations and their initiating signals, causes, effect of event on plant, actions taken or planned, etc.)

*Event Description

RECENT MAP-X PROGRESS

- Licensee Event Report Availability
- General Submission Modules Availability
- Optimization of MAP-X Portal performance
- Establishment of NRC-Licensee focus groups



PROPOSED MAP-X UPGRADES

- Continued MAP-X User Experience Improvements
 - Status updates of submitted requests
 - Interfaces with Requests for Additional Information (RAIs)
- More reporting/interactive functionality within the application for NRC users
- Continue to explore possible future MAP-X modules

ADVICE FOR MAP-X USERS

- If you may have a near-term use for MAP-X, sign up for a user account today!
- MAP-X User Guide and FAQ Rev. 3 available at <https://www.nrc.gov/docs/ML2229/ML22290A105.html>
- Be prepared to go through ICAM Level Gold credentialling to use MAP-X
 - Requires both a recent photo and a photo ID (State Driver's License is acceptable)
 - <https://pki.nrc.gov/ecs/apps/gold/dcc-gold-wrr.html> to apply for credentialling
- Informing your NRC project manager that you want to use MAP-X will help ensure the process goes smoothly; you can also contact MAP-X.resource@nrc.gov with any issues or questions
- Once you are credentialled, login to the portal <https://mapx.nrc-gateway.gov/> to become familiar with the application, your roles/permissions, and the forms
- We also have a test environment for credentialled users, if you want to explore and test out the system <https://mapx-preprod.powerappsportals.us/>

NRC Differing Views Program

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Gladys Figueroa-Toledo

Senior Differing Views Program Manager, OE

Nadim Khan

Differing Views Program Manager, OE

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NRC POLICY ON DIFFERING VIEWS

*All NRC employees and contractors are encouraged to raise concerns and differing views **promptly without fear of reprisal**. A respectful environment that promotes the free and open exchange of ideas is the ideal forum for raising and addressing concerns and differing views in an efficient and timely manner. Raising and addressing differing **views improves decision-making processes** and **supports the agency's mission**.*

ROLES AND RESPONSIBILITIES

- Employees have a responsibility to raise concerns and propose solutions as early as possible in the decision-making process.
- Management has the responsibility to listen and consider differing views, and critically assess the merits of each position to make the most informed and sound decision.
 - Management retains final decision-making authority and accountability.
- *Behaviors bring policies and processes to life.*
 - Everyone's attitudes and behaviors shape the NRC safety culture and our ability to fulfill our mission.

WAYS TO RAISE DIFFERING VIEWS

The NRC's dedication to safety is ingrained in our tiered approach for addressing safety concerns and differing views:

- *Informal Discussions,*
- *the Open Door Policy ([Management Directive \(MD\) 10.160](#)),*
- *the Non-Concurrence Process [NCP] ([MD 10.158](#)), and*
- *the Differing Professional Opinion [DPO] Program ([MD 10.159](#)).*

INFORMAL DISCUSSIONS

The routine, recommended process for resolving a differing view is through informal discussions with the immediate supervisor.

If informal discussions do not resolve concerns, the following formal avenues are available for employees to express and have their differing views heard and considered by management:

- The Open Door Policy
- The NCP
- The DPO Program

Informal discussions are necessary and a precondition for engaging in the NCP and DPO Program formal processes.

OPEN DOOR POLICY

The Open Door Policy promotes early discussion of differing views and provides a channel for communicating concerns or issues directly to all levels of responsible agency officials.

Allows an employee to discuss any work-related issue or concern with any agency supervisor or manager (including a Commissioner or the Chairman of the NRC) beyond informal discussions with their immediate supervisor.

The Open Door Policy is managed in the Office of the Chief Human Capital Officer (OCHCO) and is described in [MD 10.160](#), "Open Door Policy."

THE NCP

An NRC employee who has a role in creating or reviewing a document ***in the concurrence process*** is eligible to submit a non-concurrence as a means of formally communicating disagreement with the document.

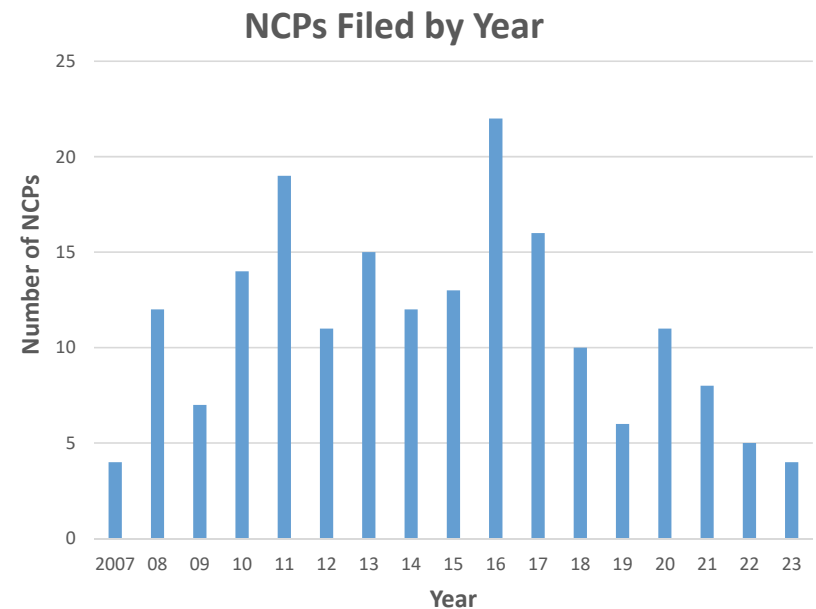
- *The NCP is a voluntary process.*
- *The NCP has eligibility requirements for both individuals and the subject document.*
 - *The individual with the different view must have a role in the review.*
 - *The subject document must be a draft and in the active concurrence process.*
- *The NCP follows the concurrence review schedule of the subject document.*
- *The NCP concerns are reviewed and dispositioned by management in the line organization with oversight over the subject document.*

Described in [MD 10.158](#), "NRC Non-Concurrence Process."

THE NCP

The primary purpose of the NCP is to provide a consistent approach to processing non-concurrences to ensure that a differing view is heard, understood, and considered to ***inform and support the decision-making process***.

Described in [MD 10.158](#), “NRC Non-Concurrence Process.”

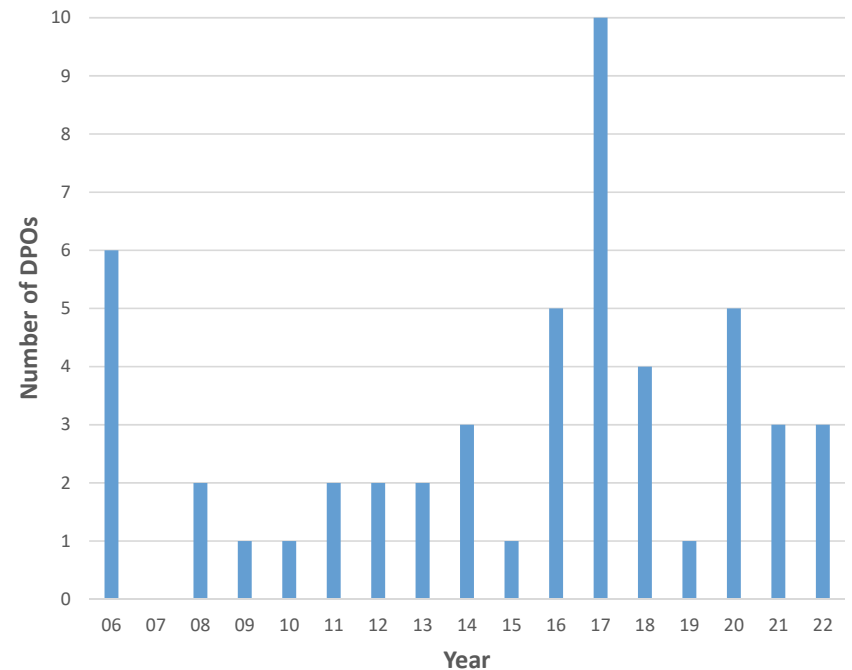


THE DPO PROGRAM

A DPO is a means of communicating a position that differs from an **established** agency position involving technical, legal, or policy issues provided it is related the agency's mission and to the strategic goals and objectives that support the mission as addressed in the [NRC's Strategic Plan](#).

Described in [MD 10.159](#), "NRC Differing Professional Opinion Program."

DPOs Filed by Year



THE DPO PROGRAM

- The DPO Program is a voluntary process.
- The DPO Program applies to final documents where an agency's position has been established.
- The DPO Program does not apply for issues that already have been considered, addressed, unless significant new information is available.
- Timeliness goals and scope of review is established after a kick-off meeting that includes the submitter and decision-maker and is based on safety significance of the issue, complexity of the issue, and priority of other work activities.
- The DPO Program features an optional DPO Tiger Team.
- The DPO program features a review by an independent panel of NRC subject matter expert(s).
- The DPO concerns are dispositioned by an Office Director or Regional Administrator.
- The DPO program features an **appeal** that allows an NRC employee to have their concerns considered and responded to by the Executive Director for Operations (EDO), or the Chairman or the Commission for those offices reporting to the Chairman or the Commission.

Described in [MD 10.159](#), "NRC Differing Professional Opinion Program."

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DIFFERING VIEWS PROGRAM IMPROVEMENTS

- A Differing Views Program Improvement (DVPI) Project was completed in 2018 (ADAMS Accession No. [ML19133A284](#), public version).
- The DVPI Project provided agency senior leadership with recommendations to improve the effectiveness and efficiency of the NRC's NCP and DPO Program.

DIFFERING VIEWS PROGRAM IMPROVEMENTS

- **The Rapid Resolution Stage:** The rapid resolution stage proactively creates opportunities for earlier understanding of the involved parties' interests and for the effective and efficient informal resolution of differing views before entering the resource intensive NCP and DPO Program.
- **A DPO kick-off meeting:** The enhanced DPO kick-off meeting that includes the submitter, DPO decision-maker, DPO panel members, and any others who have already been identified as being needed. This kick-off meeting gives the submitter an opportunity to share their concerns directly to a DPO decision-maker and includes a discussion on roles and responsibilities, other expectations, appropriate process flexibilities, a plan to resolve and disposition the issue, milestones, target dates, available resources, among others.
- **DPO Decision Delegation to Deputies Office Directors/Regional Administrators:** Allows ODs and RAs to delegate the disposition of DPO cases to their deputies.
- **Senior Level Advisors serving as chairperson in DPO panels:** Only Senior Executive Service (SES) members were permitted to serve as DPO panel chairs to lead the independent review of the safety concerns raised in a DPO and provide recommendations to a DPO decision-maker. The recent change also allows Senior Level Advisors to chair a DPO panel.

Although not inclusive, additional program improvements are described in the DVPI Project report (ADAMS Accession No. [ML19133A284](#), public version)

DIFFERING VIEWS PROGRAM IMPROVEMENTS

- **The DPO Tiger Team:** The DPO Tiger Team establishes a list of subject matter experts that can be called upon to conduct an evaluation of the issues, scope, and any other important circumstances that can help to quickly understand and assess the issues raised in a DPO submittal to the extent that it can assist in resolving concerns and recommend potential DPO Program process flexibilities, so that the agency can prioritize its activities and apply the appropriate resources.
- **Upfront Clarity:** The DPO form now reflects the submitter's opinion and justification of each of the following:
 - *(1) importance of prompt action on the issue,*
 - *(2) safety significance of the issue, and*
 - *(3) complexity of the issue to inform the review plan.* In addition, the submitter should also include a list of the area(s) of technical expertise they feel is necessary to properly assess the issue.
- **Immediate safety concerns in the DPO forms:** Guidance to assist decision-makers assigned a DPO where the submitter believes the issue represents an immediate public health and safety concern was developed. Note that the guidance describes one way to perform and document an assessment of the safety and security significance of a concern, the decision-maker has the authority to decide on the scope and methodology for addressing assertions of immediate safety concerns.

THE DIFFERING VIEWS PROGRAM

- The NCP and DPO Program has evolved and will continue to evolve.
- As a forward-thinking organization committed to continuous learning, we continue to seek opportunities to improve and integrate safety considerations into the prioritization for resolving safety concerns.
- We are dedicated to striking a balanced differing views program that -
 - supports enhanced decision-making,
 - ensures safety concerns are effectively and efficiently resolved,
 - fosters a culture of respect and openness, and
 - provides reasonable assurance of the protection for the public health, safety, and the environment.

The NCP vs The DPO Program	NCP	DPO Program
Used for the Resolution of Safety and Security Concerns	X	X
Features a Rapid Resolution Stage facilitated by the Differing Views Program Managers	X	X
Informal Discussions are a Precondition	X	X
Does Not Apply to Documents that Address Personnel Actions, Issues that are Subject to Collective Bargaining, and Issues Involving Allegations	X	X
Has Eligibility Requirements for Submitters	X	
Subject Document Must Be in Draft Form and in Active Concurrence	X	
Timeliness Goals Driven by the Timeliness Goal of the Subject Document	X	
Concerns are Dispositioned by Management in the Same Line Organization as the Subject Document (normally at the division level)	X	
For Issues on Final Documents where an Agency's Position Has Been Established		X
Does Not Apply for Issues that Already Have Been Considered, Addressed, Unless Significant New Information is Available		X
Features an Independent Review by NRC Experts		X
Concerns are dispositioned by an Office Director or Regional Administrator		X
Timeliness Goals and Scope of Review Established after a Kick-Off Meeting and Based on Safety Significance of the Issue, Complexity of the Issue, and Priority of Other Work Activities		X
Option to Use DPO Tiger Team		X
Submitter can Appeal to the Executive Director for Operations (EDO), or the Chairman or the Commission for Those Offices Reporting to the Chairman or the Commission		X

SUMMARY

- It is the NRC's policy to establish and maintain an environment where all NRC employees and contractors may raise concerns and differing views promptly without fear of reprisal.
- Raising and addressing differing views improves decision-making processes and supports the agency's safety and security mission.
- The NRC places safety as its utmost priority and has implemented a robust process to ensure diverse views are considered during the decision-making process.
- The NRC uses a tiered system for addressing differing views. This includes informal discussions, the Open Door Policy, the NCP, and the DPO Program.
- The existence of multiple channels helps create an open, collaborative work environment by reducing barriers to expressing differing views.
- The NRC's commitment to safety entails creating and maintaining a culture where staff are encouraged to raise safety concerns, which are assessed and resolved based on their safety significance. These processes allow decision-makers and employees to incorporate safety considerations into the prioritization for the resolution of safety concerns.
- As a forward-thinking organization committed to continuous learning, we continue to seek opportunities to improve and integrate safety considerations into the prioritization for resolving safety concerns.

RESOURCES



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NCPPM.Resource@nrc.gov

DPOPM.Resource@nrc.gov



Nadim Khan
MDKadim.Khan@nrc.gov



For questions about the Open Door Policy,
please contact:

OrganizationalCulture.Resource@nrc.gov

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Enhanced Weapons Rule

Bo Pham

Division Director, NRR/DORL

November 28, 2023

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BREAK
2:30 – 2:45

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Generic Communications

Lisa Regner

NRR/DRO

November 28, 2023

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EMERGENCY TELECOMMUNICATIONS SYSTEM DISCONNECT INFORMATION NOTICE

- NRC licensed facilities are at risk of losing emergency telecommunications with the NRC that rely on legacy, copper-based wire technology (alternate communication means are available)
- The NRC is required to establish and maintain “a mechanism for instantaneous and uninterrupted verbal communication” with licensees; licensees required to have this ability for EP
- Information Notice provides information on options provided by NRC to ensure continued emergency communications
- [ML23289A249](#)

NRC RESOURCE PLANNING REGULATORY ISSUE SUMMARIES (RIS)

- Power Uprate (proposed)
- Digital Instrumentation & Control (proposed)
- Accident Tolerant Fuel ([ML23123A166](#))
- Operator Licensing Exams ([ML23025A219](#))

OTHER REGULATORY ISSUE SUMMARIES

- Final - Current Operating Experience During License Renewal; RIS 2014-06, Revision 1 ([ML23167A044](#))
- Draft - Required Assessments of DOE Labs ([88 FR 69555](#); comment closure December 5)

INFORMATION NOTICES (INS)

- Fire Protection issues ([ML23088A143](#))
- Power Operated Valve Inspections Lessons Learned ([ML23129A014](#))
- Non-Power Production and Utilization Facilities Lesson Learned ([ML23059A539](#))
- Discontinuation of recognition of American Board of Radiology training certification (pending)

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Process for Ongoing Assessment of Natural Hazard Information

Ed Miller

NRR/DORL

Kevin Quinlan

NRR/DEX

November 28, 2023

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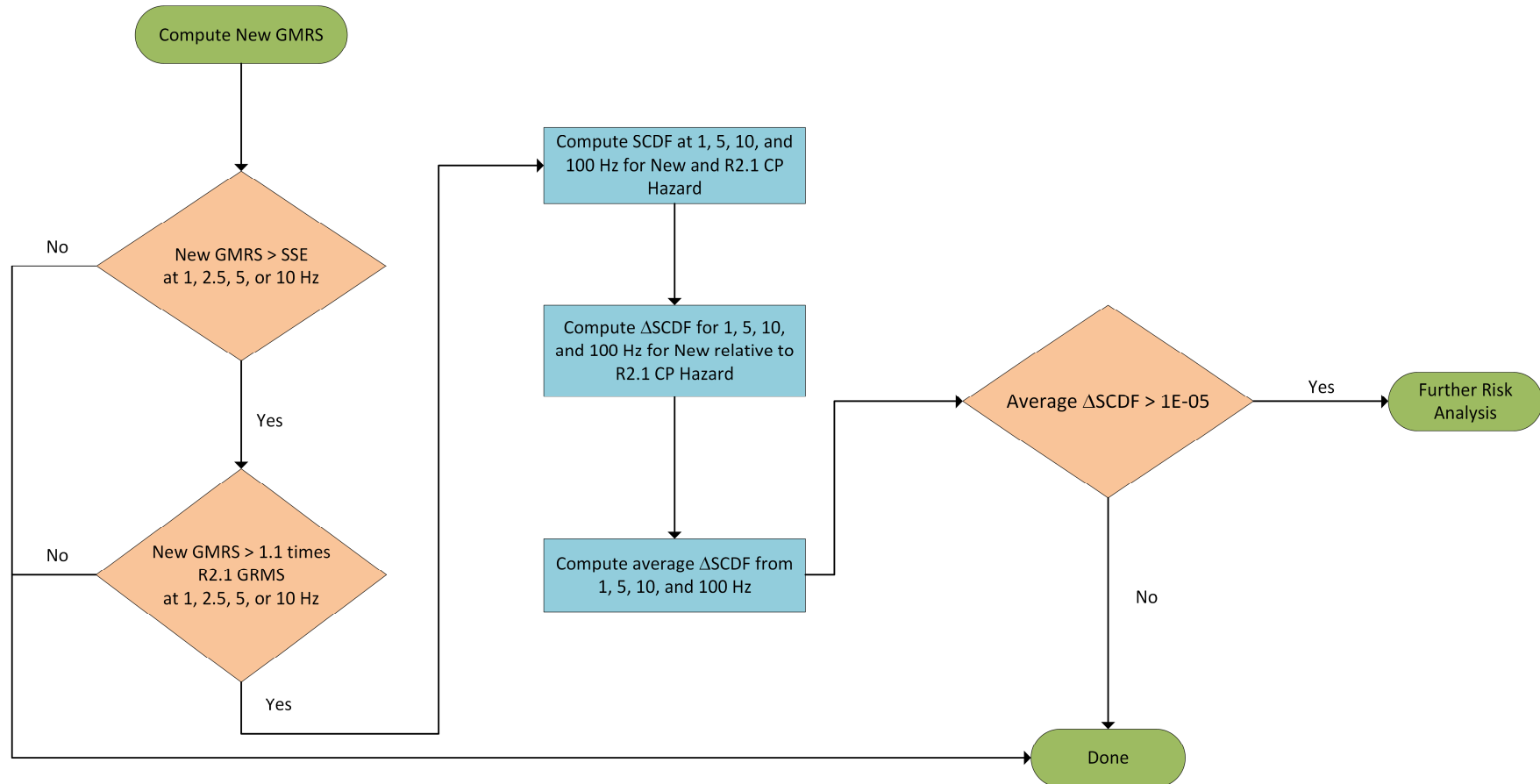
POANHI PROCESS FOR SEISMIC EVALUATIONS

Six POANHI seismic hazard and risk evaluations have been completed:

- Implemented hazard and risk screening process for each plant
- Plants have screened out
- POANHI seismic hazard reports for each plant site have been made publicly available in ADAMS. Reports provide:
 - Description of seismic hazard reevaluation
 - Multiple tables of site geologic profile, Ground-Motion Response Spectrum (GMRS), and hazard curves

POANHI seismic evaluations ongoing for remaining Near-Term Task Force (NTTF) Recommendation 2.1 Group 1 plants

POANHI DECISION-MAKING FLOWCHART



SEISMIC RISK EVALUATION USING POANH1 HAZARD – GENERAL APPROACH

- Use **latest available information to obtain a key input** (termed plant-level fragility) for risk evaluation.
 - SPRA results, if licensee submitted a SPRA report in response to post-Fukushima actions
 - Risk-informed LARs or GI-191 information, if licensee did not submit a SPRA report in response to post-Fukushima actions
 - Consistent with approach discussed in previous public meetings.
- Use convolution approach as discussed in previous public meetings.
- Use **average of 1, 5, 10, and 100 Hz** results consistent with approach in flowchart and discussions in previous public meetings.

ADDITIONAL RISK EVALUATION

- Utilize available plant-specific seismic risk insights; Examples:
 - Dominant risk contributors
 - Frequencies of interest based on differences between NTTF 2.1 and POANHI GMRS
 - Safety enhancements performed by licensee via permanent plant modifications
- If issues resolved, issue final letter and hazard report
- If issues remain:
 - Engage Senior Management Review Panel (SMRP)
 - Enter formal regulatory process, if approved by SMRP

APPROACH

- DORL PM will issue letter to licensee documenting results of NRC staff evaluation
- Any outcome other than no further regulatory action will have licensee engagement before letter is issued
 - NRC is internally considering methods of licensee engagement
- As with normal ListServ process, letter will not be made publicly available in ADAMS for about 5 days following issuance
- Licensees can engage through their assigned PM if they have any technical questions about the report

POANHI SEISMIC EMAIL ACCOUNT

- Members of the public and external stakeholders can submit any comments or feedback to the staff by emailing POANHI.Seismic@nrc.gov
- Future comments should continue to be sent to email address above

SCHEDULE

Complete

- Vogtle (ML23006A091)
- Sequoyah (ML23192A447)
- Watts Bar (ML23192A447)
- Browns Ferry (ML23192A447)
- North Anna (ML23214A177)
- Robinson (ML23244A231)

Upcoming (Estimated dates)

- Summer (Q4 2023)
- Peach Bottom (Q4 2023)
- DC Cook (Q4 2023)
- Dresden (Q1 2024)
- Oconee (Q1 2024)
- Callaway (Q2 2024)
- Beaver Valley (Q2 2024)

POANHI RECENT UPDATES

- NRC Staff published the POANHI public website, which can be found at: <https://www.nrc.gov/reactors/operating/ops-experience/poanhi.html>
- The intent of this site is to provide updates on staff activities related to hydrology, meteorology, geology, and seismology, as well as answering many frequently asked questions about POANHI. This website also includes an email address where members of the public and external stakeholders can submit any comments or feedback related to seismic hazards to the staff.

POANHI NATURAL HAZARDS INFORMATION DIGEST (NHID)

- The NRC conducted a modification on the existing contract with Idaho National Laboratory, which hosts and maintains the Natural Hazards Information Digest (NHID)
 - Planned updates over the next year include the addition of volcanic hazards and an expansion of scope beyond natural hazards associated with POANHI via the inclusion of human-induced external hazards for sites where these hazards are applicable
 - NRC staff conducted outreach sessions to areas of the agency that would find the information in the NHID to be useful
 - Staff continues to seek feedback from internal stakeholders to improve the functionality and the usefulness of the NHID

POANHI OUTREACH

- NRC staff cooperated with resident inspectors and project managers at six plants located along the Mississippi River on potential low-water concerns and its impacts on the performance of the nuclear power plants.
- During this time, the Mississippi River was experiencing lower-than-normal water levels. The staff reviewed available information from the updated final safety analysis reports (UFSARs) of the NPPs.
- Based on coordination with the pertinent project managers and resident inspectors, the NRC determined that the low-water conditions on the Mississippi River effort did not require placement into a regulatory process for further action.

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RG 1.183 Revision 1 Update

Kevin Hsueh

Branch Chief, NRR/DRA/ARCB

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RG 1.183 REVISION 1 UPDATE

- On September 6, staff briefed the Advisory Committee on Reactor Safeguards (ACRS) full committee on the draft final Revision 1 of RG 1.183 “Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactor.”
- Staff developed Revision 1 based upon experience since issuing Revision 0, research data, new analyses, and significant stakeholder involvement.
- Guidance advancements in Revision 1 included expanding Revision 0’s applicability to encompass fuel burnup extensions to 68 GWd/MTU rod average and enrichments up to 8 weight-percent U-235 for certain near-term ATF designs.

RG 1.183 REVISION 1 UPDATE

- On September 20, 2023, ACRS issued a letter ([ML23256A179](#)) to the NRC Chair recommending that Revision 1 should be issued.
- ACRS also recommended that Revision 2 should be developed and the schedule for this development should be aligned with the Increased Enrichment rulemaking.
- On October 16, 2023, the FRN ([88 FR 71277](#)) announcing issuance of Revision 1 was published.

RG 1.183 REVISION 1 UPDATE

- In response to the ACRS' recommendation, staff has started to work on Revision 2 with a proposed schedule to complete the draft Revision 2 in December 2024 to be aligned with the current Increased Enrichment proposed rule schedule to the Commission.
- Similar to the Revision 1 development, staff plans to hold multiple public meetings to seek stakeholders' input and feedback on the proposed changes to Revision 1.
- Staff plans to commence these public engagements with the stakeholders in January 2024 to meet the Revision 2 schedule.

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Risk Informed Process for Evaluations

Michele Kichline

NRR/DRA

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AGENDA

- Communicate NRC's assessment of the Nuclear Energy Institute's (NEI's) recommendations to enhance use of the Risk-Informed Process for Evaluations (RIPE).
- Communicate the path forward for incorporating NEI's recommendations into the NRC's RIPE guidance documents:
 - Temporary Staff Guidance (TSG) TSG-DORL-2021-01, "Risk-Informed Process for Evaluations," (Currently Revision 3 - [ML23122A014](#)) and
 - "Guidelines for Characterizing the Safety Impact of Issues" (SIC) (Currently Revision 2 - [ML22088A135](#)).

NEI FEEDBACK

- NEI submitted feedback on RIPE by letter dated April 19, 2023 ([ML23163A048](#)).
- The letter included two recommendations.
- NEI recommendation #1 was to revise of the risk acceptance criteria to allow the use of RIPE when:
 - The issue contributes less than 5×10^{-7} /year to core damage frequency (CDF).
 - The issue contributes less than 5×10^{-8} /year to large early release frequency (LERF).
- NEI recommendation #2 was to not treat the risk acceptance criteria as pass/fail criteria, consistent with the guidance in Regulatory Guide (RG) 1.174, Section 2.5.

NRC STAFF ASSESSMENT OF NEI RECOMMENDATIONS

- The NRC held a public meeting on October 5th to communicate our preliminary assessment of NEI's recommendations.
- The NRC responded by letter dated October 25, 2023 ([ML23285A270](#)) to NEI's recommendations with the staff's preliminary assessment.
- The NRC found NEI's recommendations to revise the risk acceptance criteria for RIPE reasonable because:
 - applications submitted under RIPE will be reviewed by NRC staff in accordance with the principles of risk-informed decision making (RIDM) in RG 1.174, and
 - the new acceptance criteria are indicative of a very small change in risk in accordance with RG 1.174.
- However, the NRC noted that increasing the risk acceptance criteria for RIPE should be accompanied by increased flexibility in the review timeline/resources.

NRC STAFF ASSESSMENT OF NEI RECOMMENDATIONS (CONTINUED)

- The NRC noted that NEI's recommendation to revise the risk acceptance criteria so that they are not pass/fail risk criteria could add complexity and delays in the review process that do not align with the goals of RIPE.
- However, the NRC will consider applications for review under RIPE with minor deviations from the RIPE acceptance criteria on a case-by-case basis.
 - For these case-by-case basis reviews where the RIPE risk acceptance criteria are slightly exceeded, the licensee should provide an explanation as to why the minor deviation is acceptable, such as an explanation of how the analysis provided is overly conservative.

PATH FORWARD TO INCORPORATE NEI RECOMMENDATIONS

- The NRC received NEI 21-01 Revision 2, “Industry Guidance to Support Implementation of NRC’s Risk-Informed Process for Evaluations,” in October 2023 ([ML23306A074](#)), which incorporates NEI’s recommendations.
- The NRC identified no major issues with NEI’s guidance.
- The NRC will revise the RIPE SIC and TSG to incorporate NEI’s recommendations, consistent with the staff's assessment.
- Ultimately, after the staff completes several additional RIPE reviews, the final agency position on RIPE will be provided using the Regulatory Guide process.

NEXT STEPS

Action	Date
<ul style="list-style-type: none">• Issue letter to NEI with results of our preliminary review of NEI 21-01 Revision 2	November / December 2023
<ul style="list-style-type: none">• Revise SIC to Revision 3<ul style="list-style-type: none">➤ Requires office level concurrence and review by the Office of Management and Budget (OMB)	Spring 2024
<ul style="list-style-type: none">• Revise TSG-DORL-2021-01 to Revision 4<ul style="list-style-type: none">➤ Requires office level concurrence	Spring 2024 (Issue with SIC)

US NUCLEAR REGULATORY
COMMISSION

Open Discussion

Bo Pham

Division Director, NRR/DORL

Brett Titus

Director of Licensing, NEI

November 28, 2023

PUBLIC MEETING WITH U.S. NRC AND NEI RITF

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OPEN DISCUSSION/STANDING TOPICS

- Forthcoming Process Changes
- Staffing, Budgeting, and Resources
- Reports on Timeliness Metrics, RAIs
- Trends/ Patterns/ Best Practices
- Knowledge Management
- RIC 2024

INFORMATION
FOR 2024
REGULATORY
INFORMATION
CONFERENCE

Jorge Hernandez-Munoz, RIC Co-Champion

Division of Advanced Reactors and Non-power Production and
Utilization Facilities
Office of Nuclear Reactor Regulation

Jonathan Evans, RIC Co-Champion

Division of Risk Analysis
Office of Nuclear Regulatory Research



RIC 2024 HYBRID

MARCH 12-14, 2024

Bethesda North Marriott Hotel
and Conference Center
Rockville, Maryland

ADAPTING TO A CHANGING LANDSCAPE

U.S. Nuclear Regulatory Commission
36th Annual Regulatory Information Conference

www.nrc.gov
#nrcric2024

- In keeping with the theme, “Adapting to a Changing Landscape,” the 2024 hybrid RIC will deliver a program that meets our goal of providing all attendees with important and relevant information with consideration to the changing landscape to the NRC’s safety and security mission.
- Featuring 24 Technical Sessions, 18 Digital Exhibit, and 4 Operations Center Tours
- The 2023 hybrid RIC had nearly 3,000 registrations from 43 countries, remaining consistent with registrations from the prior two virtual RICs, even after transitioning to hybrid for the year.
- Plenary session recordings will be available for viewing at <https://video.nrc.gov/>.

LOOKING FORWARD TO THE 2024 RIC:

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

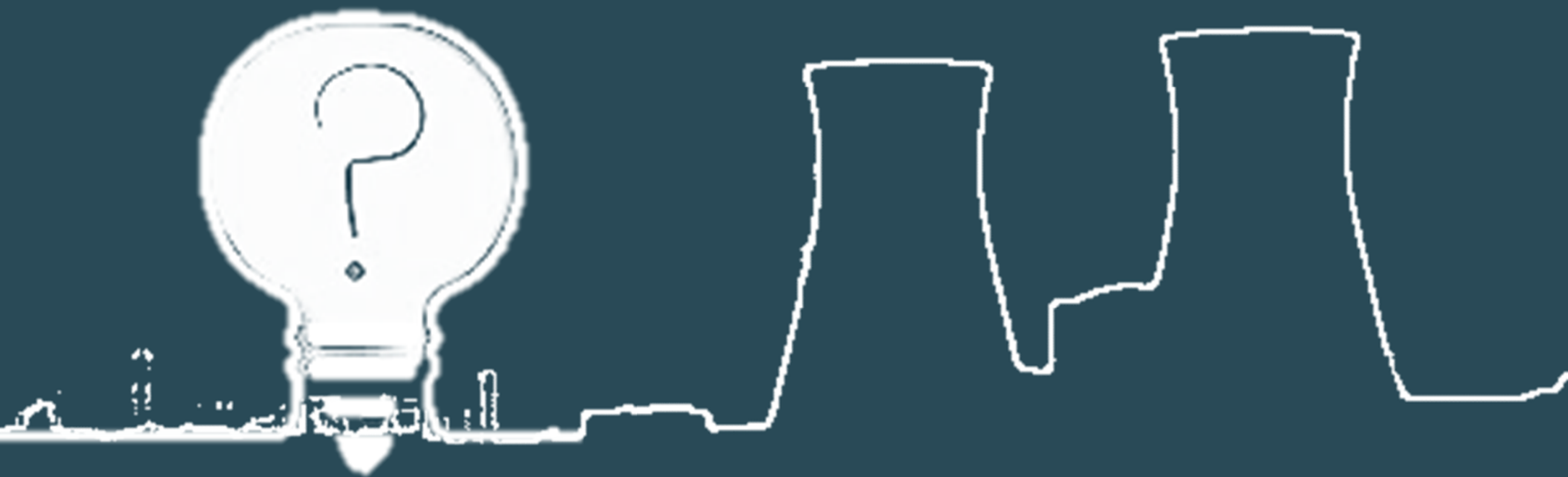
Conference agenda and technical
program currently being finalized.
Registration will open in January.

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.

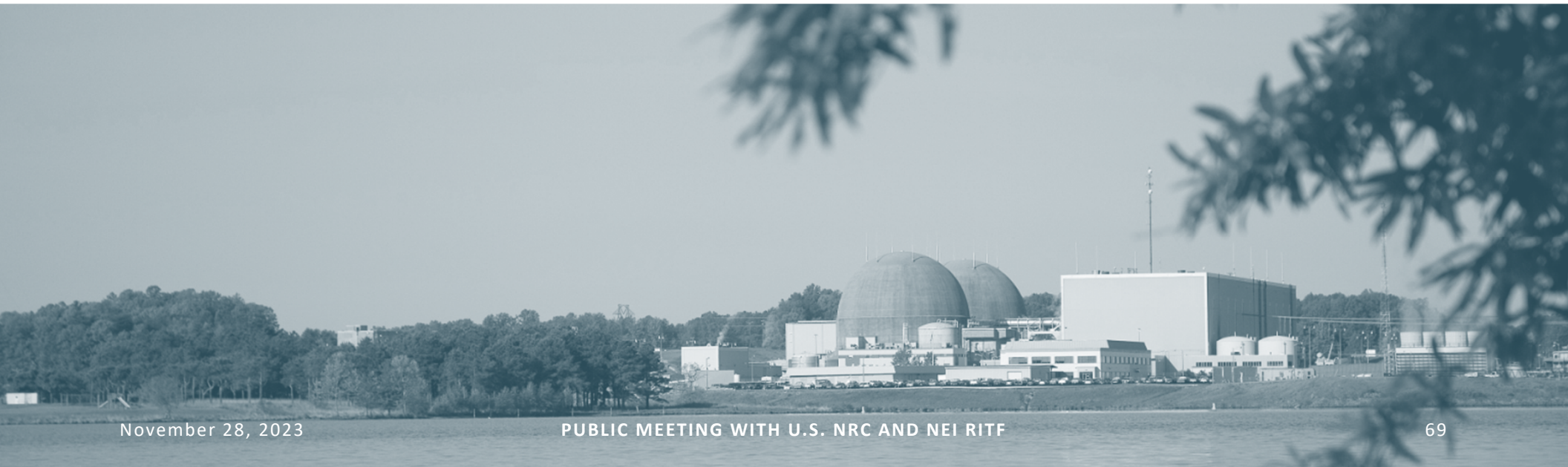
Please use the [Contact Us](#) form on
the RIC public website if you have
any questions or want to share
feedback with the NRC.



QUESTIONS AND/OR COMMENTS



OPPORTUNITY FOR PUBLIC QUESTIONS AND/OR COMMENTS



November 28, 2023

PUBLIC MEETING WITH U.S. NRC AND NEI RITF

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CLOSING REMARKS



November 28, 2023

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