



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200
ATLANTA, GEORGIA 30303-1257

February 5, 2024

MEMORANDUM TO: Nicole Covert, Director (Acting)
Division of Construction Oversight
Region II

FROM: Luis Colon Fuentes, Construction Inspector
Construction Inspection Branch 1
Division of Construction Oversight
Region II

SUBJECT: PUBLIC MEETING SUMMARY - FUEL CYCLE CONSTRUCTION
OVERSIGHT WORKSHOP PUBLIC MEETING ON JANUARY 11, 2024

Luis Colon Fuentes

Signed by Colon Fuentes
on 02/05/24

The staff of the U.S. Nuclear Regulatory Commission (NRC) conducted a hybrid meeting (in-person and virtual via Microsoft Teams) with representatives of the Nuclear Energy Institute (NEI), licensees and applicants in the fuel facility industry, and members of the public on January 11, 2024. The purpose of the meeting was to discuss proposed updates to the construction inspection program for fuel cycle facilities. Topics discussed included: updates to and applicability of Inspection Manual Chapters (IMC) 2600 and IMC 2694 regarding inspection of modifications at existing facilities and construction of new facilities; description and development of new consolidated Inspection Procedures (IP) 88200, 88201, and 88202 associated with inspection of safety significant items (and services), management measures, and operational readiness, respectively, for major modifications at existing facilities and construction of new facilities; and fuel facility budget and fee topics.

The public meeting notice with the agenda, and the meeting presentations are available in the Agencywide Documents Access and Management System (ADAMS) under Accession Numbers: ML24010A123, ML23335A175, and ML24010A098.

Meeting Summary:

The meeting began with the NRC providing an overview of the meeting's purpose and logistics. Opening remarks were made by Anthony Masters, Director, Division of Fuel Facility Inspection, Region II.

After opening remarks, the NRC staff provided a series of presentations followed by question-and-answer sessions. The presentations covered draft language and proposed updates to IMCs 2600 and 2694 and the associated IPs 88200 – 88202 series. Discussions of proposed changes to IMC 2600 pertained to modifications to existing licensees of fuel cycle facilities (FCFs), including estimated inspection hours for major modifications performed by existing licensees under the IMC 2600 oversight process. Discussions of proposed changes to IMC 2694 pertained to construction and pre-operational readiness review inspection program for new applicants and new licensees of FCFs. The staff presented the new construction IPs 88200, 88201, and 88202 for technical, management measures, and operational readiness review

Enclosure

inspections, respectively. These discussions included draft language and examples of IP implementation for the different types of inspections. After the IMC and IP presentations, Office of Nuclear Material Safety and Safeguards (NMSS) staff led a discussion on fuel facility budget and fee topics.

Closing remarks were given by Omar López-Santiago, Deputy Director (Acting), Division of Fuel Management, NMSS.

Below is a summary of comments and discussions:

- During the presentation, the staff emphasized that the inspection guidance updates for the 5-year periodic programmatic review were intended to add clarity, transparency, and consistency as part of these revisions.
- The staff discussed that the existing framework and guidance provided by IMC 2600 continues to adequately address inspection oversight for modifications for existing licensees, including those modifications that are large and complex.
- The staff discussed the NRC's graded approach to modification inspections and highlighted the NRC's focus and efforts to ensure inspection scope is risk informed and right sized for the activity at hand. For IMC 2600, the staff discussed the draft language for the term "major modification" and noted inspection hours in IMC 2600 Appendix B to address these inspections, on an as needed frequency.
- For construction activities associated with new applicants or new licensees, the staff discussed continuing to utilize IMC 2694, which establishes a construction inspection program for inspecting safety significant items and services, like items relied on for safety (IROFS) and associated activities, that are conducted by the licensee and its consultants, contractors, and suppliers to support the decision to allow operation of the facility.
- Stemming from this meeting, the NRC has committed to continued dialogue with interested stakeholders related to fuel facility construction inspection program IMC and IP development via additional public meetings, as needed. Staff was asked questions and provided comments for the following topics:
 - NRC communications with the licensee/applicant regarding when the Principal Inspection Plan is developed.
 - Consider use of wording for "at-risk" associated with open items and "self-imposed standard."
 - Consider providing examples of non-IROFS that fall into the category of safety significant items (and services).
 - Clarification on management measures (MM) and how they are implemented during construction and what are the NRC expectations for implementation. (e.g. MM training and qualification implementation during construction)
 - Clarification of expectations for MM flow down to subcontractors' processes during construction.

- During the discussion of fuel facilities budget and fees, NRC staff acknowledged that despite our continued focus to ensure the budget aligns with the anticipated workload, changes in the timing of submittals can have real impacts on existing licensees and their annual fees. NRC staff explained the relationship between the budget and fees and the points during budget formulation and execution at which the NRC can account for fact of life changes. The NRC staff also provided feedback on the proposals included in NEI's December 1, 2023, letter (Agencywide Document Access Management System Accession No. ML23335A175), offering options for funding the fuel facility business line to prevent large fluctuations in annual fees based on changes in the timing of licensee and applicant submittals. Finally, NRC staff identified ways for the NRC and industry to improve estimates of anticipated work during budget formulation.

In accordance with Title 10 of the Code of Federal Regulations (CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room (PDR) or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Should you have any questions concerning this meeting, please contact Nicole Coover at (404) 997-4510.

Enclosure:
List of Attendees

Enclosure

SUBJECT: PUBLIC MEETING SUMMARY - FUEL CYCLE CONSTRUCTION OVERSIGHT
WORKSHOP PUBLIC MEETING ON JANUARY 11, 2024

DISTRIBUTION:

S. Lav, NMSS

O. López-Santiago, NMSS

A. Masters, RII/DFFI

ADAMS ACCESSION NUMBER:ML24033A212

<input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	RII/DCO	RII/DCO	RII/DCO		
NAME	G. Khouri	A. Ponko	L. Colon Fuentes		
DATE	2/2/2024	2/5/2024	2/5/2024		

LIST OF ATTENDEES

This list of Attendees was captured via the in-person and virtual attendance sheets:

Name	Organization
David H. Tiktinsky	Boston Government Services, LLC
Ashley R. Morris	BWXT
Daniel L. Ashworth	BWXT
Jason K. Krumenacker	Centrus Energy
Joshua W. Adams	Centrus Energy
Robert P. Jacobs	Centrus Energy
Calvin Manning	Framatome
Timothy Tate	Framatome
James C. Kinsey Jr	Idaho National Laboratory
Bob Link	Nuclear Energy Institute
Janet Schlueter	Nuclear Energy Institute
Tim Knowles	Nuclear Fuel Services
Zachary Betsill	Southern Company
Charlyne A. Smith	University of Florida
Chris Schwarz	Urenco USA
Wyatt Padgett	Urenco USA
Amanda J. Spalding	Westinghouse
Camille T. Zozula	Westinghouse
Stephen G. Subosits	Westinghouse
Gerard Couture	No Organization Provided
Jim Tomkins	No Organization Provided
Oliver Barrett	No Organization Provided
Tim	No Organization Provided
Aaron Thomlinson	NRC
Aida Rivera-Varona	NRC
Anthony Masters	NRC
Anthony Ponko	NRC
Anthony Rossi	NRC
Benjamin Karmiol	NRC
Billy Blaney	NRC
Cameron Ubben	NRC
Chad Oelstrom	NRC
Cindy Bladey	NRC
Cynthia Taylor	NRC
Dave Gasperson	NRC
Diana Woodyatt	NRC
Edward Madden	NRC
Emma Duncan	NRC
Eric C. Michel	NRC
Ethan Licon	NRC
Fred Miller	NRC
Gayatri Mostaghimi	NRC

Enclosure

LIST OF ATTENDEES

George Khouri	NRC
Gregg Goff	NRC
James Downs	NRC
Jasmine Stanley	NRC
Jen Scro	NRC
Jenny Tobin	NRC
Jo Jacobs	NRC
Joel Rivera Ortiz	NRC
Joseph Grice	NRC
Joseph Rudd	NRC
Joylynn Quinones-Navarro	NRC
Kellee Jamerson	NRC
Krupskaya Castellon	NRC
Larry Harris	NRC
Laura Dudes	NRC
Leonard Pitts	NRC
Lindsey Cooke	NRC
Luis Colon Fuentes	NRC
Marilyn Diaz Maldonado	NRC
Matt Bartlett	NRC
Matthew Doyle	NRC
Meg Day	NRC
Michael Greenleaf	NRC
Nicole Coover	NRC
Noah Woodyard	NRC
Noel Pitoniak	NRC
Omar Lopez-Santiago	NRC
Raju Patel	NRC
Robert Mathis	NRC
Robert Williams	NRC
Samantha Lav	NRC
Shana Helton	NRC
Sheila Coleman-Turner	NRC
Suzanne Dennis	NRC
Thomas Vukovsky	NRC
Timothy Sippel	NRC
Todd Shewmaker	NRC
Tricia Lizama	NRC