Fuel Facility Stakeholders Meeting

November 13, 2024

Public Meeting With Nuclear Energy Institute
and Members from the Nuclear Fuel Facility Industry

Jonathan Rowley, Project Manager
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
Email: Jonathan.Rowley@nrc.gov
Phone: 301-415-4053

Meeting Category and Public Participation

This is an Observation Meeting. This is a meeting in which attendees will have an opportunity to observe the NRC performing its regulatory function or discussing regulatory issues. Attendees will have an opportunity to ask questions of the NRC staff or make comments about the issues discussed following the business portion of the meeting; however, the NRC is not actively soliciting comments towards regulatory decisions at this meeting.

Agenda – November 13, 2024

Topic	Time	Speakers
Introduction (Purpose, Rules for Meeting)	8:30 AM	Jonathan Rowley, Project Manager Division of Fuel Management (DFM)
Opening Remarks	8:35 AM	Shana Helton, Director Division of Fuel Management Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission Greg Core, Director Fuel Cycle Facilities Nuclear Energy Institute (NEI)
Status of Action Items from November 2023 Meeting	8:50 AM	Jonathan Rowley, Project Manager, DFM
Integrated Schedule and Supplement Updates	8:55 AM	Jonathan Rowley, Project Manager, DFM NRC Staff
Timeliness of Decommissioning Funding Plan Reviews	9:30 AM	NRC/NEI
Public Question and Answer	10:00 AM	Public
Break	10:05 AM	
ADVANCE Act	10:15AM	NEI/NRC

Agenda – November 13, 2024 (cont.)

Topic	Time	Speakers
Public Question and Answer	12:00 PM	Public
Lunch Break	12:05 PM	
Budget Matters: Effort Factors	1:15 PM	Diana Woodyatt, DFM
Current Licensing Program Feedback and Recent Interactions	1:45 PM	Kimyata Morgan-Butler, Deputy Director DFM
Update on ISA Considerations and Designations of IROFS for Natural Phenomena Initiated Events	2:15 PM	James Downs, DFM Jonathan Marcano, DFM
Public Question and Answer	2:45 PM	Public
Break	2:50 PM	
Feedback on Public-Facing Dashboard	3:00 PM	Matt Bartlett, DFM
Report on the Industry Regulatory and Inspection Summit and Applicability to Fuel Cycle Facilities	3:30 PM	LaDonna Suggs, Director Division of Fuels, Radiation Safety, and Security Region II
Public Question and Answer	4:00 PM	Public
Recap of Action Items for the Day	4:05 PM	Jonathan Rowley, DFM Greg Core, NEI
Closing Remarks and Adjourn	4:10 PM	Shana Helton, DFM Greg Core, NEI

Opening Remarks

Shana Helton, Director

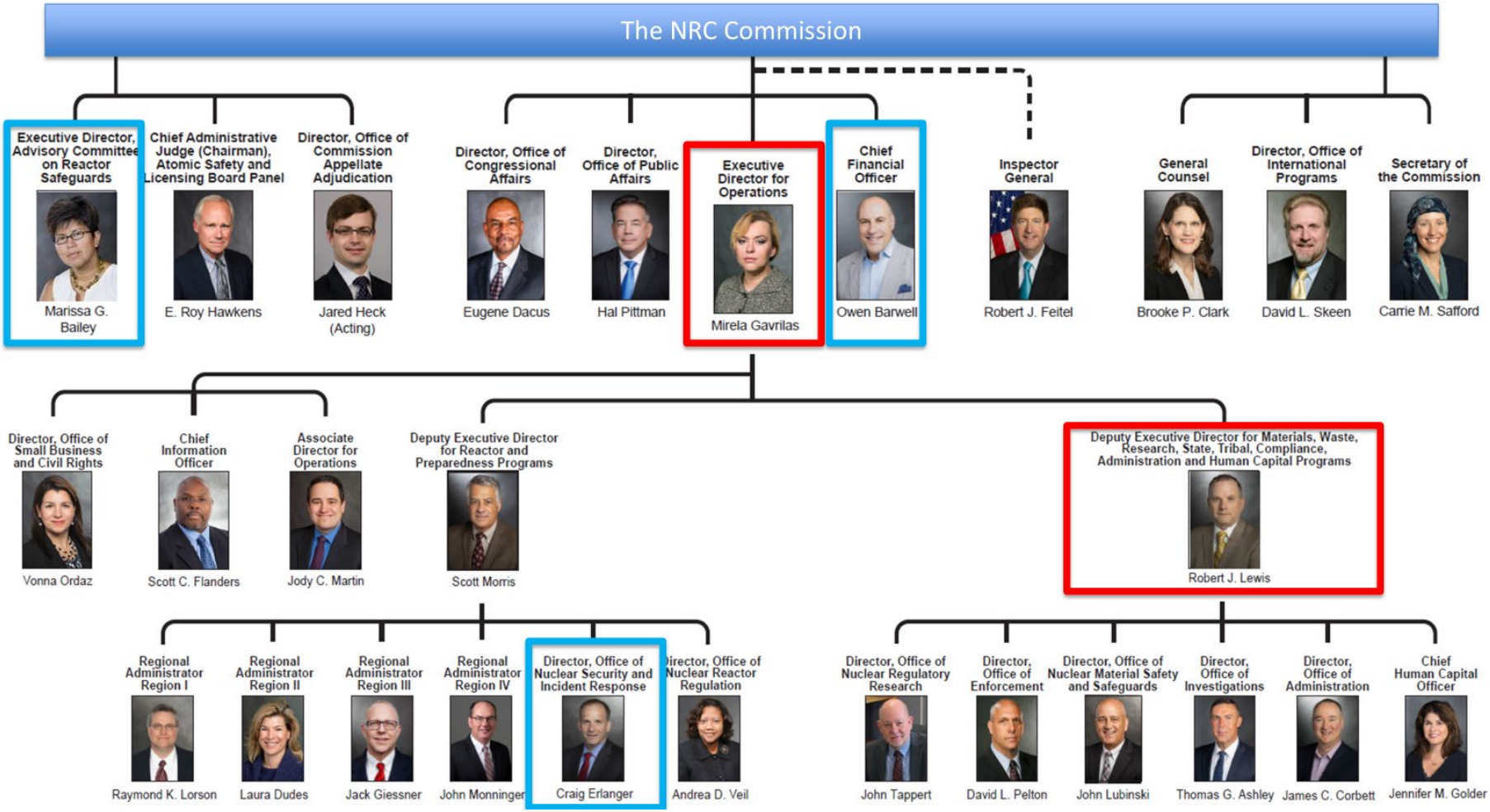
Division of Fuel Management

Office of Nuclear Material Safety and Safeguards

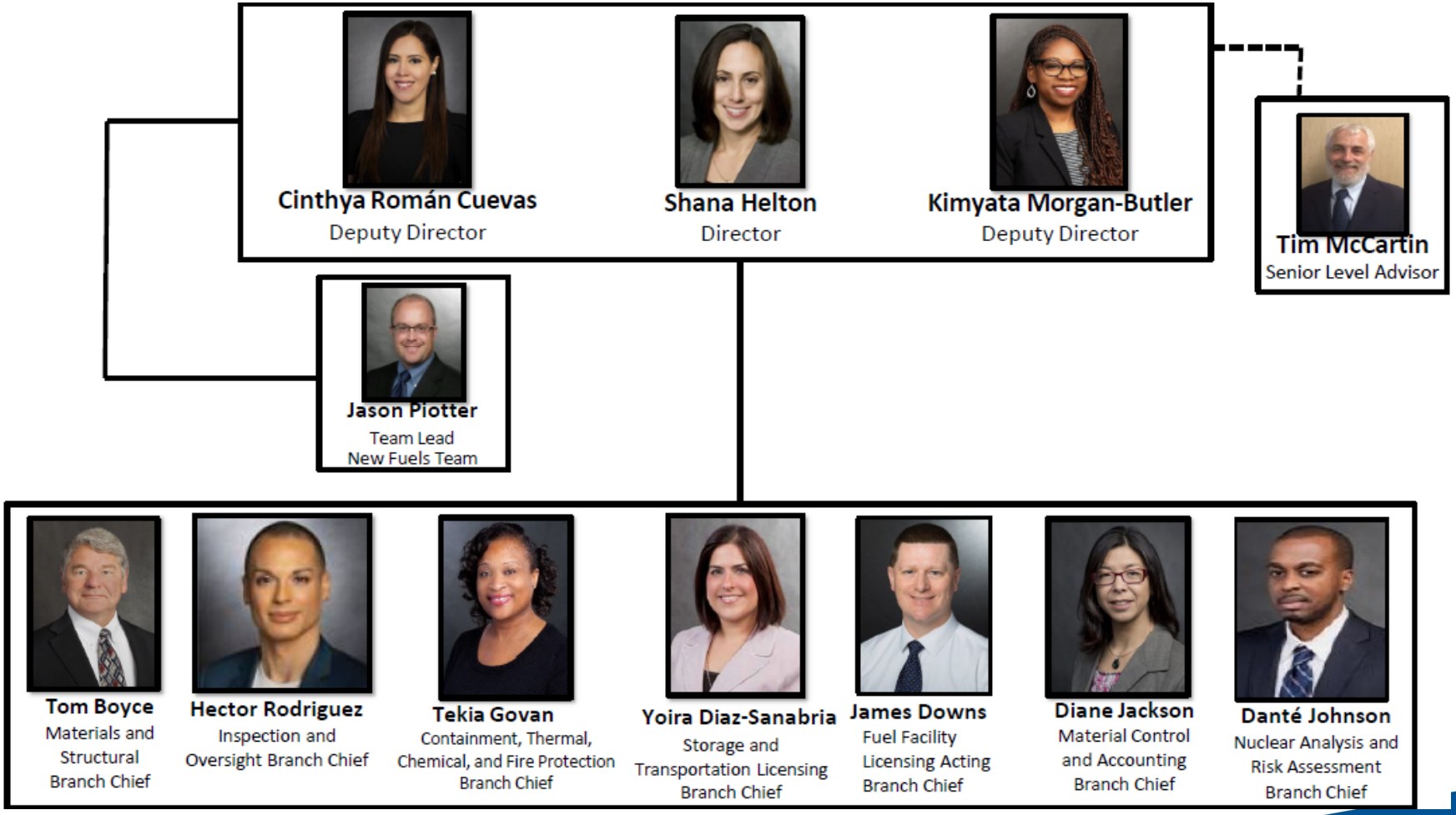
Greg Core, Director

Fuel Cycle Facilities

Nuclear Energy Institute



Division of Fuel Management



Region II
Division of Fuels, Radiation Safety, and Security

ORGANIZATIONAL CHART
REGION II
FUEL CYCLE BUSINESS LINE

LaDonna Suggs, Director, DFRSS
Ravi Penmetsa, Deputy Division Director, DFRSS
Michael Greenleaf, Technical Assistant
Jaedyn Doiley, Administrative Assistant

FUELS OVERSIGHT BRANCH 1 Branch Chief Bradley Davis	FUELS OVERSIGHT BRANCH 2 Branch Chief Eric C. Michel Noah Woodyard, Co-Op
Nuclear Fuel Services (NFS) Nicholas Peterka, Sr. Project Inspector Lindsey Cooke, Project Inspector Larry Harris, Sr. Resident Inspector Pamela Kruger, Administrative Assistant	BWXT Noel Pitoniak, Sr. Project Inspector Chad Oelstrom, Project Inspector Matt Doyle, Sr. Resident Inspector Evelyn Andrews, Administrative Assistant
Global Laser Enrichment (GLE) Leonard Pitts, Sr. Project Inspector Joseph Grice, Project Inspector	Framatome Cynthia Taylor, Sr. Project Inspector Meg Day**, Project Inspector Kelly Sullivan**, Project Inspector
Urenco USA (LES) Timothy Sippel, Sr. Project Inspector Paul Startz, Project Inspector Todd Shewmaker, Project Inspector	Honeywell Tom Vukovinsky, Sr. Project Inspector Gregory Goff, Project Inspector
Global Nuclear Fuels - America (GNF-A) Leonard Pitts, Sr. Project Inspector Cameron Ubben**, Project Inspector	Westinghouse Tom Vukovinsky, Sr. Project Inspector Justin Raudabaugh, Project Inspector
Centrus Facilities (ACO-ACP, ACO-OR, ACO-HQ) Leonard Pitts, Sr. Project Inspector Joseph Grice, Project Inspector	X-Energy Cynthia Taylor, Sr Project Inspector Chad Oelstrom, Project Inspector
Fort Saint Vrain (FSV) Leonard Pitts, Sr. Project Inspector Joseph Grice, Project Inspector	
SHINE/Niowave Timothy Sippel, Sr. Project Inspector	

COMMUNITIES OF PRACTICE (CoP)

INFOSEC	Material Control & Accounting (MC&A)	Criticality Safety	Radiation Safety/EP/Transportation/Env
Leonard Pitts, Lead Tom Vukovinsky Noel Pitoniak Joseph Grice**	Noel Pitoniak, Lead Tom Vukovinsky Nick Peterka** Lindsey Cooke	Timothy Sippel, Lead Nick Peterka Todd Shewmaker** Kelly Sullivan**	Cynthia Taylor, Lead Gregory Goff Paul Startz Justin Raudabaugh Lindsey Cooke
Fire Protection			
Timothy Sippel, Lead Chad Oelstrom			

* Currently on rotation.
** In training.

Action Items from May 2024 Fuel Facility Stakeholders Public Meeting

Jonathan Rowley, Project Manager

Division of Fuel Management

Office of Nuclear Material Safety and Safeguards

Action Items – May 2024 Stakeholders Meeting

Action Item 1	Action Item 2	Action Item 3
The NRC and NEI/Industry shall exchange any meeting presentation materials at least one week prior to the scheduled meeting date. NRC Staff Resolution DFM developed guidance for planning and conducting the bi-annual fuel facility stakeholders meeting. The guidance will ensure that information will be available to the public at least 7 days prior to the meetings. (*Ongoing Periodic Action*)	The NRC staff will maintain a current integrated schedule of regulatory activities chart on the NRC public website for the fuel facility stakeholders meeting. NRC Staff Resolution The integrated schedule is updated at least twice a year prior to each stakeholders meeting and as needed when new items are added. (*Ongoing Periodic Action*)	The NRC will consider adding the Department of Homeland Security initiative resulting from the Cyber Incident Reporting for Critical Infrastructure Act of 2022 (CIRCIA) to the integrated schedule of regulatory activities chart. The industry acknowledges that this is not within the NRC's purview but affects the fuel cycle industry. NRC Staff Resolution To maintain the clear and effective communication provided by the Integrated Schedule of Regulatory Activities, content of the chart will remain limited to activities directly under NRC's control. (*Closed*)
Action Item 4 If requested by the industry, the NRC will host a meeting to further discuss structures as items relied on for safety. NRC Staff Resolution A public meeting on integrated safety analysis consideration and designation of items relied on for safety was held on June 27, 2024.(*Closed*)		

Integrated Schedule Chart and Supplement Updates

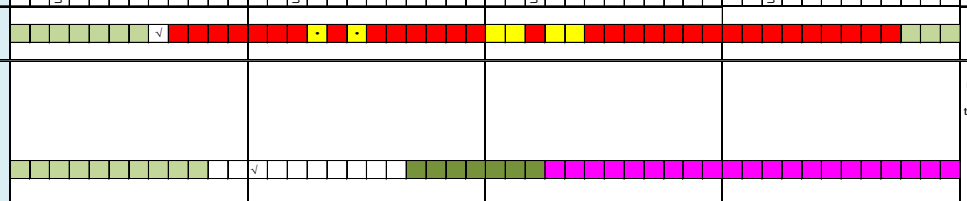
Jonathan Rowley, Project Manager

Division of Fuel Management

Office of Nuclear Material Safety and Safeguards

Integrated Schedule Chart Updates

Regulatory Activity	Revised	Comments
Part 73 - Enhanced Security of SNM (SECY-19-0095) Marshall Kohen/George Tartal	10/11/2024	A SECY paper on this topic is anticipated to be sent to the Commission in October 2024.
Part 73 - Enhanced Weapons Rulemaking (SECY-18-0058) Phil Brochman	10/15/2024	With the NRC's issuance of the last of three revised Reg Guides on September 10, 2024, the exemptions previously approved by the NRC on the final Enhanced Weapons rule will be expiring. These exemptions expire in either 180 days or 300 days from that date, as specified in an exemption. Licensees who obtained such an exemption should be transitioning into full compliance before then. For licensees who did not request an exemption, the original compliance date of January 8, 2024, remains in effect. Finally, enforcement guidance issued by the NRC under Enforcement Guidance Memorandum EGM-23-01 (ML23312A221) remains in effect pending the NRC's resolution of issues that require further rulemaking.
Part 73 - Cyber Security Rulemaking (SECY-17-0099) Irene Wu/James Downs	10/11/2024	The staff is awaiting Commission direction.
Integrated Low-Level Radioactive Waste Disposal Rulemaking (SECY-20-0098) George Tartal/Cardelia Maupin/Priya Yadav	10/11/2024	The proposed rule was sent to the Commission on May 29, 2024 via SECY-24-0045. The staff is waiting on the Commission to provide direction.
Decommissioning Financial Assurance for Sealed and Unsealed Radioactive Material (PRM-30-66; NRC-2017-0159) - (SECY-19-0125) Greg Trussell/Adam Schwartzman	10/11/2024	The proposed rule was submitted to the Commission on July 24, 2023. Awaiting Commission direction.
Final Rulemaking - Alternatives to the Use of Credit Ratings (RIN 3150-AJ92) (SECY-16-0009, SECY-20-0056) Greg Trussell	10/11/2024	The final rule was sent to the Commission on February 9, 2024. Awaiting Commission direction.
Harmonization of Transportation Safety Requirements with International Atomic Energy Agency Standards (RIN 3150-AJ85; NRC-2016-0179) - Part 71 (SECY-16-0093 and SECY-20-0102) Caylee Kenny	10/15/2024	The final rule is with the Commission as of August 20, 2024. Awaiting Commission direction.
Part 26 - Drug and Alcohol Testing: Technical Issues and Editorial Changes (NRC-2012-0079; RIN3150-AJ15) Stewart Schneider/Brian Zaleski	10/11/2024	The rulemaking plan was delivered to the Commission on July 9, 2024. Awaiting Commission direction.
Regulatory Information Conference Jonathan Rowley	10/11/2024	Presentations for previous RIC sessions are available online.
NUREG-1520 Updates TBD	10/11/2024	Future updates to NUREG-1520 are expected to address remaining long-term recommendation from the Smarter Licensing Program, lessons learned, and potential new fuels applications.
Very Low Safety Significance Issues Stephen Koenick	10/16/2024	Guidance development and improvement continues as experience is gained. Staff continues to updating IMCs with the memo/ISG language.
Controlled Unclassified Information Program Tanya Mensah	10/11/2024	The NRC's plans to implement MD 12.6 are delayed. A new date will be identified by OCIO after the National Security Council (NSC) Interagency Policy Committee (IPC) completes its efforts to identify Federal-wide CUI implementation challenges and proposed policy solutions. NRC's CUI public website: https://www.nrc.gov/reading-rm/cui.html
ADVANCE Act		NRC's public information site for ADVANCE Act updates: https://www.nrc.gov/about-nrc/governing-laws/advance-act.html



= Final Rule/Final Guidance
= Final Report/Closure Memo
= Denied by Commission
= Reg. Basis/Draft Guidance
= Scheduled Meeting
= Final Rule Development
= Public Interaction
= Pending Commission Action
√ = Marks issuance of SRM
= Proposed Rule/DG Development
I = Marks issuance of SECY
= ANPR Development
= Guidance Development
= Pilot Program
= Implementation
V = Site Visit
= Issue Draft Guidance
= ANPR Issued
= Pre-rulemaking Activities
= Non-rulemaking/NRC Activities
A = ACRS Meeting

U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

Updates to Integrated Schedule Chart and Supplement

- Updated information
  - Fuel Facility Stakeholders Meeting
    - https://www.nrc.gov/materials/fuel-cycle-fac/regs-guides-comm.html#cumeffects
  - Integrated Schedule (Chart)
    - ADAMS Accession Number ML24305A155
  - Integrated Schedule Supplement
    - ADAMS Accession Number ML24305A157
  - Summary of changes to previously listed activities (May – October 2024)
    - ADAMS Accession Number ML24305A156

Timeliness of Decommissioning Funding Plan Reviews

Kenneth Kline, Financial Analyst
Financial Assessment Branch,
Division of Rulemaking, Environmental, and Financial Support

Frequency of DFP Submittals

- **70.25 requires** funding for decommissioning prior to bringing material onsite and **updating the cost estimate at least every 3 years** until time of license termination (see 70.25(b)(2), **70.25(e)(2)**, 70.25(f)(2)(iii))

- **The basis for the three-year cycle is found in FR, Vol. 68, No. 192, Friday, October 3, 2003, p. 57331 -57332**. Although it would be less burdensome to require updates every 5 years as opposed to every 3 years, the NRC believes this would entail too great of a risk that cost estimates could become significantly low. The NRC's experience indicates that decommissioning cost estimates may fluctuate significantly in less than five years. Even where site conditions do not change, inflation may increase costs significantly. For example, if decommissioning costs were to rise by five percent annually (due to higher disposal costs, inflation, and/or other factors), then in only 3 years a previously accurate estimate would understate current costs by 15 percent. As a result, financial assurance would be low by the same amount. This would create an unacceptable risk of unfunded decommissioning obligations.

Timely NRC Review & Approval

- Timeliness and efficiency of reviews and RAI process are very important to NRC
- NRC's goal is to complete these reviews in under 6 months
- Complications that can impact review time include:
  - Technical, regulatory or other complexities
  - Quality, thoroughness and timeliness of RAI responses
- NRC engages industry (both before issuing RAIs and after) to resolve challenges and develop a path forward for subsequent reviews

Public Participation

At this time, the public is afforded an opportunity to ask questions and/or provide comments on the following topics:

- Status of Action Items
- Integrated Schedule and Supplement Updates
- Timeliness of Decommissioning Funding Plan Reviews

Accelerating Deployment of Versatile, Advanced Nuclear Clean Energy Act of 2024 (ADVANCE Act)

Shana Helton, Director

Division of Fuel Management

Office of Nuclear Material Safety and Safeguards

ADVANCE Act

The ADVANCE Act of 2024 was passed with unprecedented bipartisan support and signed by President Biden in July 2024.

PUBLIC MEETING – On October 16, the NRC held its first public meeting on implementation of the ADVANCE Act with over 200 attendees. *ML24285A217*

"…focusing on efficiency through risk-informing and continuous learning—was already underway at the NRC, the ADVANCE Act will help drive that efficiency mandate forward and provide us with additional tools for execution." – *Christopher Hanson, NRC Chair*

Overview of the Act

- Update mission statement
- Enhance initiatives to achieve efficient, timely, and predictable license application reviews
- Assess the licensing review process for new nuclear facilities at former fossil-fuel power plant and brownfield sites
- Develop strategies for microreactors
- Continue to support international coordination
- Implement new requirements relating to nuclear fuel

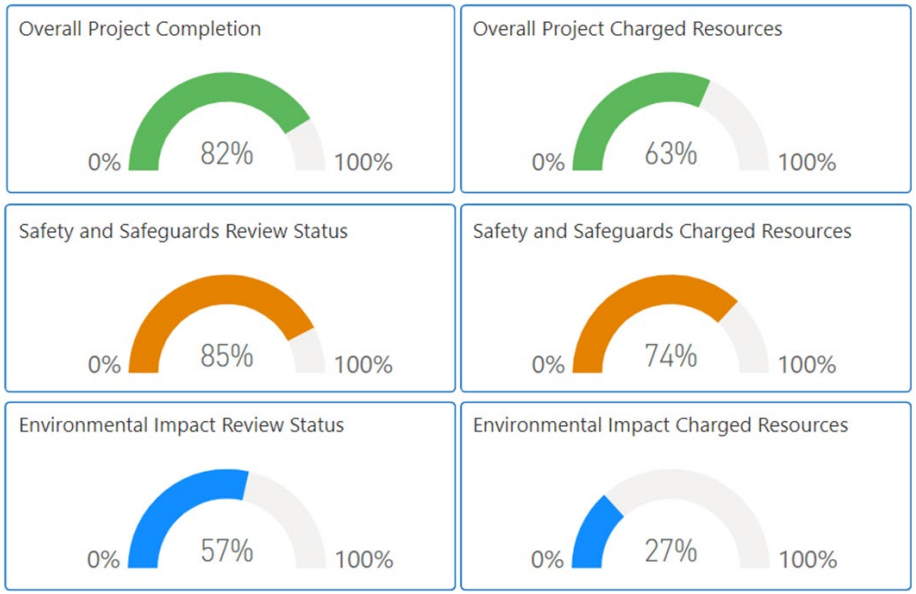
ADVANCE Act Task Assigned to or Supported by NMSS

- Denial of Certain Domestic Licenses for National Security Purposes and export license notification – Section 102, 103
- Regulatory Requirements for Micro-Reactors - Section 208
- Manufacturing & Construction for Nuclear Energy Projects – Section 401
- Advanced Nuclear Fuel cooperation with DOE – Section 404
- Mission Alignment – Section 501
- Performance Metrics & Milestones – Section 504
- Nuclear Reactor Licensing Efficiencies – Section 505
- Improving Oversight & Inspection Programs – Section 507

Use of Licensing Precedents

- NRC reviews each application based on its merit
- Licensing precedents can serve as review accelerators
  - Past precedents help to focus reviewer efforts
- NRC has approved applications for several new facilities
  - Staff safety evaluations are public
  - Applicants should discuss precedents and their applicability at pre-application meetings
- Targeted updates to NUREG-1520 may further improve efficiency and add clarity
  - Insights from recent regulatory reviews

Licensing Metrics and Transparency



Other suggestions?

Smarter Licensing

Process enhancements

- Acceptance letters w/ schedules and cost estimates
- Alignment on scope, focus of review

Public dashboards share real-time information about review status:

- RAI completion status
- Overall review completion status (safety, security, environmental)
- Staff level of effort / hours charged to applicant

Communications with applicants:

- Routine status calls (>1/month)

To Stay Informed of Progress

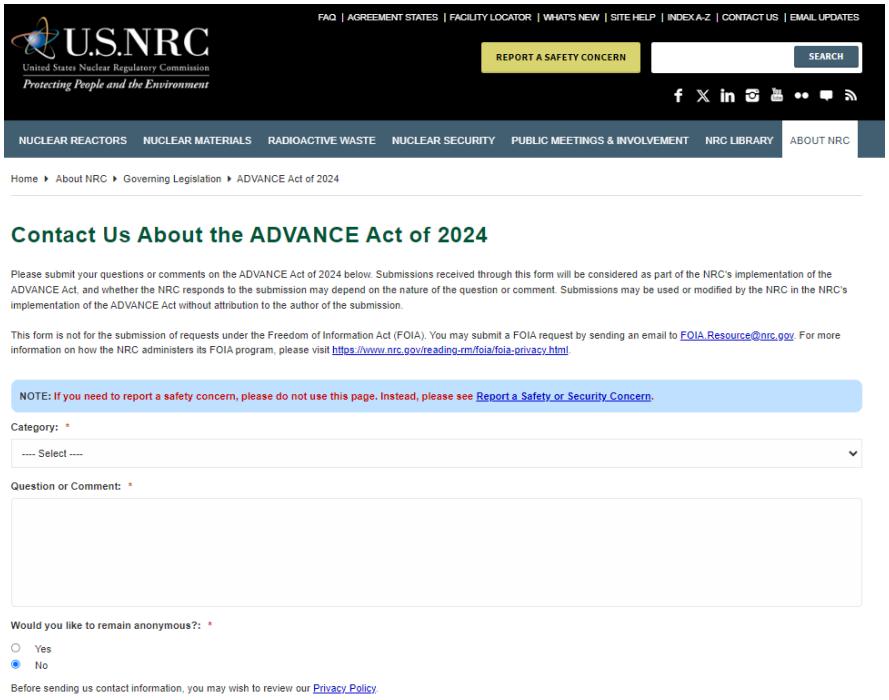
Follow NRC's ADVANCE Act implementation with this Dashboard

For Upcoming and Past Meetings

For NRC's public meeting information on ADVANCE Act

For Your Questions and Ideas

Contact us with ADVANCE Act questions, comments and ideas



U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

Effort Factors

Diana Woodyatt, Project Manager

Fuel Facility Licensing Branch

Division of Fuel Management

Office of Nuclear Material Safety and Safeguards

Effort Factors Background

- The NRC allocates annual fees to individual fuel facility licensees based on the effort/fee determination matrix developed in the FY 1999 fee rule (64 FR 31228; June 10, 1999).
- The matrix groups licensees within this fee class into various fee categories.
- The matrix lists processes that are conducted at licensed sites and assigns effort factors for the safety and safeguards activities associated with each process.
- The annual fees are then distributed across the fee class based on the regulatory effort assigned by the matrix.
- The effort factors in the matrix represent regulatory effort that is not recovered through 10 CFR part 170 fees (e.g., rulemaking, guidance). Regulatory efforts for part 170 fees are not applicable to the effort factor (such as inspections).
- There are seven fee categories:
  - High Enriched Uranium Fuel
  - Low Enriched Uranium Fuel
  - Limited Operations
  - Gas Centrifuge Enrichment Demonstration
  - Hot Cell (and others)
  - Uranium Enrichment
  - UF6 Conversion and Deconversion

Effort Factors Processes

- Solid UF6 Metal
- Enrichment
- Liquid UF6
- HEU Down Blend
- Conversion Powder
- Pellet
- Rod/Bundle
- Scrap/Waste
- Hot Cell
- Sensitive Information

Effort Factors Matrix Values

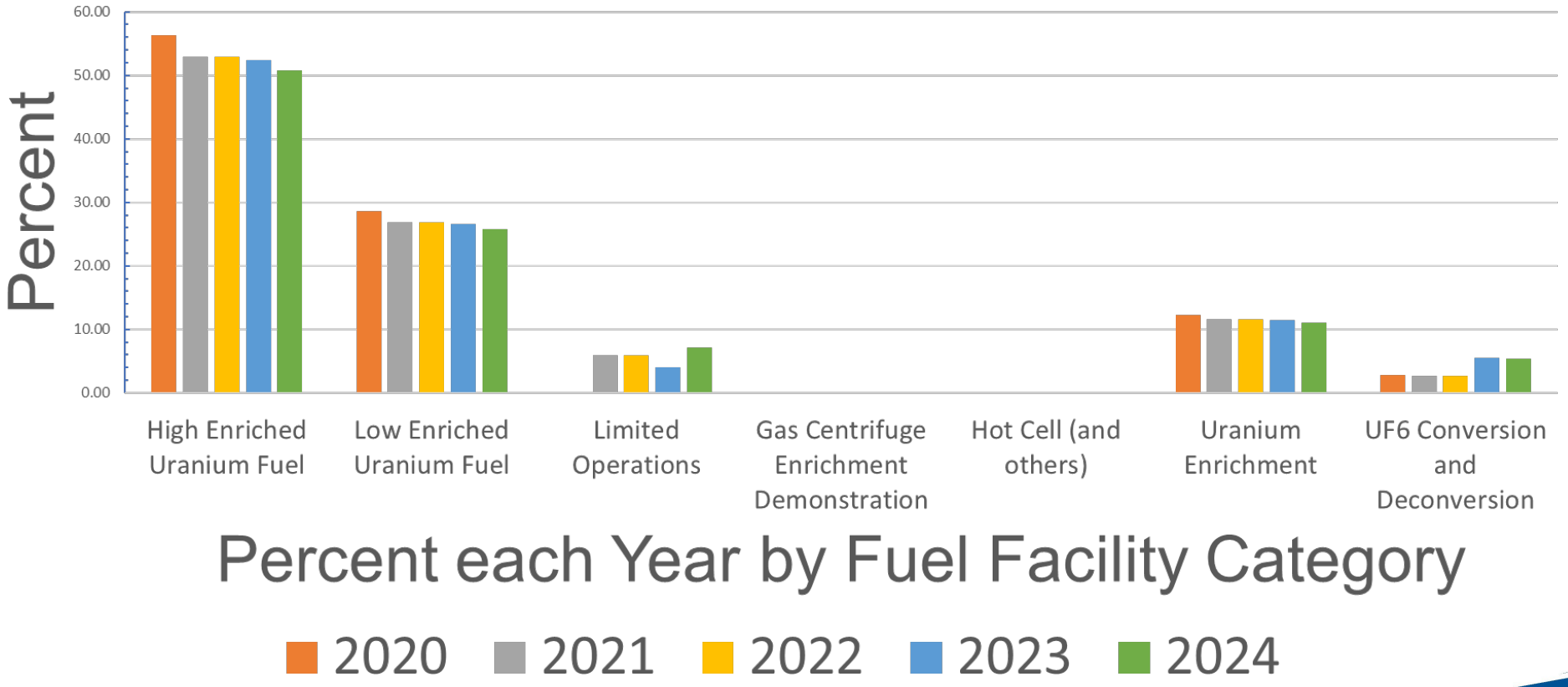
- The processes are evaluated with respect to safety and safeguards in each category according to the following values:

LEGEND	VALUE
HIGH	10
MODERATE	5
LOW	1
NONE	0

FY 2024 Fuel Facilities Effort Factors Matrix

Facility Type (Fee Category)	Number of Licensees	Effort Factors		
		Safety (%)	Safeguards (%)	Total Safety + Safeguards (%)
High Enriched Uranium Fuel (1.A.(1)(a))	2	88 (46.6%)	91 (55.5%)	179 (50.7%)
Low Enriched Uranium Fuel (1.A.(1)(b))	3	70 (37.0%)	21 (12.8%)	91 (25.8%)
Limited Operations (1.A.(2)(a))	1	3 (1.6%)	22 (13.4%)	25 (7.1%)
Gas Centrifuge Enrichment Demonstration (1.A.(2)(b))	0	0 (0%)	0 (0%)	0 (0%)
Hot Cell (and others) (1.A.(2)(c))	0	0 (0%)	0 (0%)	0 (0%)
Uranium Enrichment (1.E.)	1	16 (8.5%)	23 (14.0%)	39 (11.0%)
UF6 Conversion and Deconversion (2.A.(1))	1	12 (6.3%)	7 (4.3%)	19 (5.4%)
Total	**8**	**189 (53.5%)**	**164 (46.5%)**	**353 (100%)**

Combined Safety & Safeguards Effort Factors Percent For FY 2020-2024



References

- 64 FR 31448; June 10, 1999.
- 85 FR 37250; June 19, 2020.
- 86 FR 32146; June 17, 2021.
- 87 FR 37197; June 22, 2022.
- 88 FR 39120; June 15, 2023.
- 89 FR 51789; June 20, 2024.
- FY 2020 - 2024 Final Fee Rule Work Papers.
- NRC Public Website Fee Rule:
  https://www.nrc.gov/about-nrc/regulatory/licensing/fees.html

Questions/Comments

Current Licensing Program Feedback and Recent Interactions

Kimyata Morgan-Butler, Deputy Director

Division of Fuel Management

Office of Nuclear Material Safety and Safeguards

Revising NUREG-1520

- Considering targeted update to NUREG-1520
- Contract funds in FY25
- New staff

Identified Areas for Revision to NUREG-1520

- Digital Instrumentation and Controls
- Facility Clearance Process
- Decommissioning Activities
- Areas of Additional Clarity
  - Electrical
  - Natural Phenomena Hazards
  - Integrated Safety Analysis
  - Management Measures

Early Lessons Learned with Major Amendments

We identified the importance of:

- Pre-application activities
- Draft RAI calls
- Audits or site visits
- Quality submittals
  - Avoid Request for Supplemental Information
  - Reduce level of NRC effort
- Quality information/responses to questions

Update on the Fuel Cycle Facility Inspection Program Self-Assessment

Benjamin Karmiol, Fuel Cycle Operations Engineer
Inspection and Oversight Branch
Division of Fuel Management

Progress

Public* Report:

- Issued on 10/30/24 (ML24242A102)
- Scope:
  - Assess fuel cycle facility inspection program
  - Assess changes implemented by the smarter inspection program (SIP)
- Results
  - Fuel cycle facility inspection program is meeting its goal of reasonable assurance of adequate protection
  - Areas of possible further enhancement were identified
  - Recommendations address these areas
  - Recommendations do not substantially impact frequencies/resource estimates as listed in IMC 2600 Appendix B
- Implementation
  - Recommendations have been prioritized and will be implemented based on a business case that considered return on investment
  - Recommendations will be considered in the context of the ADVANCE act, Section 507 response to congress

***Non-public report is in concurrence**

Update on ISA Considerations and Designations of IROFS for Natural Phenomena Initiated Events

James Downs, Acting Branch Chief
Jonathan Marcano, Senior Risk & Reliability Analyst
Division of Fuel Management

Update on ISA Considerations and Designations of IROFS for Natural Phenomena Initiated Events

- NRC staff does not require any particular engineered (e.g., building) or administrative control to be designated an IROFS independent of ISA results.
- Subpart H of 10 CFR Part 70 enables an applicant to employ a wide range of options to demonstrate reasonable assurance of adequate protection.
  - Facility-specific ISA determines IROFS per 10 CFR 70.61(e), and
  - Baseline design criteria (BDC) (70.64(a)(2)) for "new facilities and new processes at existing facilities" requires "adequate protection against natural phenomena with consideration of the most severe documented historical events for the site"
  - An applicant may use an appropriate building code to determine the NPH that need to be assessed in their ISA to demonstrate safety
- NUREG-1520 has one approach to meet the regulations. Following this approach aids in an efficient review. Other approaches may also be valid provided applicants demonstrate how that approach (which may consider the totality of the activities to meet the regulation) maintains reasonable assurance of adequate protection.

NRC and Industry Identified Topics for Further Discussion

1. What clarification can be provided on the facility-specific scope and results of the NRC's activities from Generic Letter 2015-01?
2. What is the burden (e.g., cost, level of inspection, required management measures, reporting) associated with designating a structure as an IROFS? Are there effective ways for the NRC to reduce that regulatory burden and maintain the level of safety?
3. Is it appropriate to identify a structure designated as an IROFS as a "sole IROFS" per 10 CFR 70.65(b)(8)? What defines "degraded" for a structure designated as an IROFS?
4. How and when can satisfying the baseline design criteria in 10 CFR 70.64 (e.g., building code compliance) be used as a basis for compliance with ISA requirements in lieu of more complex analysis for NPH (e.g., seismic fragility analyses)?

Public Participation

At this time, the public is afforded an opportunity to ask questions and/or provide comments on the following topics:

- Effort Factors
- Current Licensing Program Feedback and Recent Interactions
- Update on ISA Considerations and Designations of IROFS

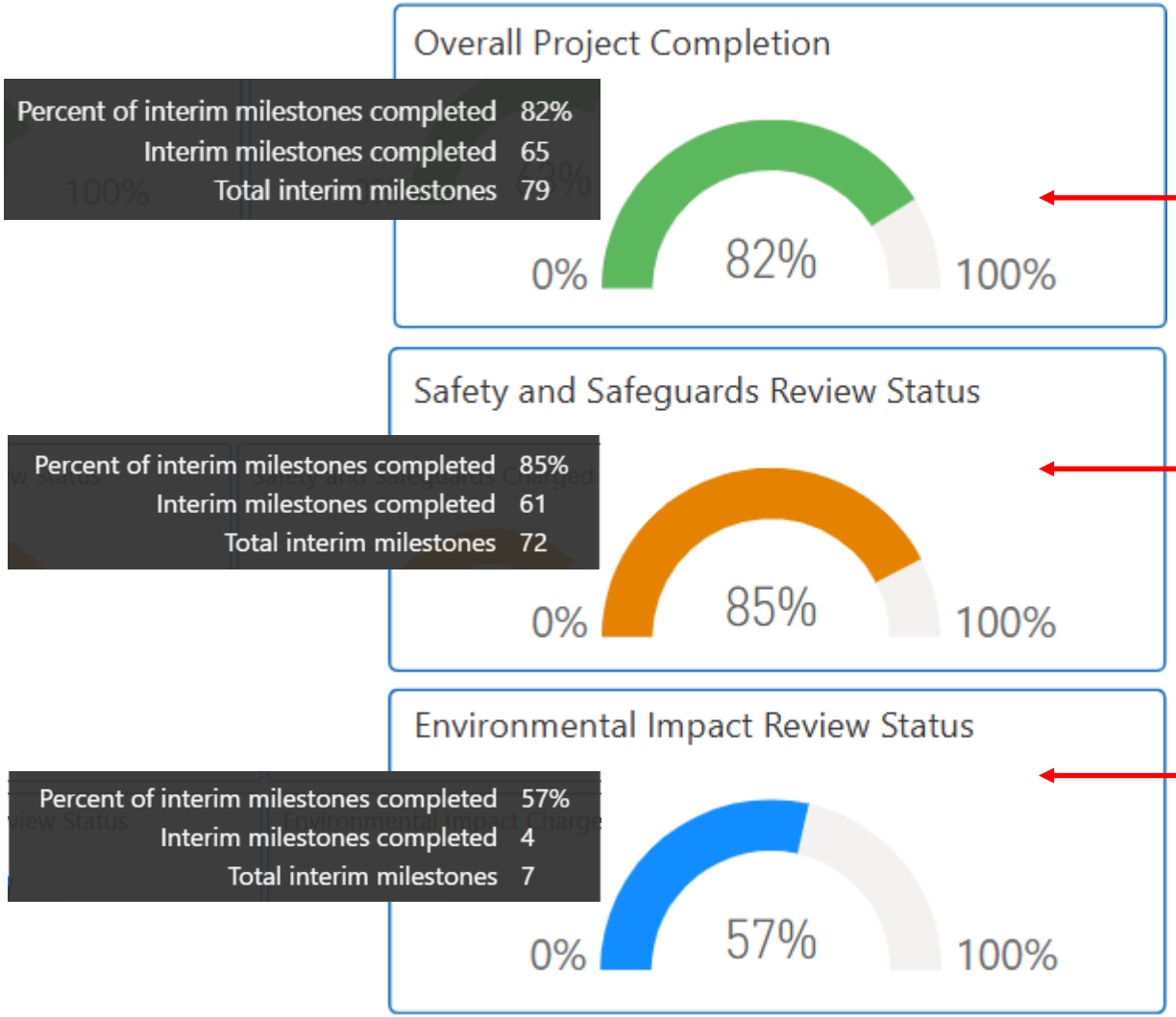
Feedback on Fuel Facility Public-Facing Dashboards

Matt Bartlett, Senior Project Manager
Fuel Facility Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards

Fuel Facility Public-Facing Dashboards

- Public-facing dashboards for all new license applications and major amendments
- Goals includes efficiency and accountability
- Designed for rapid deployment and easy to update
- Compliant with 21st Century Integrated Digital Experience Act

Developed a New Public Facing Dashboard (LES 10 wt.% Amendment)



Overall project milestones completed.

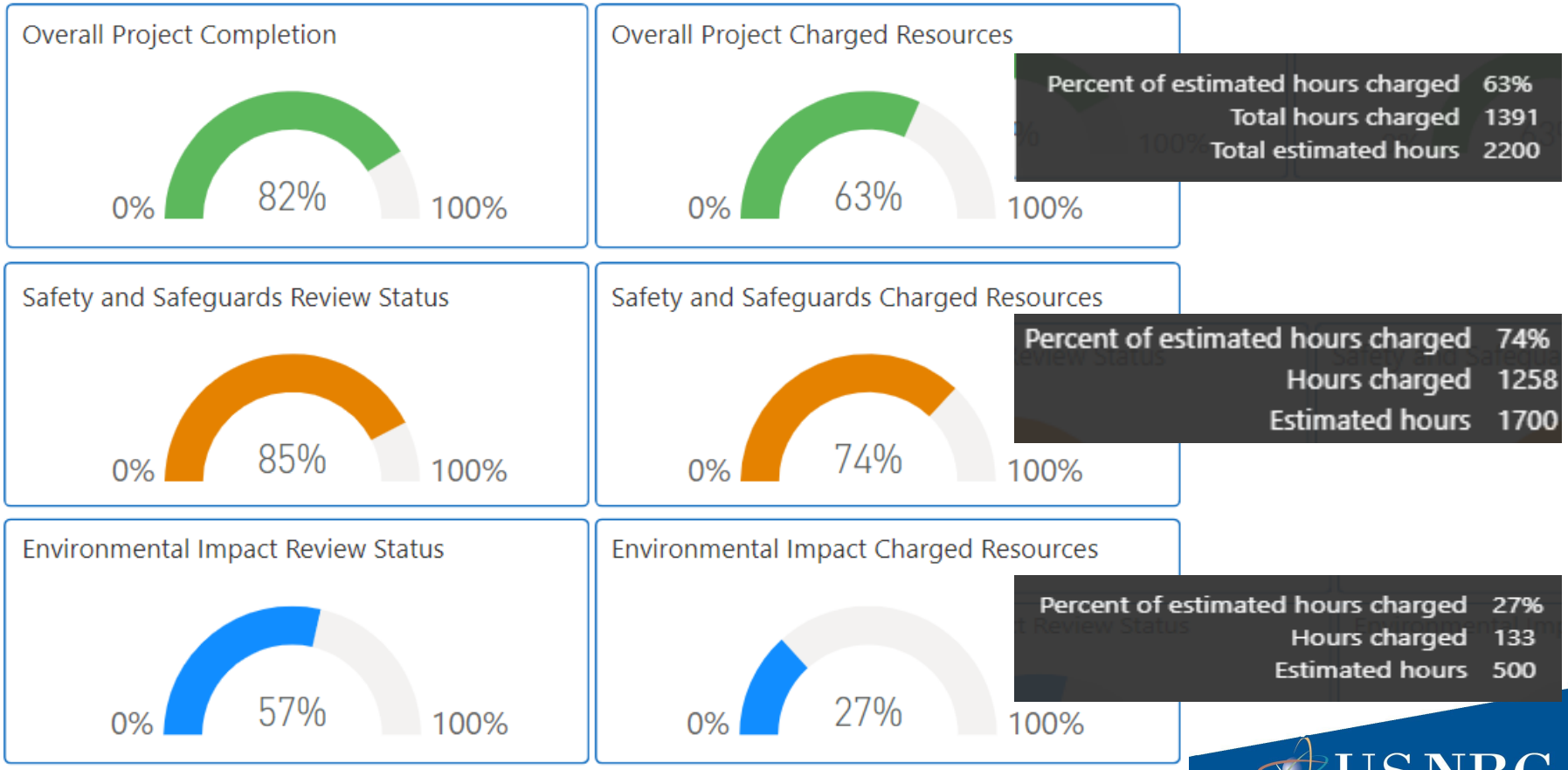
Safety and safeguards milestones completed.

Environmental assessment milestones completed.

https://www.nrc.gov/info-finder/fc/urenco-enrichment-fac-nm-lc/project-status.html

Piloted Update for LES Dashboard – 10 wt% Amendment

The current agreed upon schedule in the acceptance of the Louisiana Energy Services, LLC – license amendment request to raise the enrichment limit to less than 10 weight percent uranium-235 (ML24052A385) dated March 1, 2024, estimated 12 months review, including the acceptance review and approximately 2,200 hours of effort to complete.



Goals of the Piloted Dashboard Update

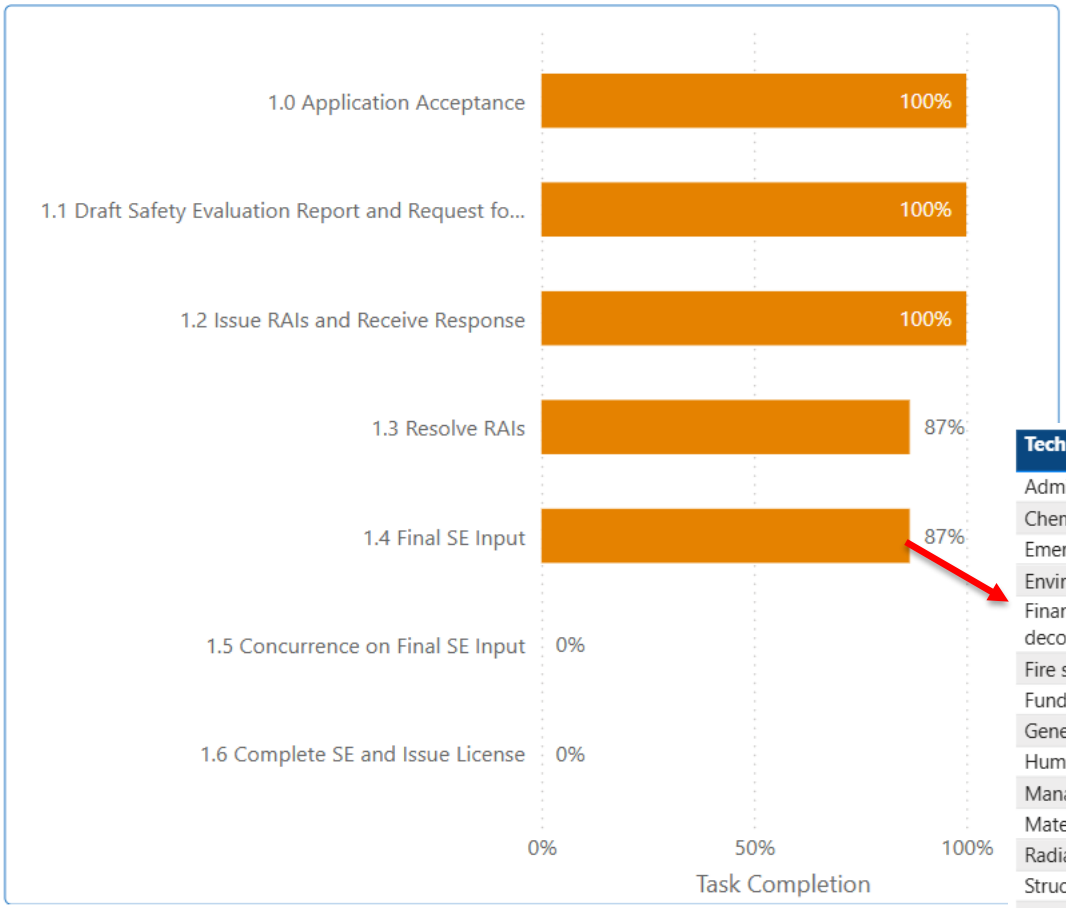
- Promote enhanced visibility and accountability for licensing reviews.
- Provide insights on the estimated vs expended resources.
- Allow comparison between the milestone and resources graphics.

49

Safety and Safeguards Status Tab

Project Status | Safety and Safeguards Status | Safety and Safeguards Schedule | Environmental Impact Status | Environmental Impact Schedule | HITI | Data Table (web)

Note: Hover over the chart data for more details



Project status is sub-divided into the major stages of the review

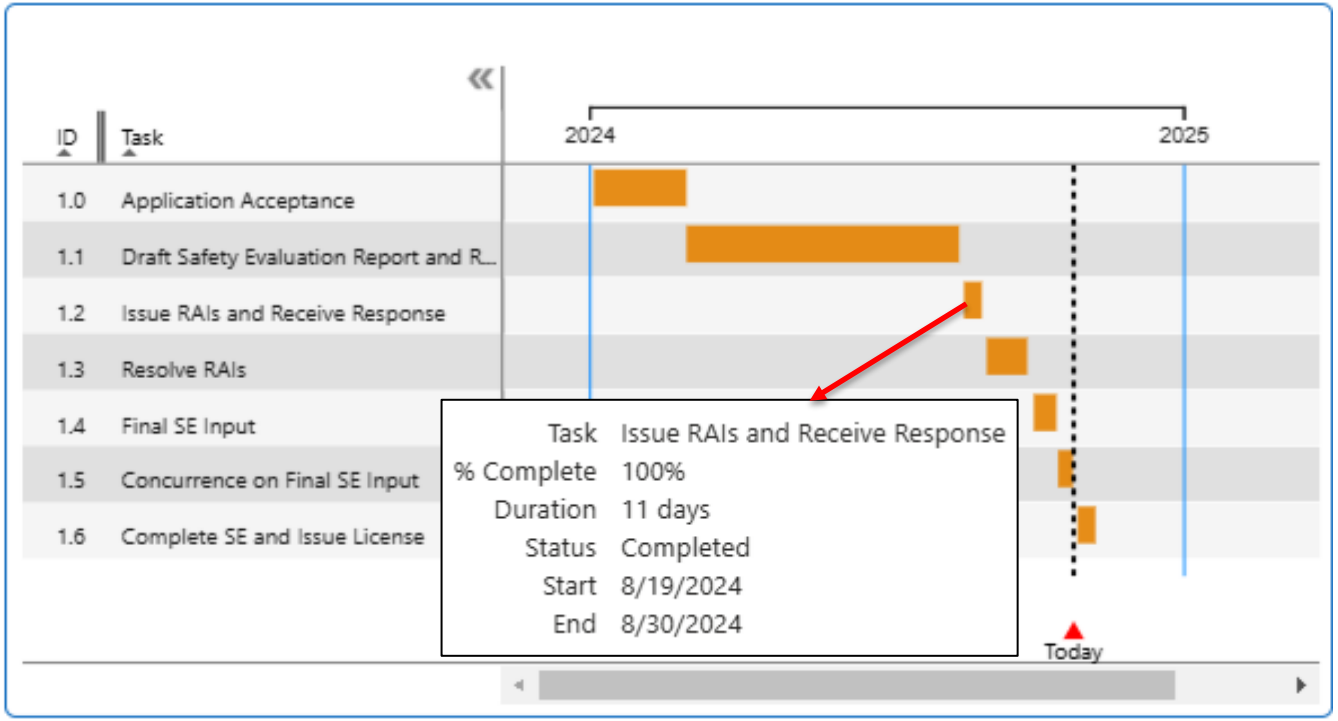
The Pop-up displays the status of the milestone

Technical Area	Status
Administration	Complete
Chemical safety	Complete
Emergency management	Complete
Environmental safety	Complete
Financial qualifications and decommissioning	Complete
Fire safety	Complete
Funding and financial insurance	Complete
General information and organization	Complete
Human factors	Complete
Management measure & quality assurance	Complete
Material control & accounting	Complete
Radiation protection	Complete
Structural and NPH	Complete
Criticality safety	Pending
ISA summary	Pending

13 out of 15 milestones completed for 87%

Safety and Safeguards Schedule Tab

Project Status | Safety and Safeguards Status | Safety and Safeguards Schedule | Environmental Impact Status | Environmental Impact Schedule | HITI | Data Table (web)



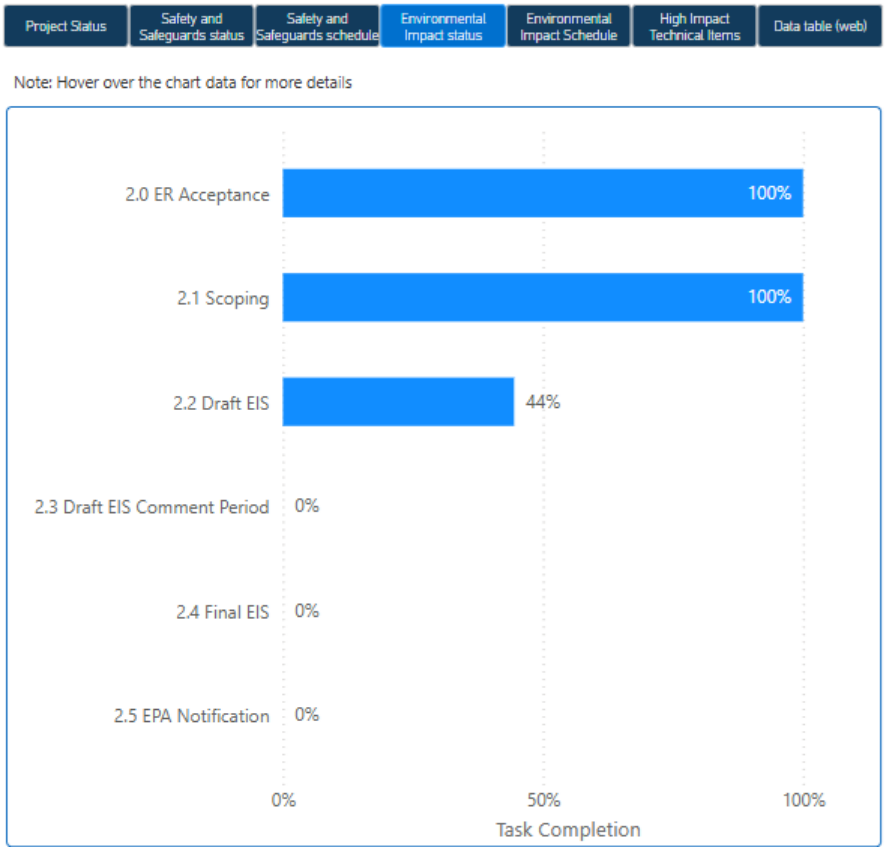
The Gantt chart indicates the projected timeline of the review based on the established schedule in the acceptance letter

ID	Start	End	Duration	% complete
1.0	1/4/2024	3/1/2024	57 days	100%
1.1	3/1/2024	8/16/2024	168 days	100%
1.2	8/19/2024	8/30/2024	11 days	100%
1.3	9/2/2024	9/27/2024	25 days	87%
1.4	10/1/2024	10/15/2024	14 days	87%
1.5	10/16/2024	10/25/2024	9 days	0%
1.6	10/28/2024	11/8/2024	11 days	0%

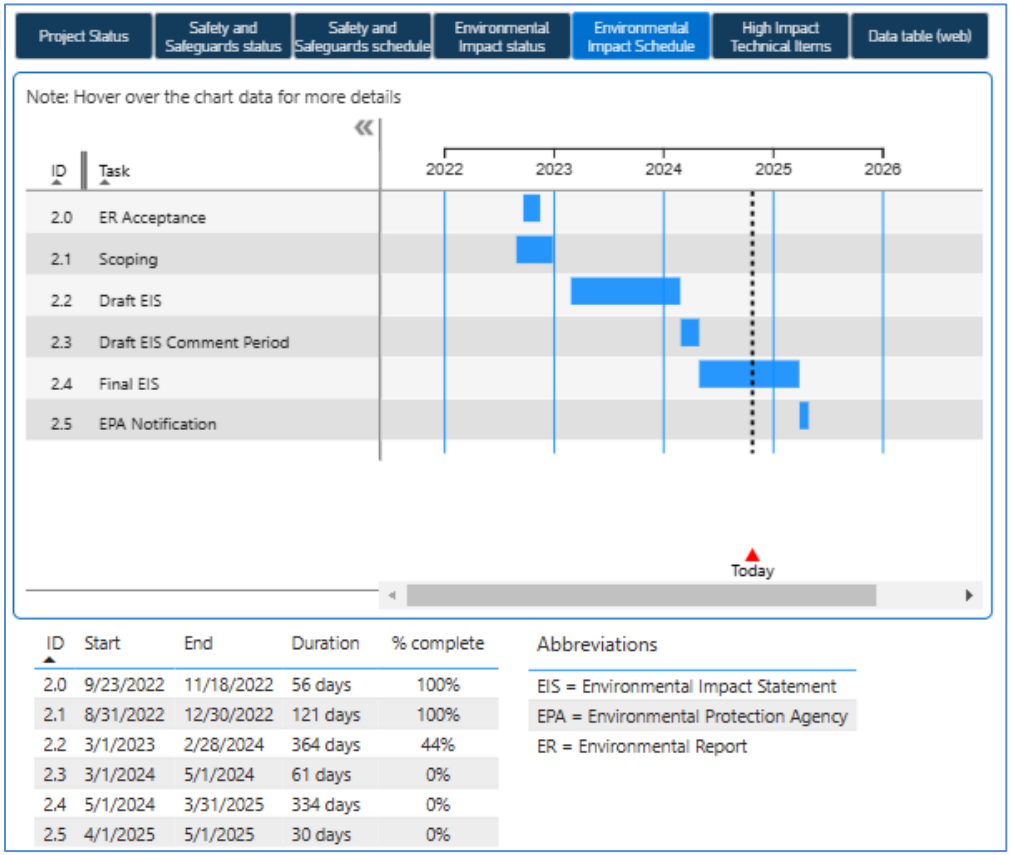
Abbreviations
ACRS = Advisory Committee on Reactor Safeguards
RAI = Request for Additional Information
SER = Safety Evaluation Report

Environmental Impact Dashboard (Tabs 4 and 5)

Environmental Impact Status



Environmental Impact Schedule



ID	Start	End	Duration	% complete
2.0	9/23/2022	11/18/2022	56 days	100%
2.1	8/31/2022	12/30/2022	121 days	100%
2.2	3/1/2023	2/28/2024	364 days	44%
2.3	3/1/2024	5/1/2024	61 days	0%
2.4	5/1/2024	3/31/2025	334 days	0%
2.5	4/1/2025	5/1/2025	30 days	0%

Abbreviations

EIS = Environmental Impact Statement
EPA = Environmental Protection Agency
ER = Environmental Report

High Impact Technical Items (HITI) Tab

ID	Items	Status
4.0	The XXX portion of the application had a delayed submittal. It is under NRC review.	NRC reviewing
4.1	Five requests for additional information on the criticality safety chapter needs to be resolved.	Awaiting Response

Total items: **Awaiting response:** **NRC reviewing:** **Resolved:**

The HITI tab tracks issues that are review/schedule risks.

Next Steps

- Receive feedback from stakeholders
- Evaluate if we should expand the pilot to other projects
- Evaluate if we should add additional visualizations to communicate the status of projects

Report on the Industry Regulatory and Inspection Summit (IRIS) and Applicability to Fuel Cycle Facilities

LaDonna Suggs, Director

Division of Fuels, Radiation Safety, and Security

Region II

Introduction – Background and Motivation

Public Meeting on NRC and Industry Collaboration

Staffing Challenges

High turnover in the NRC and industry has reduced inspection experience.

Impact of COVID-19

Remote inspections during the pandemic disrupted hands-on training.

Strengthening Collaboration

The summit aimed to improve mutual understanding between NRC inspectors and licensees.

Purpose and Guidelines for the Summit

Fostering Collaboration without Criticism

Collaborative Learning

Aimed to align expectations without placing blame.

Avoidance of Case Studies

Discussions focused on broad lessons, rather than individual incidents.

Scripted Topics

Predefined topics ensured balanced discussions and thorough preparation.

RFI Lifecycle & Managing Disagreements During Inspections

Ensuring Effective and Smooth Coordination

Streamlined RFI Process

Early Submission of RFIs (90 days) reduces inspection delays.

Proactive Handling of Disagreements

Licensees are encouraged to raise concerns early to prevent escalation.

Backfitting Concerns

NRC resolves disputes with technical and legal reviews to avoid unnecessary backfitting.

Team Coordination and Leadership Involvement

Ensuring Smooth Execution of Inspections

Point of Contact

Direct coordination between licensee representatives and inspectors.

Daily Briefings

Teams debrief to maintain alignment and resolve issues in real-time.

Leadership's Role

Senior leadership monitors progress to address challenges early.

Inspection Outcomes and Best Practices for Stakeholders

Aligning on Performance and Documentation

Non-Cited Violations (NCVs)

Minor violations do not warrant formal citations.

Notices of Violation (NOVs)

Formal notifications for serious findings.

Resolution of Unresolved Items (URIs)

Timely resolution prevents administrative burdens.

Key Takeaways for Fuel Facility Licensees

Applying IRIS Lessons

Clear Communication

Early engagement with NRC inspectors ensures smoother inspections.

Proactive Resolution

Addressing potential issues early minimizes delays and open items.

Adaptation of Best Practices

Fuel facilities can benefit from lessons learned in reactor inspections.

Conclusion – Next Steps and Future Opportunities

Aligning on Continuous Improvement

Tailored Summit for Fuel Facilities

Consider a similar summit for Fuel Facility Stakeholders.

Enhanced Collaboration

Build stronger relationships between NRC and Licensees.

Commitment to Continuous Learning

Focus on learning and adapting best practices.

Public Participation

At this time, the public is afforded an opportunity to ask questions and/or provide comments on the following topics:

- Feedback on Dashboard Pilots
- Report on the Industry Regulatory and Inspection Summit and Applicability to Fuel Cycle Facilities

Recap of Action Items

Jonathan Rowley, Project Manager
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards

Closing Remarks

Shana Helton, Director

Division of Fuel Management

Office of Nuclear Material Safety and Safeguards

Greg Core, Director

Fuel Cycle Facilities

Nuclear Energy Institute