

# VLSSIR Process Revision



ROP Public Meeting  
March 26, 2025

# Purpose of Discussion

Provide information on the next revision of VLSSIR

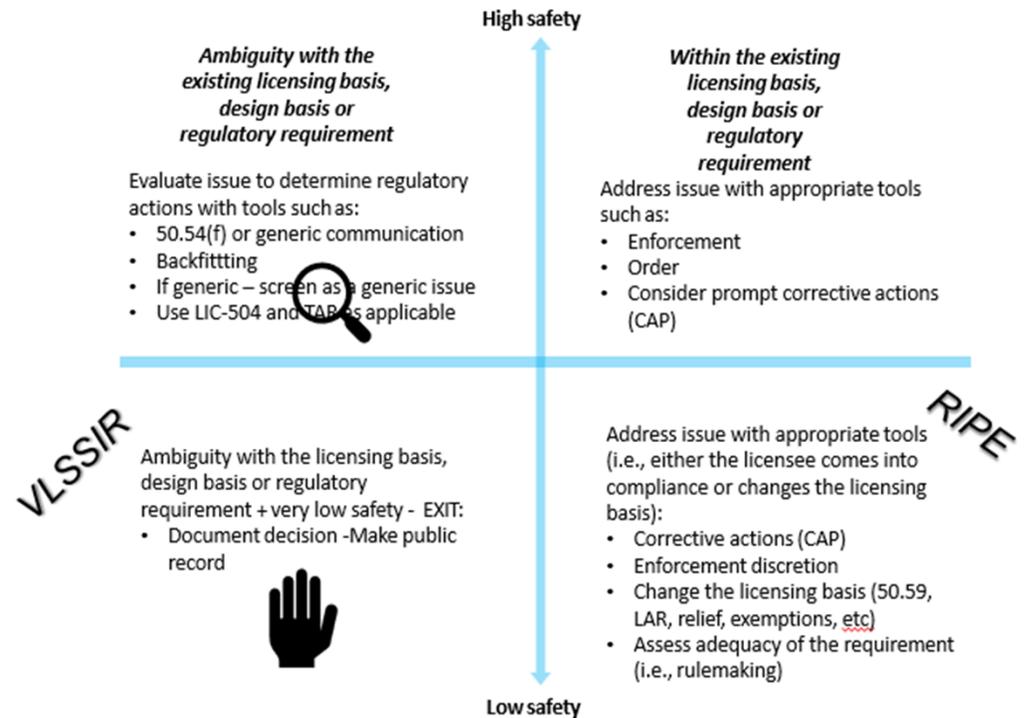
Provide an opportunity for questions and comments

# VLSSIR Refresher

## Current Definition:

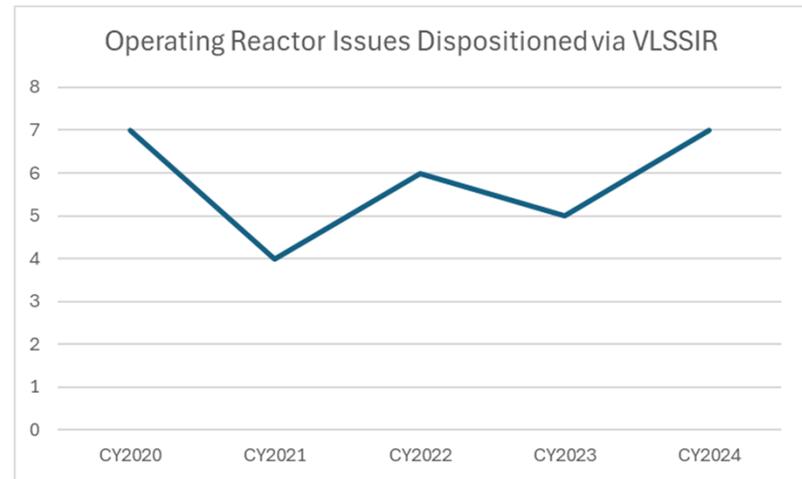
A process used to discontinue inspection of an issue involving an unresolved **licensing basis question** in which:

- (1) the resolution of the issue would **require considerable staff effort**; and
- (2) the agency has chosen to not expend further effort to resolve the question because the issue would be **no greater than green** under the ROP or **SL IV** under the traditional enforcement process, if it were determined to be a violation.



# VLSSIR Refresher

- 2021 effectiveness review of VLSSIR
  - the VLSSIR process has helped reduce the number of open or unresolved items that the NRC is tracking
  - the process has provided a predictable framework
  - the VLSSIR process is working as intended



2019	2022	2023	2025
Initial rollout of VLSSIR for operating reactor licensing basis issues  Revised TAR process also rolled out	Revised to cover traditional enforcement items	Revised to apply to NMSS licensees and issues	Being revised to cover ambiguity in licensing basis, design basis, and regulatory requirements

- What VLSSIR is Not:
  - Not used to disposition issues with potential to be greater than Green or more than SL-IV
  - Not a process intended to reduce or eliminate Green findings/violations or more than SL-IV violations
  - Not used to resolve NRC-licensee disagreement absent ambiguity in the NRC's understanding of the issue
    - Appeals and contesting violations still the appropriate avenue
  - Not used to address issues known to be within the licensing or design basis or known to not meet requirements or applicable standards

# What is Changing with VLSSIR

- Primary purpose of VLSSIR Remains the Same
  - Address questions or issues involving ambiguity
  - Focused only on issues that would be no greater than Green or SL-IV
  - Resources necessary to disposition are not within the agency's interests
  - Still one of several tools for dispositioning issues
  - Exclusively an Agency internal decision whether to use
- Applicability is Being Revised
  - Now includes issues involving design basis or regulatory requirements in which there is ambiguity
  - More guidance and consideration of resource expenditure, seeking to be consistent with IMC 2515 guidance on HQ support
- Bottom Line: Part of Agency-Wide initiatives to reduce effort on very low safety or security significance issues

# Proposed Guidance Updates

- Operating Reactors:
  - Revised definition and new VLSSIR background discussion in IMC 0612
  - Updated screening instructions in IMC 0612 Appendix B
    - VLSSIR should be considered throughout the inspection and dispositioning process
    - Additional resource considerations and touchpoints for review of whether to continue, drop, or VLSSIR open items
  - Updated documentation template in IMC 0611
- Corresponding revisions will be incorporated into materials program
- Anticipate revised IMCs to be issued later this spring and will take effect upon issuance

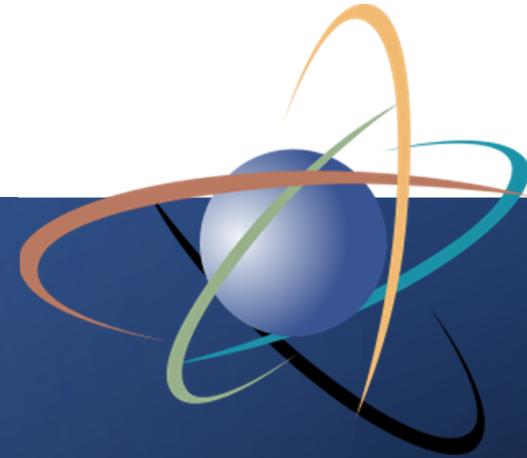
# High Level Overview

Goal: Don't get stuck on very low safety/security significance issues - disposition and move on

Planned Direct Inspection Activities (on-site or virtual)	Time to Exit	Document Results and Issue Report
<p>Inspection Q&amp;A</p> <p>Most/all issues dispositioned or path to dispositioning is clear</p> <p>Inspector and BC awareness of issues involving ambiguity and whether to continue, stop, or VLSSIR</p>		<p>For issues not yet dispositioned:</p> <ul style="list-style-type: none"> <li>• Periodic review to determine whether resources to resolve are in Agency's interests: continue, stop, or VLSSIR</li> </ul>

Consider VLSSIR When:

- Issue involves ambiguity and may not be quickly resolved
- Additional resources to resolve may not be in the Agency's interests



# Questions and Comments