



Prioritization of ADVANCE Act Potential Improvements

MAY 14, 2025

Prioritizing ADVANCE Act Improvements

INPUT FROM THE INDUSTRY

- NRC provided an extensive list of potential improvements from multiple sources in an April 10, 2025 public meeting
- NRC requested industry provide their priorities at the upcoming Stakeholder's meeting
- “Near-term” improvements were not considered since they are already being implemented
- Two top-five lists created for mid- and long-term items

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INPUT FROM THE INDUSTRY (2)

- Considering the timeframe of implementation
 - **Mid-term items:** implementation to begin immediately
 - **Long-term items:** barring rulemaking, SRP revision, or other process outside of the NMSS's control, implemented within the next six months

Top Five Mid-Term Improvement Priorities

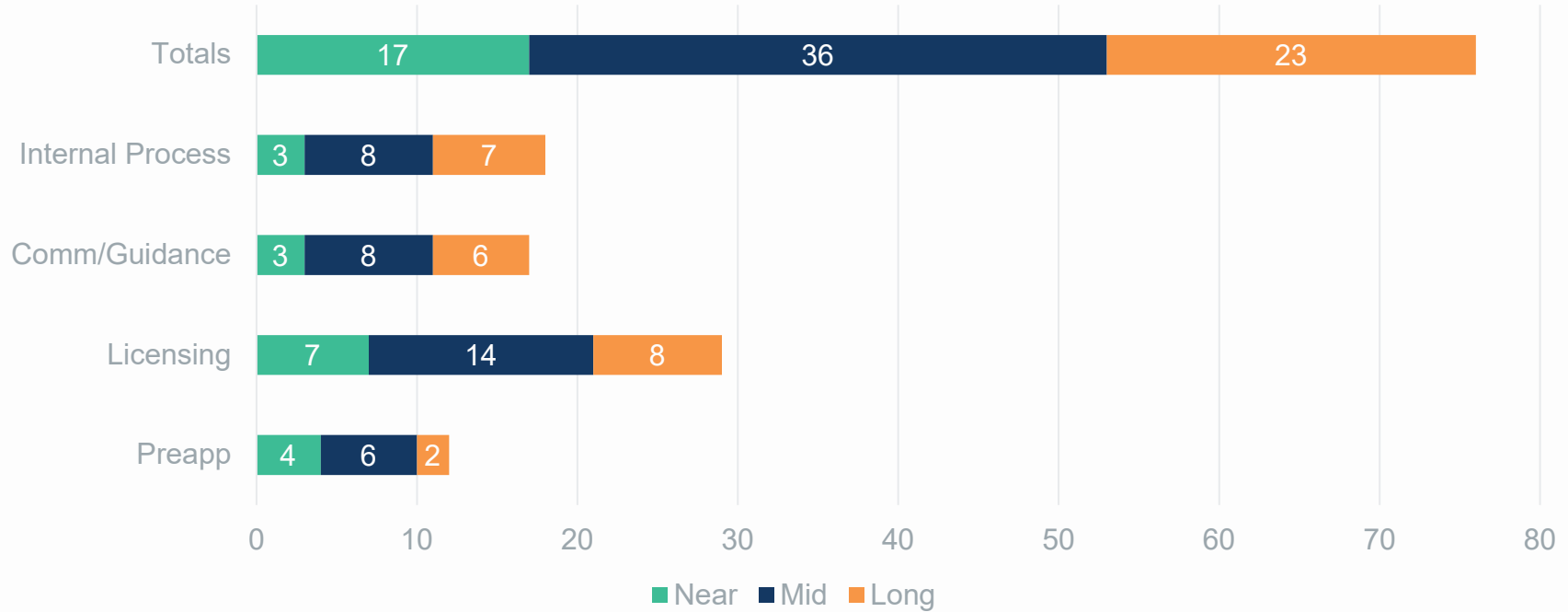
1. NRC management must hold NRC staff accountable for the *acceptance* and technical reviews including the depth, breadth, & scope of the review and the regulatory basis of safety findings.
2. Direct the NRC staff to review precedents/methodologies applied to existing fuel cycle facility licensees and similar technical submissions. Potential benefits include better: avoiding unnecessary duplication of review effort by NRC staff; allowing consideration of prior conclusions from previous application reviews; and narrowing the focus of the review activity to what is different and unique in the new application.
3. Use Categorical Exclusions from 10 CFR 51.22 more frequently and consistently, instead of a simple Environmental Assessment (EA).
4. NRC should conduct its reviews to ensure they are timely/efficient and the duration of the review should correlate to the associated risks of the technology.
5. Set more ambitious targets for reviews – i.e., most LARs (180 days) and all LARs (365 days)

Top Five Long-Term Improvement Priorities

1. Develop guidance endorsing commercial building codes for fuel facilities – including the conditions under which the code can be used.
2. Issue "term-free" licenses, which would eliminate the need for the review of license renewals
3. Streamline or *lean* safety evaluation reports – use templates, checklists, bullets, embedded links
4. Ensure internal agency alignment on key technical and policy issues – NUREG-1520 uses terminology like "provide sufficient detail" which is subject to interpretation and does not clearly define expectations. Current NRC positions on technical issues related to facilities should closely align with previous historical reviews of similar types of facilities as much as practicable.
5. Utilize core teams (i.e., pool of reviewers led by a subject matter expert, a representative branch chief, and Senior Executive Service champion) to facilitate more efficient reviews and incorporate lessons learned from one review to the next

Note: Implementing processes such as VLSSIR & RIPE-M to licensing actions was also considered important, but this should have already been implemented based on pre-ADVANCE Act initiatives

Distribution of ADVANCE Act Potential Improvements from April 10 Public Meeting



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MOVING FORWARD

- 53 of 76 items could immediately begin implementation
- We are interested in understanding the NRC's next steps for providing durable, measurable implementation of selected items
- We look forward to coordinating with the NRC on these efforts to help realize the spirit of the ADVANCE Act