

NEI 03-08 Industry Materials Initiative

Appendix C Screening Process



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NEI 03-08 Document Screening Process

Why Was It Developed?

- Developed with the intention of reducing resources needs associated with reviews of changes to NEI 03-08 mandatory or needed guidance developed by industry issue programs (IPs) where there is limited or no potential for a significant adverse impact on safe operation
- Process provides for implementation of revisions to NEI 03-08 mandatory or needed guidance without NRC review and approval
- Added to NEI 03-08 in 2017 (Appendix C)

Objective = Efficient Use of Resources for Low Risk Revisions

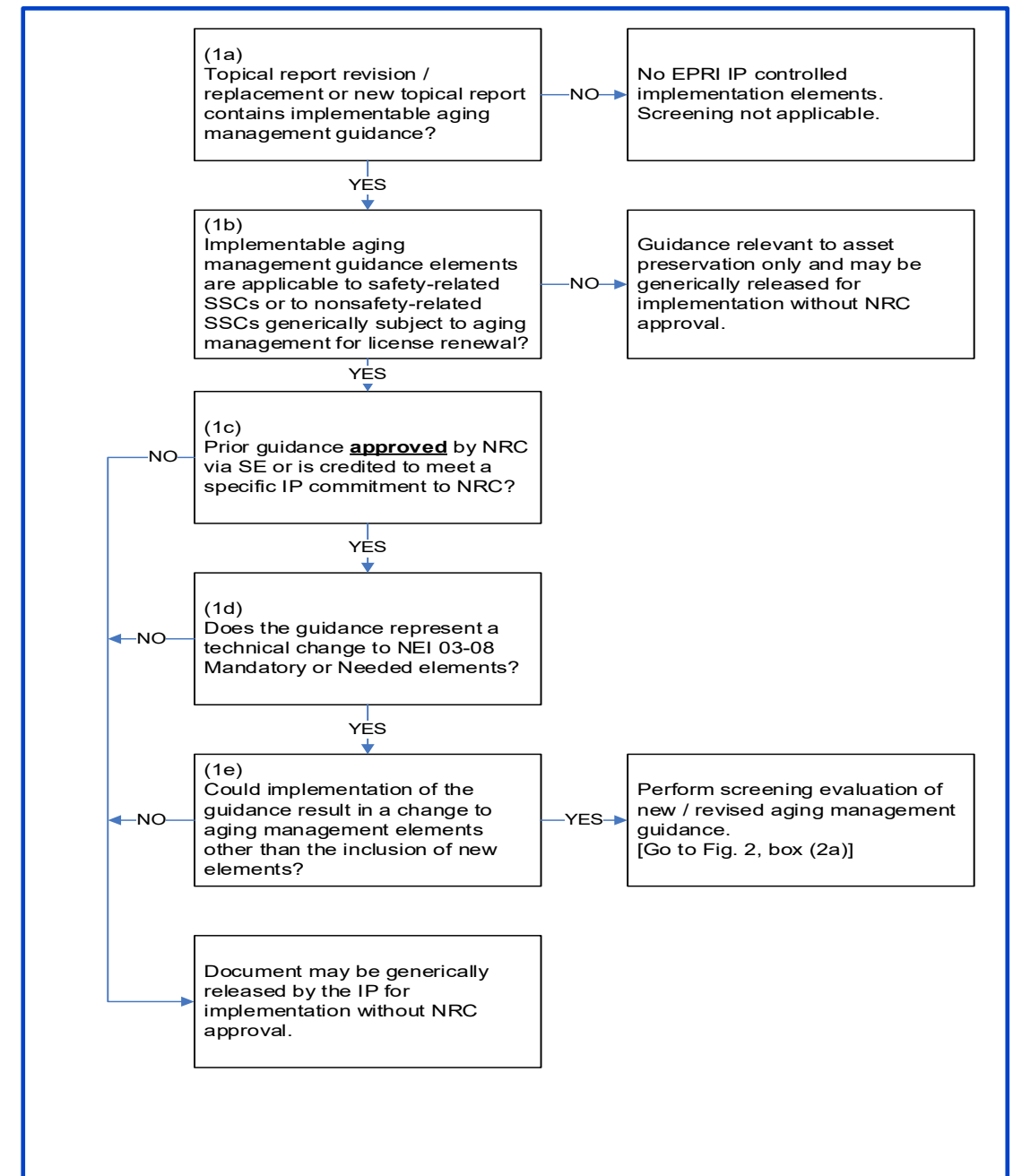
NEI 03-08 Document Screening Process

What Is It?

- Applied to all new and revised guidance documents containing NEI 03-08 mandatory or needed elements
 - Process not relevant to reports that do not contain aging management guidance (e.g., reports documenting results of R&D)
- Includes two steps
 - Applicability Evaluation
(Determine if screening process use is applicable to the proposed guidance revision)
 - Screening Evaluation
(Assess need for review and approval based on risk significance / regulatory precedent)
- The process IS intended to permit changes that are non-editorial in nature but for which there is limited or no potential for an adverse impact on safe operation

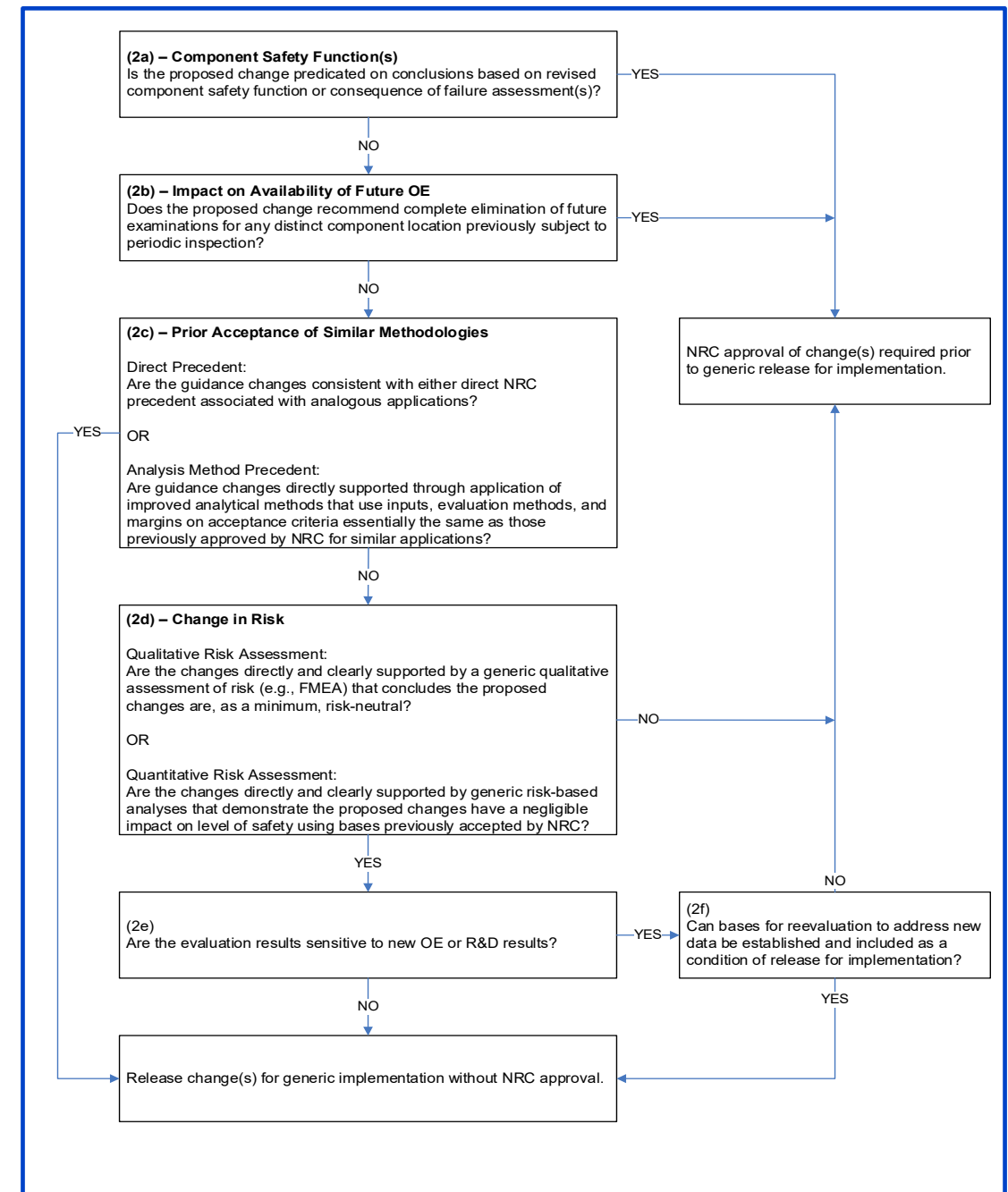
Applicability Evaluation

- Used to determine when further document screening is applicable
- Screening (next step) is required unless:
 - Changes are entirely editorial and do not impact mandatory or needed guidance
 - Changes to mandatory or needed guidance are solely the addition of new requirements
 - Guidance document is not directly related to aging management (e.g., repair guidelines)



Screening Evaluation

- Permits implementation of guidance revisions without prior review and approval for:
 - Revisions consistent with NRC precedent / prior NRC approval
 - Determinations based on a qualitative evaluation using methods consistent with those previously approved by NRC
 - Determinations based on quantitative risk-based analysis with results meeting criteria accepted by NRC



Limitations on Use

- Two general limitations on use are imposed as reasonable constraints to ensure appropriate and conservative application of document screening
 - 1) Cannot be used to screen out changes based on new or revised component safety assessments or consequence of failure assessments
 - Ensures that IPs do not eliminate examinations for components previously designated as important to safety in an NRC-approved safety assessment (e.g., BWRVIP-06) and for which aging management was required
 - 2) The impact on generation of OE appropriate to identify adverse performance trends must be considered
 - Ensures that changes to aging management guidance are not made that eliminate periodic generation of relevant field inspection data and preclude identification of adverse trends

Screening Documentation

- The introduction section of all reports containing NEI 03-08 mandatory or needed guidance should state the implementation status
- Where an applicability evaluation (simple evaluation) was used, the introduction section notes this conclusion. The details of the evaluation are documented in the IP project records.
- Where a detailed evaluation was used to screen out the topical report, the introduction section of the guidance document should provide a reference to the screening evaluation details
 - Ensures that program owners implementing the report guidance can access the screening evaluation details if desired
 - The evaluation itself may be documented either as an appendix to the topical report or in retrievable IP correspondence

Communication

- During development of the screening process, comments were solicited from both industry and NRC
- Screening process includes explicit requirements for communication of its use to NRC
 - Each NEI 03-08 IP provides an annual “information only” notification to NRC regarding application of the screening process
 - The level of detail provided is left to the discretion of each IP
 - As a minimum, the notification must include:
 - A listing of reports previously approved by NRC via SE that have been revised or replaced using document screening
 - Summary statement regarding the screening basis used
- Informal communication presumed to continue
 - It is expected that all NEI 03-08 IPs will continue to communicate with NRC in a transparent manner regarding application of document screening

Recent Changes in Communication Practice

- In an effort to make the details of screening evaluations more accessible to NRC for the purpose of reviewing licensee submittals that reference screened reports, EPRI IPs are now providing the entire screening evaluation, along with a summary of revisions made to the guidance document, in the annual notification letter
 - By letter dated May 6, 2025, the BWRVIP transmitted screening evaluation details for all guidance documents screened thru December 2023 (*BWRVIP-48 Rev. 1, BWRVIP-48 Rev. 2, BWRVIP-49 Rev. 1, BWRVIP-84 Rev. 3, BWRVIP-57 Rev. 1, BWRVIP-62 Rev. 2, BWRVIP-84 Rev. 3, and BWRVIP-303*)
 - By letter dated May 7, 2025, the BWRVIP transmitted screening evaluation details for all guidance documents screened in 2024 (*BWRVIP-38, Rev. 1*)

Observations on Screening Process Use to Date

- Due to the nature of IP guidance document structures, the BWRVIP is the only EPRI IP to use the screening process to date
- Documents issued for implementation based on screening generally fall into one of three groups
 - Adjustments of inspection programs or evaluation requirements to reflect the current state of knowledge (e.g., BWRVIP-48 Rev. 2, BWRVIP-38 Rev. 1)
 - Updates to content to be consistent with current practice and the intent of NRC safety evaluations (e.g., BWRVIP-62 Rev. 2)
 - Revisions to documents that are not related to aging management e.g., BWRVIP-57 Rev. 1
- In cases where the revisions do not clearly meet the requirements for screening as outlined in NEI 03-08 Appendix C, these reports **HAVE** been submitted for review and approval

Examples of Guidance Documents Not Passing Screening

- In several instances, it was determined that use of the screening process was not appropriate and reports were submitted to NRC for review and approval:
 - MRP-227 Rev. 2, PWR Internals Inspection and Evaluation Guidelines (EPRI 3002020105)
 - BWRVIP-100 Rev. 2, Updated Assessment of the Fracture Toughness of Irradiated Stainless Steel for BWR Internal Components (EPRI 3002023756)
 - BWRVIP-138 Rev. 2, BWR Jet Pump Beam Inspection and Evaluation Guideline (EPRI 3002023754)

Future Plans

- Industry intends to continue to use the screening process as appropriate for revisions of aging management guidance
- Screening will be used in a conservative manner – only applied where there is a strong basis for acceptable screening
- It is anticipated that requests for review and approval using the topical report evaluation process will continue since it is known that for some planned future revisions to guidance, the screening criteria likely cannot be met

Conclusions

- The NEI 03-08 document screening process was developed to promote efficient use of industry and NRC resources associated with changes to guidance
- Use of this process to date has focused on changes that are consistent with prior precedents and/or for which there are robust technical bases
- In a number of cases, consistent with its commitment to NEI 03-08, EPRI IPs have determined that guidance document revisions cannot be implemented using the screening process and have been submitted to NRC for review and approval
- EPRI remains open to continuing dialogue with NRC regarding use of the screening process, details of guidance revisions, and supporting technical bases



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