

## Regulatory Response Plan Nuclear Steam Supply System (NSSS) Owners Groups

### **Introduction**

A Regulatory Response Plan (RRP) is a structured approach for providing to the NRC an assessment of a reactor event or finding from an industry-sponsored design analysis, or research and development efforts that could have safety significance. An initial assessment by an NSSS Owners Group may provide NRC a basis for near-term regulatory action, or the basis for no regulatory action.

Each NSSS Owner's Group will designate a RRP Point of Contact and a team to implement the RRP. Each Owner's Group will notify their respective NRC project manager and their respective utility members of the RRP Point of Contact.

Utility personnel experienced in either plant operations, licensing, design analysis or risk assessment will form the team to implement the RRP. A NSSS vendor representative, well versed in plant operations, may be included in the team as well as representatives from INPO, EPRI, and NEI.

### **Activation Criteria for Regulatory Response Plan**

The NSSS Owners Group (Chairman or the RRP Point of Contact) will consider activation of the Regulatory Response Plan when a reactor event or new analysis indicates there may be a potential near-term safety significant issue relating to:

1. Radiological Barriers
2. Emergency Core Cooling
3. Safe Shutdown

Activation of the RRP may not be appropriate for cases where:

1. the NRC concern does not have generic applicability to the specific Owners Group, or
2. the NRC concern places the Owners Group plant(s) outside previously analyzed conditions, but the licensee(s) can maintain the plant(s) within regulatory limits using acceptable controls.

Authority to activate the RRP resides with the NSSS Owners Group (Chairman or the RRP Point of Contact) and all requests for activation should go through that designated individual.

Typically, requests come from the following sources:

1. The Director, Office of Nuclear Reactor Regulation (or designated representative of the NRR Executive Team)
2. An operating utility
3. An engineering design or analysis organization

### **Regulatory Response Plan Attributes**

The NSSS Owners Group Point of Contact will propose a date to present a preliminary assessment to NRR. The initial presentation should take place within ten working days or as mutually agreed upon.

The NRC will specify the methods for which the above information will be submitted. Acceptable methods include electronic or hard copy submittals followed by a meeting with NRC or a teleconference.

The NSSS Owners Group Point of Contact will notify affected utilities of the activation of the RRP.

The presentation to the NRC will include:

- An analysis of the safety and/or risk significance.
- The scope of the issue as it relates to the Owners Group and if the concern has generic implications for the industry.
- A schedule and prioritization for remedial actions to be undertaken by the NSSS Owners group to address the issue. An assignment of responsible parties for each action, (e.g., Owners Group, NSSS vendor.)

The NRC concern and the assessment along with the schedule for remedial actions will be distributed to each affected Owners Group member utilities.

The NSSS Owner's Group Chairman or designated Point of Contact can deactivate the regulatory response plan when the above actions are completed or the issue is assigned to an existing subcommittee or subgroup of members for final disposition/resolution.