Introduction to RIRP Flow Chart
+ Endnotes

The RIRP is a protocol[1] for managing the timely[2] evaluation and closure[3] of regulatory issues that have generic applicability. Issues within the scope of the RIRP apply to a material number of plants and warrant further evaluation to determine the optimum resolution.

The RIRP is not a new regulatory process. It is a framework for using existing processes to identify priority issues, develop concise problem statements,[4] prepare evaluation and closure plans, and document closure with a reasonable degree of finality[5].

Maintaining nuclear safety as the highest priority is inherent in the RIRP. The objectives of the RIRP are:

- Establish underlying regulatory requirements
- Ensure compliance with applicable regulations
- Ensure consistent application of regulatory processes
- Ensure an "adequate protection" resolution that can be applied in a manner consistent with each plant's licensing basis
- Enable timely resolution of regulatory issues that have generic applicability
- Establish durability[6]

The attributes of issue resolution under the RIRP are:

- Confirmation of the issue's regulatory baseline[7] and technical baseline[8]
- Determination of the scope of applicability[9] of each issue, i.e., the organizations that would be subject to the results of an evaluation.
- Systematic framework for using project management techniques[10]
- Tracking and treatment of new issues that emerge during the evaluation phase
- Revised industry and NRC documents as part of the overall resolution of the issue.
- Clear and consistent communication to all affected parties
- Promote industry-wide implementation

The RIRP has four phases, which are depicted in the attached flow chart:

1. **Identification** – An individual or group identifies an issue that has generic applicability and recommends that the LATF screen it in accordance with the RIRP.
2. **Screening** – The LATF screens the issue against RIRP screening criteria.[11] If the issue screens in, the LATF gives it a priority ranking[12] and places it in the evaluation queue.[13]
3. **Evaluation** – When an issue reaches the top of the queue, the LATF forms an *RIRP issue team*[14] work with an independent NRC team to:
    a. Draft a Problem Statement,
    b. Determine the scope of applicability of the issue,
    c. Determine the regulatory baseline and the technical baseline for evaluating the issue,
    d. Define Success Criteria,[15]
    e. Prepare an Evaluation Plan,[16]
    f. Conduct the evaluation,
    g. Publish the results, and
    h. Prepare a Closure Plan.[17]
4. **Implementation** – Organizations within the scope of applicability implement the Closure Plan, including documentation.

[1] PROTOCOL

- An administrative methodology for inter-organizational coordination and communications.

[2] TIMELY

- Industry-wide resolution is more "timely" than case-by-case resolution.

[3] CLOSURE

- A definitive statement of all actions necessary and sufficient to close the issue. Each affected organization may need to adjust the closure plan to accommodate plant-specific variables.

[4] PROBLEM STATEMENT

- A definitive statement of the situation or circumstances that gave rise to the regulatory issue. It should convey to a knowledgeable reader the nature and extent of a potential deficiency.
- The industry RIRP Team and the counterpart NRC team independently prepare draft Problem Statements for agreement.

[5] REASONABLE FINALITY

- The resolution of an issue should be final unless new information or interpretations warrant reconsidering the issue when a potential impact on nuclear safety is identified.

[6] DURABILITY

- The durability of an issue resolution depends on the way it is documented. If it resides in a document subject to a change control process (such as a regulation, license, Regulatory Guide, Standard Review Plan, or updated FSAR) it is more durable than if it resides in a document that is not subject to change controls (such as a Regulatory Issue Summary, Information Notice, Inspection Manual, FAQs, guidance memoranda).

[7] REGULATORY BASELINE

- The regulatory requirements established in the Code of Federal Regulations, Orders, and the Operating License.
- The plant-specific licensing basis.
- The regulatory guidance that a non-licensee is expected to satisfy in order to conform to NRC staff expectations, for example, vendors that submit Topical Reports.
- Official NRC interpretations by the Office of the General Counsel.
- Precedent-setting regulatory decisions.
- *[additional documents?]*

[8] TECHNICAL BASELINE

- Standards and guidance documents that are incorporated by reference into the CFR, or cited by another NRC guidance document as an acceptable way to meet NRC expectations.
- Plant-specific PRA.
- *[additional documents?]*

[9] SCOPE OF APPLICABILITY

- The licensees and other organizations subject to the results of an evaluation are identified early in the Evaluation Phase.
- These organizations are notified and given the opportunity to comment.

[10] PROJECT MANAGEMENT TECHNIQUES

- Problem statement
- Scope of the issue
- Technical resource needs
- Success criteria
- Milestones
- Stakeholder involvement
- Etc.

[11] SCREENING CRITERIA

- The set of characteristics that are used to determine if an issue warrants evaluation under the RIRP.

[12] PRIORITY RANKING

- A range of values is assigned to each screening criterion.
- The priority of an issue is the sum of the screening values.
- If the priority exceeds a threshold value, the issue is eligible for evaluation and is entered in the evaluation queue.

[13] EVALUATION QUEUE

- The evaluation queue is a set of screened issues listed in priority order.

[14] RIRP ISSUE TEAM

- The LATF Steering Group will coordinate with industry organizations to identify groups of industry regulatory and technical specialists assigned to each issue-resolution team.

[15] SUCCESS CRITERIA

- The success criteria describe the attributes necessary to achieve closure of the issue.
- The industry RIRP Team and the counterpart NRC team independently prepare draft success criteria for agreement.

[16] EVALUATION PLAN

- The final Evaluation Plan describes the activities (e.g., surveys, analyses, reports tests, etc.) necessary to define closure of the issue.
- The industry RIRP Team and the counterpart NRC team independently prepare draft Evaluation Plans for agreement.

[17] CLOSURE PLAN

- The Closure Plan identifies the implementation and documentation options available to organizations within the issue's scope of applicability.
- The industry RIRP Team and the counterpart NRC team independently prepare draft Closure Plans for agreement.