

**NEI 09-XX**

# **Regulatory Issue Resolution Protocol**

*A Methodology for Resolving Issues with Generic Implications*

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# ACKNOWLEDGEMENTS

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# ABSTRACT

This Guideline describes a protocol that may be used by industry and the NRC staff to evaluate and close out selected generic issues. It includes five phases:

1. Identification Phase – Any individual or group (including the NRC staff) may use the Identification Template in Appendix A to forward an issue to the NEI Licensing Action Task Force (LATF) for screening.
2. Screening Phase – The LATF uses the Screening Criteria in Appendix B to screen Phase 1 issues. Those that “screen in” are placed in an evaluation queue in order of priority. The LATF meets periodically with the NRC staff to decide which of these issues to evaluate.
3. Evaluation Phase – The LATF and the NRC staff each prepares a Problem Statement in accordance with the format and content guidance in Appendix C. The problem statements are then reconciled into one mutually acceptable regulatory baseline for use in the evaluation. This phase involves one or more public meetings between the LATF and the NRC staff.
4. Implementation Phase – NEI coordinates with industry organizations to establish close-out criteria and documentation.

A flow chart of the protocol is shown in Figures 1 through 4. A list of key terms and definitions, a list of acronyms, and a list of references are included as Appendices E, F, and G, respectively.

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## 1.0 OBJECTIVES

The Nuclear Energy Institute (NEI) has developed a Regulatory Issue Resolution Protocol (RIRP) to expedite the close-out of regulatory issues that affect a significant number of commercial operating plants.

The objectives of the protocol are to:

- Optimize issue closure in terms of safety, efficiency, and effectiveness.
- Determine the relevant regulatory requirements, guidance, and applicable staff positions (i.e., the “regulatory baseline”).
- Specify the process options and criteria that individual licensees may use to demonstrate compliance with requirements (i.e., the “success path”).
- Optimize the timeliness and durability of issue closure.

To achieve these objectives, the protocol calls for NRC and industry to clarify the detailed regulatory baseline early in the life of an issue. In the context of the protocol the regulatory baseline is comprised of a licensing basis and a technical basis. The licensing basis is the detailed set of formal requirements (i.e., laws, regulations, licenses, and orders), including documented interpretations and applicable staff positions, with which a licensee must comply. The technical basis is the detailed set of formal guidance documents (e.g., codes and standards, Regulatory Guides, Standard Review Plan, generic correspondence, industry initiatives, etc.) that provide the procedures, methods, and other tools for confirming compliance with the licensing basis.

Once the baseline has been determined, the protocol calls for NRC and industry to schedule public meetings to develop a mutually acceptable success path that specifies the actions and documentation necessary and sufficient for issue closure. The documentation associated with the protocol and its plant-specific implementation provides a retrievable record for use in future change-management activities.

## **2.0 THE PROTOCOL**

The RIRP is a protocol for managing the timely evaluation and closure of regulatory issues with generic implications, i.e., regulatory issues that apply to a significant number of operating nuclear plants. The protocol includes a prioritization methodology, flow charts, and documentation guidelines. 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 a concise problem statement for each issue, prepare an issue evaluation and closure plan, and document closure with a reasonable degree of finality.

It is recognized that the above standard project management techniques are expected to be followed with any issue resolution. However, there are some issues that arise out of various programs and inspections that cross over several programs, disciplines, department, etc. These issues rise to a level that resolution is best accomplished by multi-discipline team of technical and licensing experts both cross-functional and across the industry.

### **2.1 Principles**

The principles of issue resolution under the protocol are to use standard project management techniques.

1. Mutual NRC/industry understanding of a Problem Statement that addresses:
  - (1) Safety and risk significance
  - (2) Key terms and definitions
  - (3) The licensing basis and technical basis for evaluation and close-out
  - (4) The scope of applicability, i.e., the organizations expected to implement the results of the evaluation
2. Mutual NRC/industry staying the course to completion:
  - (1) Track and manage new information or issues that emerge during an evaluation
  - (2) Document NRC staff positions and industry commitments
  - (3) Promptly revise industry and NRC guidance documents affected by the overall resolution of the issue
  - (4) Develop a communications plan for timely distribution of pertinent information to affected organizations
3. Industry and NRC agree on resolution.
4. Durable Guidance is issued.

## 2.2 Phases

The RIRP has four phases, which are described below and depicted in Figures 1 through 4:

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. If the issue screens in, the LATF gives it a priority ranking and places it in the evaluation queue.
3. **Evaluation** – When an issue reaches the top of the queue, the LATF forms an RIRP issue team to work with an independent NRC team.
4. **Implementation** – Organizations within the scope of applicability implement the closure plan, including documentation.

### 2.2.1 Identification Phase

1. An individual identifies a potential issue at his/her organization and informs the coordinator of the NEI Licensing Action Task Force (LATF) Steering Group and includes the following information (Appendix A):
  - (1) Regulatory concern
  - (2) Available data and supporting facts
  - (3) Generic applicability
  - (4) Safety significance
  - (5) Potential impact of the issue (compliance, operability, cost, schedule, outage, etc.)
  - (6) Preliminary problem statement
2. The NEI coordinator distributes a summary to the LATF.

Note: Use of the resolution protocol does not preclude taking immediate action as necessary and does not alleviate the responsibility to follow all applicable regulatory requirements.

### 2.2.2 Screening Phase

1. RIRP Team members monitor the LATF website and perform an initial screen of each new potential RIRP issue against the following importance measures:
  - (1) Generic applicability
  - (2) Importance to safety
  - (3) Risk significance
  - (4) Relevant “applicable staff positions”
  - (5) Relevant precedent
  - (6) Impact on industry resources
  - (7) Existing NRC process(es) utilized
2. The NEI coordinator schedules a RIRP Team conference call to complete the initial screen.

3. During the screening conference call, the Team decides which issues to table and which to forward to the Steering Group for a detailed screening.
4. The NEI coordinator documents the results of the initial screen and updates the issue summary on the NEI website.
5. Steering Group members meet periodically to perform a detailed screening of each issue that passes the RIRP Team screen. The purpose of the second screen is to prioritize the issues and choose a limited number for forwarding to NRC based on criteria specified in Appendix B. The criteria help determine the technical, policy, and economic significance of the issue and the number of licensees or other industry groups affected
6. The NEI coordinator schedules a Steering Group conference call to complete the screening process.
7. The NEI coordinator documents the results of the detailed screen and updates the issue summary on the LATF website.
8. During its quarterly internal meetings at NEI, the Steering Group dispositions each issue, records the disposition in the meeting minutes, and reports the results periodically to NEI management.
9. If the issue screens in, the Steering Group prepares a detailed description of the issue, the screening results, and a recommendation that the NRC Staff participate with industry in evaluating and dispositioning the issue. If the issue screens out, the Steering Group provides feedback to the initiator.
10. Obtain management commitment for resources: the package is forwarded to the NRC and NEI to obtain management commitment of resources for the evaluation phase.

### **2.3.3 Evaluation Phase**

1. The evaluation phase begins with the NEI and NRC staffs forming teams comprised of licensing and technical specialists and sponsors.
2. The teams develop a milestone schedule detailing public working meetings frequency and dates, information exchange expectations, meeting preparation, etc. to conduct an evaluation phase comprised of the following basic steps outlined in Figure 3.
3. Compile the information for the evaluation:
  - (1) Develop the problem statement. (Refer to Appendix C.)
  - (2) Determine the scope of applicability of the issue.
  - (3) Determine the regulatory baseline and the technical baseline for evaluating the issue.
  - (4) Define success criteria. (Refer to Appendix D.)
  - (5) Prepare an evaluation plan.
  - (6) Conduct the evaluation.

- (7) Publish the results.
- (8) Prepare a closure plan.

4. Publish and promote industry-implementation.

#### **2.2.4 Implementation Phase**

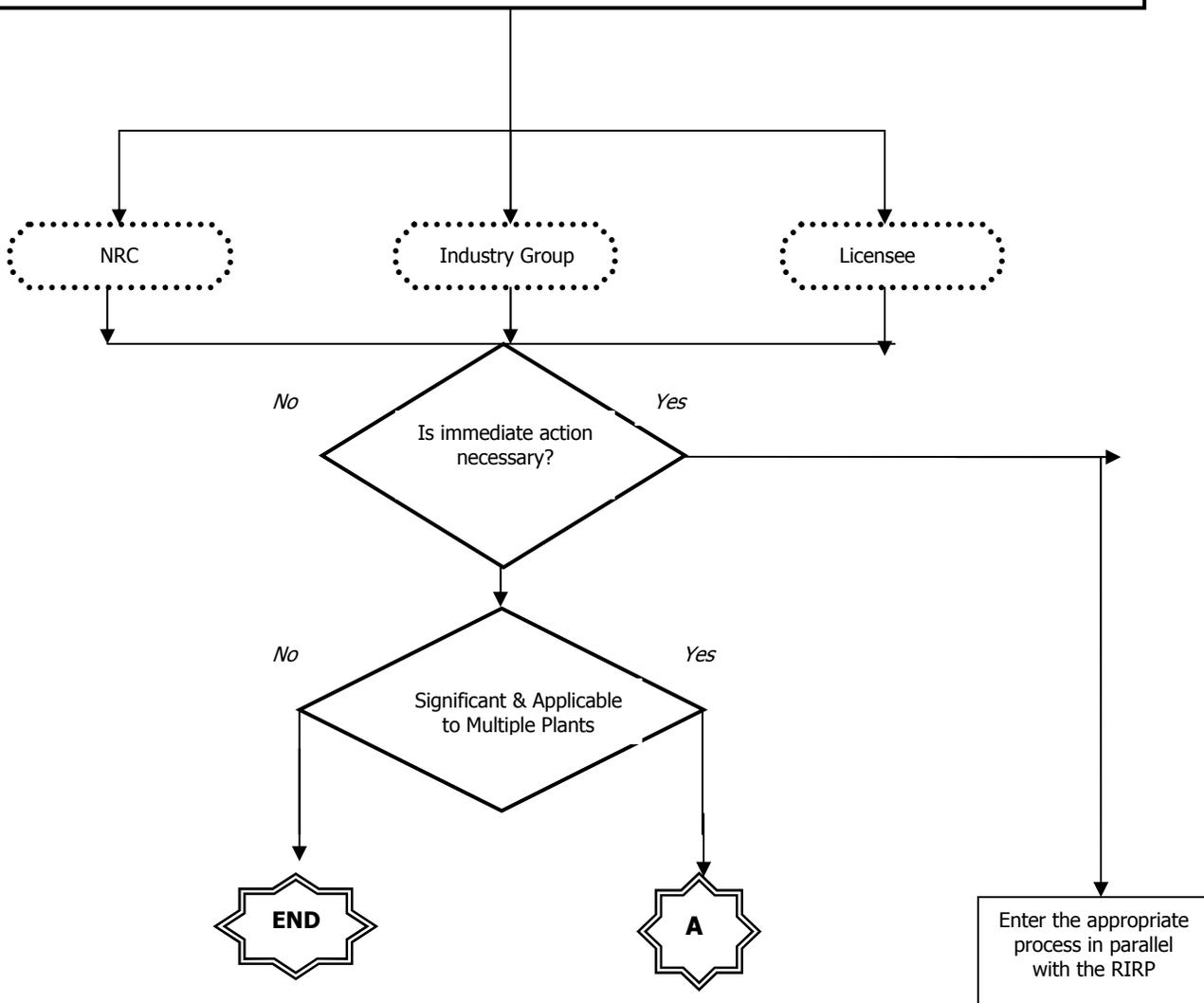
1. Industry implements and documents the approved resolution (Refer to options listed in Figure 4)
2. NRC implements and documents the approved resolution in durable guidance, e.g., regulations, Regulatory Guides, Standard Review Plan.

# FIGURE 1 IDENTIFICATION PHASE

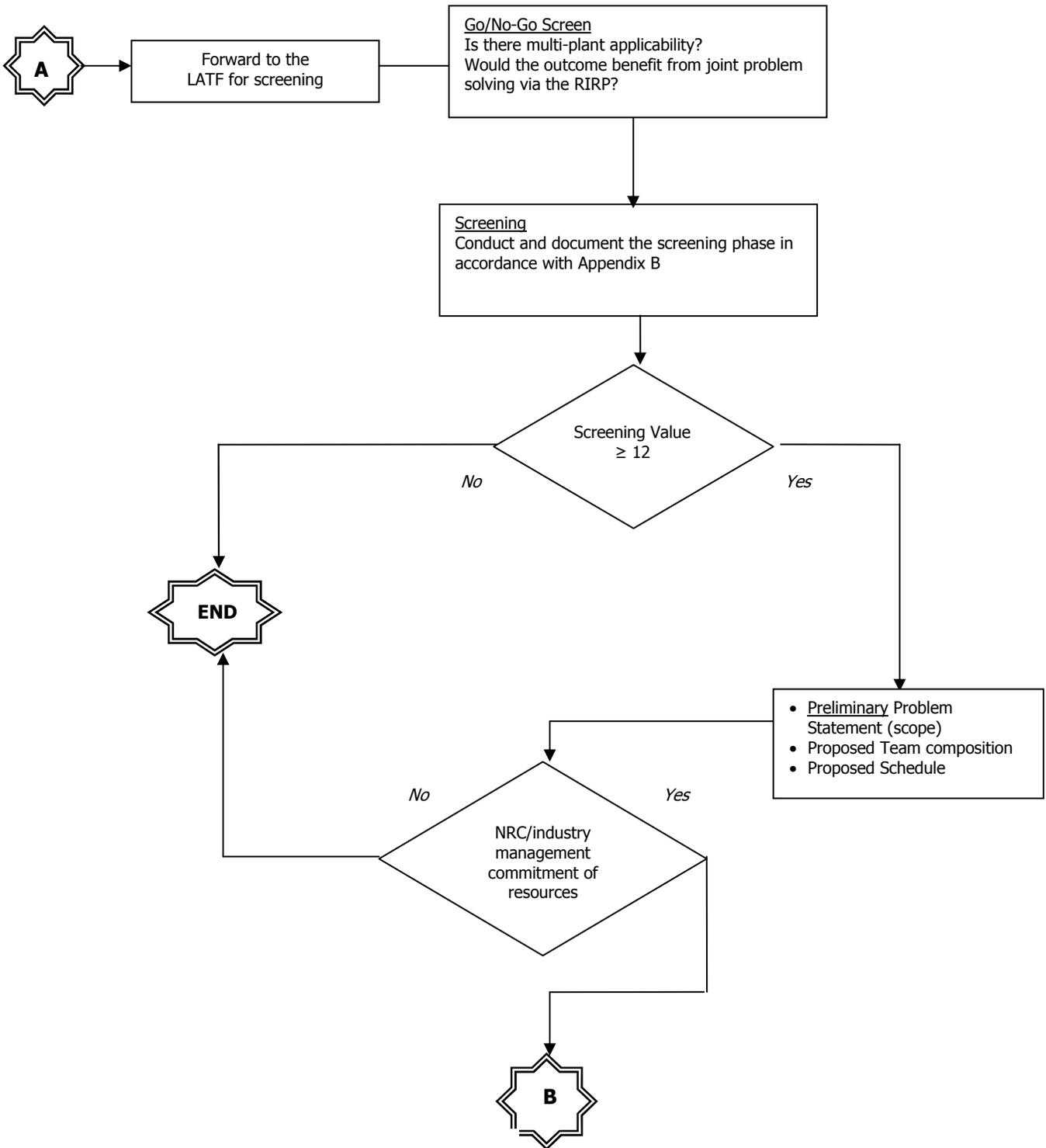
Any NRC/Industry person or group may identify issues that have generic applicability and recommend that they be screened in accordance with the Regulatory Issue Resolution Protocol (RIRP). The following is a list of sources for potential RIRP issues:

- requests for additional information (licensing actions and Topical Reports)
- inspection reports (URIs; NOVs; etc.)
- task interface agreements
- NOEDs
- operating experience reports (INPO)
- licensee event reports (10 CFR 50.72/50.73)
- generic communications
- license amendments (10 CFR 50.90)
- exemptions (10 CFR 50.12)
- requests for relief/alternative (10 CFR 50.55a)
- telecons, meetings, and workshops
- LATF meetings
- Owners Group input
- Referred by the ROP Task Force
- NRC generic communications

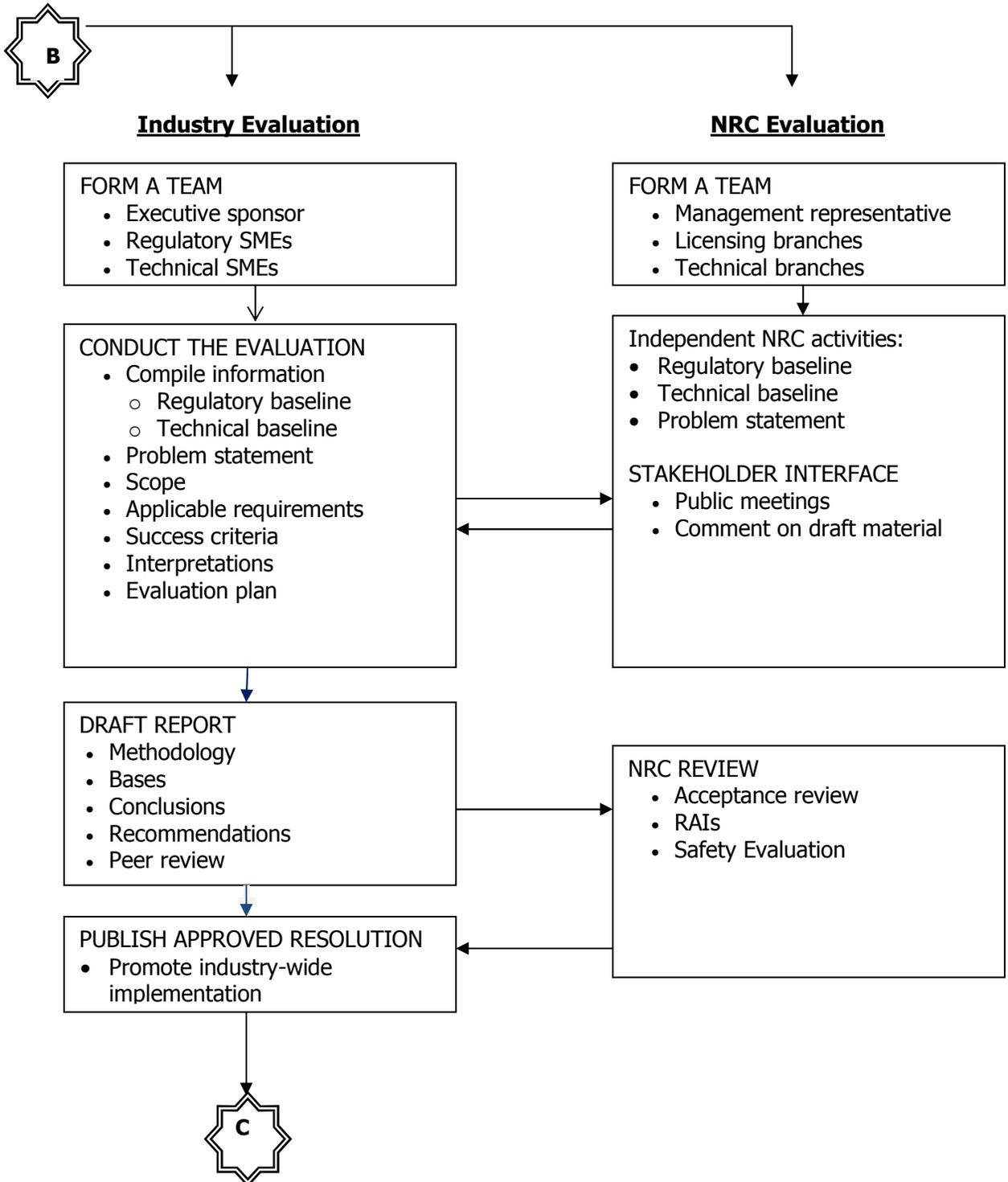
*Note: The RIRP does not alleviate the responsibility to follow all applicable regulatory requirements.*



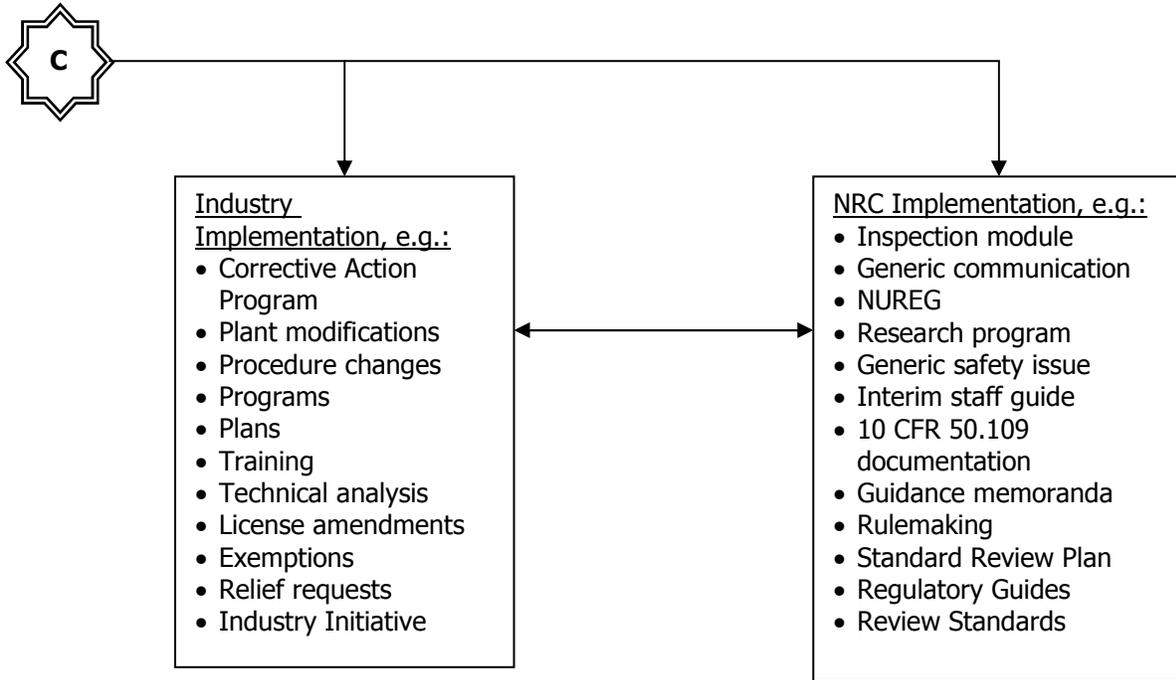
## FIGURE 2 SCREENING PHASE



**FIGURE 3  
EVALUATION PHASE**



# FIGURE 4 IMPLEMENTATION PHASE



## **APPENDIX A IDENTIFICATION TEMPLATE**

- Regulatory concern
- Available data and supporting facts
- Generic applicability
- Safety significance
- Potential impact of the issue (compliance, operability, cost, schedule, outage, etc.)
- Preliminary problem statement
- Existing regulatory process(es) utilized

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## APPENDIX B SCREENING CRITERIA

<u>Screening Criteria</u>	<u>Weight</u>	<u>Range of Priority Values</u>
Relative safety significance	<u>3</u>	High = 2; Medium = 1; Low = 0
Relative risk significance	<u>2</u>	High = 2; Medium = 1; Low = 0
Industry resource availability	<u>1</u>	Now = 1; Later = -1
NRC resource availability	<u>1</u>	Now = 1; Later = -1
Compliance with obligations?	<u>3</u>	Yes = 1; No = 0
Conformance with commitments	<u>1</u>	Yes = 1; No = 0
Operability issue?	<u>2</u>	Yes = 1; No = 0
Shutdown issue?	<u>3</u>	Yes = 1; No = 0
Cost of change	<u>2</u>	High = 2; Medium = 1; Low = 0
Benefit of taking action	<u>2</u>	High = 2; Medium = 1; Low = 0
Degree of complexity	<u>2</u>	High = 1; Low = 0
Degree of initial consensus	<u>1</u>	Low = 1; High = 0
Scope of applicability	<u>3</u>	High = 2; Medium = 1; Low = 0

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# APPENDIX C

## PROBLEM FORMAT AND CONTENT

### Preface

- Issue Description
  - SSCs affected
  - History
  - New Information
- Significance
  - Safety
  - Risk
- Regulatory Baseline
  - Licensing (obligations, requirements, guidance, applicable staff positions)
  - Technical (design requirements, qualification requirements, standards)
  - Plant-specific considerations
- Terms & Definitions
- Scope of Applicability
  - Organizational
  - Technical

### Problem Statement

- A few sentences that describes the current situation:
  - New information (observations, interpretations, operating experience, research, events)
    - What is different
    - What are the open questions
  - How is the new information related to underlying requirements and industry practices?
  - What are the options for resolution?

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**APPENDIX D  
SUCCESS CRITERIA**

## **APPENDIX E KEY TERMS AND DEFINITIONS**

### **ADEQUATE PROTECTION**

The Atomic Energy Act delegates to NRC the responsibility to interpret what is necessary to meet "adequate protection." NRC establishes what is meant by adequate protection through rulemaking and the adjudicatory process. In general, adequate protection is presumptively assured by compliance with NRC requirements. The NRC staff evaluates situations of noncompliance to determine the degree of risk and whether immediate action is necessary. If the NRC determines that non-compliance itself is of such safety significance that adequate protection is no longer provided, or that it was caused by a deficiency so significant it questions a licensee's ability to ensure adequate protection, the NRC may demand immediate action, up to and including shutdown or cessation of licensed activities. [Reference: Atomic Energy Act, Section 182<sup>1</sup>]

### **APPLICABLE STAFF POSITION**

An "applicable staff position" is an NRC staff position that is a documented, approved, explicit interpretation of the regulations and is contained in a document such as the SRP (Standard Review Plan), a branch technical position, a regulatory guide, a generic letter, or a bulletin; and to which a licensee or an applicant has previously committed to or relied upon. [Reference: NRC Management Directive 8.4<sup>2</sup>, page G-1]

### **BACKFITTING**

The Commission recognized the importance of "backfitting" controls in 1985 when it approved a change to 10 CFR 50.109 (subsequently amended in 1988) to establish administrative standards for NRC imposition of new regulations or new interpretations of existing regulations. The rule defines the term "backfitting" as the modification of or addition to systems, structures, components, or design of a facility; or the design approval or manufacturing license for a facility; or the procedures or organization required to design, construct or operate a facility; any of which may result from a new or amended provision in the Commission's regulations or the imposition of a regulatory staff position interpreting the Commission's regulations that is either new or different from a previously applicable staff position. [Reference: 10 CFR 50.109(a)(1)]

### **CLOSURE PLAN**

A "closure plan" is a general statement of all actions necessary and sufficient to close a regulatory issue. It identifies the implementation and documentation options available to organizations within the issue's scope of applicability. Affected organizations adapt the closure plan to accommodate the plant-specific design and licensing bases.

### **COMMITMENT**

See Regulatory Commitment.

### **COMPLIANCE**

The term "compliance" means that a structure, system, or component (SSC) satisfies all requirements of applicable rules, regulations, orders, and licenses (including Technical Specifications). Compliance is based on the intent of the requirement at the time of its promulgation. The NRC typically documents the intent of a requirement in a Federal Register notice, and licensees typically incorporate implementing language into the CLB by updating the Final Safety Analysis Report (FSAR) or other licensee-controlled document. NRC regulations (10 CFR 50.59 and 10 CFR 50.109), supplemented by NRC and licensee procedures, control the imposition of new or different interpretations.

# **APPENDIX E**

## **KEY TERMS AND DEFINITIONS**

### **CURRENT LICENSING BASIS**

The “current licensing basis” is the set of NRC requirements applicable to a specific plant and a licensee's written commitments for ensuring compliance with and operation within applicable NRC requirements and the plant-specific design basis (including all modifications and additions to such commitments over the life of the license) that are docketed and in effect. The CLB includes the NRC regulations contained in 10 CFR parts 2, 19, 20, 21, 26, 30, 40, 50, 51, 52, 54, 55, 70, 72, 73, 100 and appendices thereto; orders; license conditions; exemptions; and technical specifications. It also includes the plant-specific design-basis information defined in 10 CFR 50.2 as documented in the most recent final safety analysis report (FSAR) as required by 10 CFR 50.71 and the licensee's commitments remaining in effect that were made in docketed licensing correspondence such as licensee responses to NRC bulletins, generic letters, and enforcement actions, as well as licensee commitments documented in NRC safety evaluations or licensee event reports. [Reference: 10 CFR 54.2<sup>3</sup>]

### **DESIGN BASIS**

The “design basis” is the set of design information that identifies the specific functions to be performed by the structures, systems, or components of a facility and the specific values or ranges of values chosen for controlling parameters as reference bounds for design. These values may be (1) restraints derived from generally accepted “state-of-the-art” practices for achieving functional goals, or (2) requirements derived from analysis (based on calculations and/or experiments) of the effects of a postulated accident for which a structure, system, or component must meet its functional goals. [References: 10 CFR 50.2, NEI 97-04<sup>4</sup>]

### **DETERMINISTIC**

The term “deterministic,” means that specific causes completely and certainly determine effects. As applied in nuclear technology, it generally deals with evaluating the safety of a nuclear power plant in terms of the consequences of a predetermined bounding subset of accident sequences. Compare with PROBABILISTIC. [Reference: NRC Website Glossary<sup>5</sup>]

### **DURABLE GUIDANCE**

“Durable guidance” is contained in a document subject to a change-control process. Regulations, Regulatory Guides, and the Standard Review Plan are examples of durable NRC guidance documents. The operating license and the final safety analysis report are examples of durable licensee guidance documents. Regulatory Issue Summaries, Information Notices, frequently-asked-question (FAQ) data bases, and internal guidance memoranda do not represent durable guidance because they can be changed without independent oversight or participation by another part of the organization.

### **EVALUATION PLAN**

The “evaluation plan” describes the activities (e.g., surveys, analyses, reports tests, etc.) necessary to define closure of an issue. The industry RIRP Team and its counterpart NRC team independently prepare draft evaluation plans for reconciliation.

### **EVALUATION QUEUE**

The “evaluation queue” is the set of screened issues listed in priority order.

## **APPENDIX E**

### **KEY TERMS AND DEFINITIONS**

#### **GENERIC SAFETY ISSUE**

The NRC has classified five groups of issues as “generic safety issues:” (1) TMI Action Plan items, documented in NUREG-0660 and NUREG-0737; (2) Task Action Plan items, documented in NUREG-0371 and NUREG-0471, as well as all Unresolved Safety Issues (USIs) not originally identified in these two documents; (3) new generic issues identified from various sources; (4) human factors issues, documented in NUREG-0985; and (5) Chernobyl issues, documented in NUREG-1251. [References: NUREGs 0371,<sup>6</sup> 0471,<sup>7</sup> 0660,<sup>8</sup> 0737,<sup>9</sup> 0933,<sup>10</sup> 0985,<sup>11</sup> and 1251<sup>12</sup>]

#### **LICENSING BASIS**

The “licensing basis” for an issue is comprised of:

- The set of obligations established by rules, regulations, licenses, and orders.
- The plant-specific licensing basis documented in the final safety analysis and other docketed correspondence.
- The regulatory guidance that a non-licensee is expected to satisfy in order to conform to NRC staff expectations, for example safety evaluations of vendor topical reports.
- Official NRC interpretations by the Office of the General Counsel.
- Precedent-setting regulatory decisions.

#### **LICENSING PROCESS**

The “licensing process” is the collection of industry and NRC staff activities that are necessary to prepare, submit, review, approve, and maintain a license granted by the Staff pursuant to Title 10 of the Code of Federal Regulations. The overall licensing process is comprised of several sub-processes, such as the license amendment process (10 CFR 50.90), various reporting processes (e.g., 10 CFR 50.72 and 50.73), various change-management processes (e.g., 10 CFR 50.59), the backfitting process (10 CFR 50.109), the inspection process, and others. Some sub-processes are broken down further. For example, the license amendment process includes the acceptance review process and the request-for-additional-information” (RAI) process. [References: LIC-101<sup>13</sup> and LIC 109<sup>14</sup>]

#### **OBLIGATION**

An “obligation” is any condition or action that is a legally binding requirement imposed on licensees through applicable rules, regulations, orders and licenses (including technical specifications and license conditions). These conditions (also referred to as regulatory requirements) generally require formal NRC approval as part of the change-control process. Also included in the category of obligations are those regulations and license conditions that define change-control processes and reporting requirements for licensing basis documents such as the updated FSAR, quality assurance program, emergency plan, security plan, fire protection program, etc. [References: NEI 99-04<sup>15</sup>, LIC-105<sup>16</sup>]

#### **PRECEDENT**

The term “precedent” is defined as something that may serve as an example or rule to be followed in a subsequent act of the same kind. In a regulatory context, a precedent licensing action could be used to aid the evaluation of similar future requests for licensing actions

#### **PRIORITY RANKING**

## **APPENDIX E**

### **KEY TERMS AND DEFINITIONS**

The "priority ranking" of an issue determines its place in the RIRP evaluation queue. The higher ranked issues are evaluated first. The priority ranking of an issue is determined during the screening phase.

#### **PROBABILISTIC**

The term "probabilistic" is associated with an evaluation that explicitly accounts for the likelihood and consequences of possible accident sequences in an integrated fashion. Compare with DETERMINISTIC. [Reference: NRC Website Glossary]

#### **PROBLEM STATEMENT**

A "problem statement" is a detailed statement of the situation or circumstances that give rise to a regulatory issue. It should convey to a knowledgeable reader the nature and extent of a potential deficiency or non-compliance. The industry RIRP Team and the counterpart NRC team independently prepare draft problem statements for further discussion and consolidation into a mutual problem statement.

#### **PROTOCOL**

The term "protocol" is defined as an administrative methodology for inter-organizational coordination and communications.

#### **REGULATORY ANALYSIS**

The NRC has developed guidance on performing a "regulatory analysis" of any regulatory action that involves backfitting. A structured analysis helps ensure that the agency bases its decisions on adequate information, and that the staff arrives at its decisions by following a systematic process. [Reference: NUREG/BR-0058<sup>17</sup>]

#### **REGULATORY BASELINE**

The "regulatory baseline" for an issue is comprised of a "licensing basis" and a "technical basis."

#### **REGULATORY COMMITMENT**

A "regulatory commitment" is an explicit statement to take a specific action agreed to, or volunteered by, a licensee *and* submitted in writing on the docket to the NRC. [Reference: NEI 99-04, RIS 2000-17<sup>18</sup>]

#### **REGULATORY FINDING**

A "regulatory finding" is a determination made by the Commission based on the Code of Federal Regulations. Before approving a plant-specific licensing action, the NRC reviewer or reviewers must make a regulatory "finding." One objective of the RIRP is to understand the finding and its basis in the rules and regulations.

#### **REQUIREMENT**

The term "requirement" as used in this guideline means a legally binding requirement such as a statute, regulation, license condition, technical specification, or order. In this guideline, it is synonymous with the term "obligation."

#### **RIRP ISSUE TEAM**

## **APPENDIX E**

### **KEY TERMS AND DEFINITIONS**

The NEI LATF Steering Group coordinates with industry organizations to identify an “RIRP issue team” of regulatory and technical specialists for each issue that enters the evaluation phase.

#### **RISK-INFORMED REGULATION**

The term “risk-informed regulation” refers to the use of probabilistic risk assessment (PRA) techniques in evaluating regulatory issues. PRA considers nuclear safety in a comprehensive way by examining a broad spectrum of initiating events (circumstances that put a facility in an off-normal condition, such as a reactor trip or “scram” at a nuclear power plant). PRA analysts explore the frequency and consequences of various scenarios, giving a measure of risk. [Reference: NRC website<sup>49</sup>]

#### **SCOPE OF APPLICABILITY**

The “scope of applicability” for an issue is the set of licensees and other organizations subject to the results of a regulatory evaluation of the issue. The scope of applicability is identified early in the protocol and affected organizations are notified and given the opportunity to comment.

#### **SCREENING CRITERIA**

The “screening criteria” are the factors and threshold values used to determine if an issue warrants evaluation. The RIRP screening criteria are defined in Appendix B.

## **APPENDIX E KEY TERMS AND DEFINITIONS**

### **STANDARD PROJECT MANAGEMENT TECHNIQUES**

The protocol employs the following “standard project management techniques:”

- Problem statement
- Criteria for establishing the scope of applicability
- Resource planning (licensing and technical resource needs)
- Success criteria
- Milestones
- Stakeholder participation
- Documented summaries of public meetings
- Periodic status reports

### **SUCCESS CRITERIA**

The “success criteria” are the attributes necessary to achieve closure of an issue. The industry RIRP Team and its counterpart NRC team independently prepare draft success criteria for reconciliation.

### **TECHNICAL BASIS**

The “technical basis” for an issue is comprised of:

- The 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.
- The plant-specific PRA.
- 

### **TOPICAL REPORT**

A “topical report” is a technical document typically submitted by a vendor or an owners group for NRC review and approval in accordance with NRR Office Instruction LIC-500. Licensees may reference the NRC safety evaluation (SE) in requests for licensing action, subject to conditions and limitations documented in the SE. [Reference: LIC-500<sup>20</sup>]

## APPENDIX F ACRONYMS

AOO	Abnormal Operating Occurrence
ASP	Applicable Staff Position
CDBI	Component Design Basis Inspection
CFR	Code of Federal Regulations
CLB	Current Licensing Basis
CLIIP	Consolidated Line Item Improvement Program
CoC	Certificate of Compliance (transportation and storage casks)
DBA	Design Basis Accident
EDG	Emergency Diesel Generator
EPRI	Electric Power Research Institute
EPU	Extended Power Uprate
FOAK	First of a Kind
FSAR	Final Safety Analysis Report
GSI	Generic Safety Issue
IN	Information Notice
ISA	Instrumentation, Systems and Automation Society
ISG	Interim Staff Guide
ISTS	Improved Standard Technical Specifications (the latest version of the STS)
LAR	License Amendment Request
LATF	Licensing Action Task Force
LCO	Limiting Condition for Operation
LER	Licensee Event Report
LSSS	Limiting Safety System Setting
NCV	Non-cited Violation
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
PRA	Probabilistic Risk Assessment
RAI	Request for Additional Information
RG	Regulatory Guide
RIRP	Regulatory Issue Resolution Process
RIS	Regulatory Issue Summary
RLA	Request for Licensing Action
SBO	Station Blackout
SDP	Significance Determination Process
SE	Safety Evaluation (NRC staff)
SRP	Standard Review Plan
SSCs	Structures, Systems, and Components
STS	Standard Technical Specifications (NUREG series 1430-1434)
TI	Temporary Instruction
TIA	Task Interface Agreement
TS	Technical Specifications
TSTF	Tech Spec Task Force (sponsored by the BWR and PWR Owners Groups)
UFM	Ultrasonic Flow Meter
UHS	Ultimate Heat Sink

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## APPENDIX G REFERENCES

- <sup>1</sup> Atomic Energy Act of 1954 (as amended), Section 182, "License Applications."
- <sup>2</sup> U.S. Nuclear Regulatory Commission, Management Directive, MD 8.4, "NRC Program for Management of Plant-Specific Backfitting of Nuclear Power Plants," October 28, 2004.
- <sup>3</sup> Code of Federal Regulations, Title 10, Nuclear Energy, 10 CFR 50.2, "Definitions."
- <sup>4</sup> Nuclear Energy Institute, NEI 97-04, Rev. 1, "Design Bases Program Guidelines," February 2001.
- <sup>5</sup> U.S. Nuclear Regulatory Commission, Website, "Glossary."
- <sup>6</sup> U.S. Nuclear Regulatory Commission, NUREG-0371, "Task Action Plans for Generic Activities (Category A)," November 1978.
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