In order to provide an NRO office concurrence recommendation, an opinion from a NRO subject matter expert was needed for each of the 13 low priority generic issues. The below table summarizes the feedback received from the branches that most closely align with each issue. Comments received are noted as footnotes. The object of the review of each issue was to answer the following questions:

1) Is the issue adequately addressed in the current regulatory program, guidance or oversight?
2) Are you aware of any operating experience that indicates a change in the significance of the issue?
3) Do you have any comments on the RES staff analysis?

Action Plan Item/Issue Number	Title	NRO Div	Branch	SME	Quest 1	Quest 2	Quest 3
I.F.2(1)	Assure the Independence of the Organization Performing the Checking Function	DCIP	CQVA/B	Juan Peralta / Rich Rasmussen	Y	N	N
I.F.2(4)	Establish Criteria for Determining QA Requirements for Specific Classes of Equipment	DCIP	CQVA/B	Juan Peralta/ Rich Rasmussen	Y	N	N
I.F.2(5)	Establish Qualification Requirements for QA and QC Personnel	DCIP	CQVA/B	Juan Peralta/ Rich Rasmussen	Y	N	N
I.F.2(7)	Clarify that the QA Program Is a Condition of the Construction Permit and Operating License	DCIP	CQVA/B	Juan Peralta/ Rich Rasmussen	Y	N	N
I.F.2(8)	Compare NRC QA Requirements with Those of Other Agencies	DCIP	CQVA/B	Juan Peralta/ Rich Rasmussen	Y	N	N
I.F.2(10)	Clarify Requirements for Maintenance of "As-Built" Documentation	DCIP	CQVA/B	Juan Peralta/ Rich Rasmussen	Y	N	N
I.F.2(11)	Define Role of QA in Design and Analysis Activities	DCIP	CQVA/B	Juan Peralta/ Rich Rasmussen	Y	N	N
III.D.2.1(1)	Evaluate the Feasibility and Perform a Value-Impact Analysis of Modifying Effluent-Monitoring Design Criteria	DCIP	CHPB	Ed Roach (For issues related to SRP 11.3 and 11.5)	Y	N	N
III.D.2.1(1)	Evaluate the Feasibility and Perform a Value-Impact Analysis of Modifying Effluent-Monitoring Design Criteria	DSRA	SPCV	Jim O'Driscoll (For issues related to SRP section 6.4)	Y	N	N

Action Plan Item/Issue Number	Title	NRO Div	Branch	SME	Quest 1	Quest 2	Quest 3
III.D.2.1(2)	Study the Feasibility of Requiring the Development of Effective Means for Monitoring and Sampling Noble Gases and Radioiodine Released to the Atmosphere	DCIP	CHPB	Ed Roach (For issues related to SRP 11.3 and 11.5)	Y	Y[1]	N
III.D.2.1(2)	Study the Feasibility of Requiring the Development of Effective Means for Monitoring and Sampling Noble Gases and Radioiodine Released to the Atmosphere	DE	ICE1	Jack Zhao	Y	N	Y[2]
III.D.2.1(3)	Revise Regulatory Guides	DCIP	CHPB	Ed Roach (For issues related to SRP 11.3 and 11.5)	Y	N	Y[3]

[1] With respect to RG 1.97, this aspect is partly addressed in CHPB SRP Chapter 11.5 review responsibility in that that plant stacks and building vents are now equipped with rad effluent monitoring instrumentation system with monitoring range sensitivities that cover effluent releases or release rates expected during normal operation, anticipated operational occurrences, and accident conditions. Prior rad effluent monitor designs consisted typically of two systems, one for normal operation and anticipated operational occurrences, and another accident conditions. The issue then was the accuracy of instrumentation responses over the overlapping operational ranges.

[2] A short description of how GDC 64 supports the removal of this low-priority GSI item should be added to Section 2.3.2 in the RES staff analysis.

[3] The reg analysis should include citations for NUREG-0133 (Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants, October 1978). The citations of NUREG-1301 and -1302 need to be supplemented with NUREG-0133. Note that under GL 89-01, the RETS requirements were relocated to these two NUREGs. The NUREGs identify and list these requirements as they were once listed in prior Tech Specs. However, an acceptable format and content of a working ODCM is presented in NUREG-0133 and the associated format and content has not changed because of the issuance of NUREG-1301 and -1302. For example, NUREG-0133 presents (i) equations to comply with the dose limits of 10 CFR Part 20.1301 and 20.1302, (ii) how to comply ECL limits of Part 20, App. B, Table 2, (iii) how to comply with the design objectives of Part 50, App. I, and (iv) how to derive and establish instrumentation alarm set points to meet these regulatory requirements.
The reg analysis should include citations for 10 CFR Part 20.1301(e) in demonstrating compliance with 40 CFR Part 190 for effluents and external radiation exposures from all the nuclear power block, such as plant buildings, turbine building skyshine, radwaste buildings, and radwaste storage and staging areas. Note that the NUREG-1301 and -1302 identify compliance which is based, in part, on the requirements 10 CFR Part 20.1301 and 20.1302, 20.1501, and Part 50, App. I. As a result, this discussion should include a citation for NUREG-0543 (Methods for Demonstrating Compliance With the EPA Uranium Fuel Cycle Standard (40 CFR Part 190), February 1980), which addresses compliance with 10 CFR Part 20.1301(e) for sites with collocated multiple reactors and doses to nearby residents.

Action Plan Item/Issue Number	Title	NRO Div	Branch	SME	Quest 1	Quest 2	Quest 3
81	Impact of Locked Doors and Barriers on Plant and Personnel Safety	DCIP	COLP	Michael Junge	Y	N	N
127	Maintenance and Testing of Manual Valves in Safety-Related Systems	DE	CIB1	Jim Strnisha	Y	N	N
167	Hydrogen Storage Facility Separation	DSRA	SFPT	Robert Vettori	Y	N	N