

INTERAGENCY AGREEMENT		1. IAA NO NRC-HQ-20-14-D-0022		PAGE OF 1 2	
2. ORDER NO.		3. REQUISITION NO. NRR-14-0201		4. SOLICITATION NO.	
5. EFFECTIVE DATE 06/10/2014		6. AWARD DATE 06/10/2014		7. PERIOD OF PERFORMANCE 06/16/2014 TO 10/31/2014	
8. SERVICING AGENCY PACIFIC NORTHWEST NAT LAB ALC: DUNS: +4: US DEPARTMENT OF ENERGY PACIFIC NORTHWEST SITE OFFICE PO BOX 350 MS K9-42 RICHLAND WA 99352 POC Genice Madera TELEPHONE NO. 509-372-4010			9. DELIVER TO BERNARD GRENIER 11555 ROCKVILLE PIKE ROCKVILLE MD 20852		
10. REQUESTING AGENCY ACQUISITION MANAGEMENT DIVISION ALC: 3100001 DUNS: 040535809 +4: US NUCLEAR REGULATORY COMMISSION ONE WHITE FLINT NORTH 11555 ROCKVILLE PIKE ROCKVILLE MD 20852-2738 POC Jeffrey Mitchell TELEPHONE NO. 301-287-0955			11. INVOICE OFFICE US NUCLEAR REGULATORY COMMISSION ONE WHITE FLINT NORTH 11555 ROCKVILLE PIKE MAILSTOP O3-E17A NRCIPACRESOURCENRCGOV ROCKVILLE MD 20852-2738		
12. ISSUING OFFICE US NRC - HQ ACQUISITION MANAGEMENT DIVISION MAIL STOP 3WFN-05-C64MP WASHINGTON DC 20555-0001			13. LEGISLATIVE AUTHORITY Energy Reorganization Act of 1974		
			14. PROJECT ID		
			15. PROJECT TITLE SEE BLOCK 18 BELOW		
16. ACCOUNTING DATA 2014-X0200-FEEBASED-20-20D007-11-4-149-1034-253D					
17. ITEM NO.	18. SUPPLIES/SERVICES	19. QUANTITY	20. UNIT	21. UNIT PRICE	22. AMOUNT
	Title: Review of License Amendment Request for the Virgil C. Summer Nuclear Station, Unit 1 Transition to National Fire Protection Association Standard 805 (NFPA 805), "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants" ****This new DOE Agreement replaces the Project ID code from J4642, Task Order 3, to NRC-HQ-20-14-D-0022.***** Continued ...				
23. PAYMENT PROVISIONS			24. TOTAL AMOUNT \$19,700.00		
25a. SIGNATURE OF GOVERNMENT REPRESENTATIVE (SERVICING)			25b. SIGNATURE OF GOVERNMENT REPRESENTATIVE (REQUESTING)		
25c. DATE			25d. CONTRACTING OFFICER JEFFREY R. MITCHELL		25e. DATE 10/13/2014

SUNSI REVIEW COMPLETE

TEMPLATE - ADM001

JUN 24 2014

ADM002

Period of Performance: June 16, 2014 through October 31, 2014

The proposal from PNNL, dated June 5, 2014, for Project ID code J4642, Task Order 3 is hereby transferred to this new DOE Agreement No. NRC-HQ-20-14-D-0022.

The outstanding tasks/effort remaining on Project ID code J4642, Task Order 3 shall be performed on this new DOE Agreement No. NRC-HQ-20-14-D-0022.

The remaining funds under Project ID code J4642, Task Order 3, shall be used first. Once the funds under J4642, Task Order 3 are exhausted, the DOE Laboratory shall transition the billing efforts to this new Agreement NRC-HQ-20-14-D-0022.

Consideration and Obligations:

- (a) Authorized Cost Ceiling \$19,720.00
(Note: The authorized cost ceiling is the difference from the authorized cost ceiling on project ID code J4642, Task Order 3 minus the total obligations allotted for project ID code J4642, Task Order 3 plus the within scope increase.)
- (b) The amount presently obligated with respect to this DOE Agreement is \$19,720.00. When and if the amount(s) paid and payable to the DOE Laboratory hereunder shall equal the obligated amount, the DOE Laboratory shall not be obligated to continue performance of the work unless and until the NRC Contracting Officer shall increase the amount obligated with respect to this DOE Agreement. Any work undertaken by the DOE Laboratory in excess of the obligated amount specified above is done so at the DOE Laboratory's sole risk.

Attachment (1): Statement of Work
Attachment (2): DOE Standard Terms and Conditions
PNNL's proposal dated June 5, 2014 is incorporated by reference.

NRC COR: Bernard Grenier
DOE LAB PI: Steve Short
Master IAA: N/A

Statement of Work

Title: Review of License Amendment Request for the Virgil C. Summer Nuclear Station, Unit 1 Transition to National Fire Protection Association Standard 805 (NFPA 805), "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants"

Contracting Officer

Representative: Bernard L. Grenier, Bernard.Grenier@nrc.gov, 301/415-2726

Contracting Officer

Representative (Alternate): Jay Robinson, Jay.Robinson@nrc.gov; 301-415-2878

TAC Number: ME7586

BACKGROUND

The Office of Nuclear Reactor Regulation (NRR) is currently implementing a new risk-informed, performance-based (RI/PB) rule under Section 50.48(c) of Title 10 of the Code of Federal Regulations (10 CFR 50.48(c)). This rule endorses the National Fire Protection Association Standard 805 (NFPA 805), "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants."

Virgil C. Summer Nuclear Station, Unit 1 (VC Summer) has submitted a license amendment request (LAR) to adopt 10 CFR 50.48(c) (NFPA 805), and this project-level description of work outlines the requirements for technical assistance to be provided by the Pacific Northwest National Laboratory (PNNL) to the Fire Protection (AFPB) and PRA Licensing (APLA) Branches in the Division of Risk Assessment (DRA), NRR, to complete the technical review and develop the safety evaluation for the VC Summer license amendment request (LAR).

This project will require coordination between PNNL, the Center for Nuclear Waste Regulatory Analysis (CNWRA), and the NRC staff. For the VC Summer LAR, CNWRA (under a separate contract) will be providing technical expertise in fire modeling and programmatic areas, the NRC staff will be providing technical expertise in safe shutdown and circuit analysis, probabilistic risk assessment, and radiological release and PNNL will be providing technical expertise in nuclear power plant fire protection and fire protection engineering.

NEED FOR MODIFICATION

A modification is needed to this task order so the NRC can obtain technical expertise from PNNL to assist the staff in completing the review of the Summer 10 CFR 50.48 (c) (NFPA 805) LAR in the technical review area of probabilistic risk assessment. Originally this task order only included obtaining technical expertise from PNNL in the area of nuclear power plant fire protection and fire protection engineering.

PNNL completed tasks 1 through 5 below the anticipated level of effort. Task 6 was determined to not be needed and is being deleted. Since the level of effort was below what was expected, the remaining hours are being used to obtain the services of PNNL to assist the staff in completing the review in the area of Probabilistic Risk Assessment. Since the majority of the review work has already been conducted by the NRC staff PNNL's role will primarily be to

assemble a technical evaluation report based on information already obtained by the NRC staff.

During the course of the review of the PRA aspects of the Summer NFPA 805 LAR, PNNL uncovered several areas where the licensee used unapproved methods which resulted in five new and unanticipated requests for additional information (RAIs) from the licensee. It is anticipated that the level of effort required to review the responses to these RAIs is 80 hours beyond currently available effort. This also assumes that the licensee's responses will be acceptable. It is also anticipated that the licensee may take up to three months to provide its responses, depending on how it decides to respond to the RAIs. Therefore, the period of performance needs to be extended for an additional four months.

OBJECTIVE

The objective of this task order is to obtain technical expertise from PNNL to assist the staff in determining the safety adequacy of the VC Summer 10 CFR 50.48 (c) (NFPA 805) LAR in the technical review area of nuclear power plant fire protection and fire protection engineering and probabilistic risk assessment so the NRC staff can make a licensing decision regarding whether or not the LAR is in accordance with 10 CFR 50.48(c); NFPA 805, 2001 edition; and the guidance provided in the SRP Section 9.5.1.2.

TECHNICAL AND OTHER SPECIAL QUALIFICATIONS REQUIRED

One senior-level Nuclear or Mechanical Engineer on an intermittent, part-time basis to serve as the Principal Investigator (PI) who has background and experience in nuclear power plant design and operations to include procedures related to operations at full-power conditions and shutdown modes. The PI should also be knowledgeable in the application of NUREC/CR-6850 methods which pertains to nuclear power plant fire protection probabilistic risk assessment (PRA) models. The PI must be able to ensure that the LAR reviews performed by the domain experts (e.g., FPE, PRA, SSD/CA) are integrated and address areas that cross-cut domains, i.e., that the review by one domain expert is integrated with the review by other domain experts). The PI must also ensure that the PRA model that is reviewed by the PRA expert makes assumptions about the fire protection program and that the review of the fire protection program assumptions in the PRA model must be a coordinated/integrated review by both the PRA and FPE experts.

One senior-level Fire Protection Engineer on an intermittent, part-time basis who is knowledgeable of nuclear power plant design and operation to include procedures related to operations at full-power conditions and shutdown modes and who has in-depth knowledge and experience in the design and operation of fire protection systems and programs implemented at nuclear power plants, and experience in the application of Appendix R regulations.

One senior-level Risk Engineer on an intermittent, part-time basis who is knowledgeable of nuclear power plant design and operation to include procedures related to operations at full-power conditions and shutdown modes and who has in-depth knowledge and experience in nuclear power plant probabilistic risk assessment.

The individuals should be knowledgeable in the preparation of input to NRC safety evaluation reports.

The engineers must be able to satisfy the escorted access requirements for the owner controlled area (OCA) and protected area (PA) of VC Summer.

WORK REQUIREMENTS AND SCHEDULE

Tasks

Scheduled Completion

1. Based on 10 CFR 50.48(c); NFPA 805, 2001 edition and the guidance provided in the SRP Section 9.5.1.2., review and evaluate the Summer 10 CFR 50.48(c), (NFPA 805) LAR in the areas of nuclear power plant fire protection and fire protection engineering and determine the safety adequacy in the areas listed below to enable the staff to make a licensing decision regarding whether or not the LAR is in accordance with the regulations.
 - NFPA 805 fundamental fire protection program elements and minimum design requirements; NFPA 805 Chapter 3 requirements;
 - Power Block;
 - Electrical raceway fire barrier systems;
 - Performance based methods for NFPA 805 Chapter 3 elements;
 - Defense in depth and safety margins;
 - Risk-informed or performance-based alternatives to compliance with NFPA 805;
 - Radioactive release performance criteria; and,
 - NFPA 805 Chapter 3 Fundamental Elements Compliance Matrix.

Identify areas where any additional information is needed to determine if the LAR is in accordance with the applicable regulatory requirements and develop questions for the applicant to obtain the additional information. Prepare a technical letter report.

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| <ol style="list-style-type: none"> a. Draft. | <p>Four weeks after receipt of authorization.</p> |
| <ol style="list-style-type: none"> b. Incorporate NRC comments and prepare the final report. | <p>One week after receipt of NRC comments.</p> |
| <ol style="list-style-type: none"> 2. Prepare for and travel to the Summer site to participate in the an audit of the NFPA 805 LAR in accordance with LIC-111, "Regulatory Audits" to review the same areas of nuclear power plant fire protection and fire protection engineering as described in Task 1 and identify the need for more information (RAIs). Prepare a technical letter report. | |
| <ol style="list-style-type: none"> a. Prepare on-site RAIs. | <p>The day prior to the last day of the audit.</p> |
| <ol style="list-style-type: none"> b. Prepare a trip report. | |

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| (1) Draft. | One week after the audit. |
| (2) Incorporate NRC comments and submit the final report. | One week after receipt of NRC comments. |
| 3. Based on the work performed to date, determine the adequacy of the areas evaluated above (see Task 1 listing) | |
| and prepare a Technical Evaluation Report (TER) utilizing the template and guidance supplied by the NRC. | |
| a. Draft. | Four weeks after the audit. |
| b. Incorporate NRC comments and prepare the final report. | One week after receipt of NRC comments. |
| 4. Review and evaluate the RAI responses and determine if the response(s) adequately addressed the open items. If the response(s) is not acceptable, discuss the RAI response(s) with the Technical Monitor who may determine that a conference call is needed to discuss the RAI response(s) with the licensee in which case the PI will be notified and expected to participate in the conference call. If the response is deemed inadequate, prepare an RAI. If the response is deemed to be adequate, incorporate the results in the TER prepared under Task 3. | As mutually agreed upon between the TM and the PI. |
| 5. Review and evaluate any additional RAI responses and determine if the response(s) adequately addressed the open items. If the response(s) is not acceptable, discuss the RAI response(s) with the Technical Monitor who may determine that a conference call is needed to discuss the RAI response(s) with the licensee in which case the PI will be notified and expected to participate in the conference call. If the response is deemed inadequate, list the issue as an open item in the TER. If the response is deemed to be adequate, incorporate the results in the TER and prepare the updated TER. | |
| a. Draft. | As mutually agreed upon between the TM and the PI. |
| b. Incorporate NRC comments and prepare the final TER. | One week after receipt of NRC comments. |
| 7. Based on the work performed to date, prepare a TER utilizing | |

Information already obtained by the NRC staff, the NRC provided template and NRC guidance in the area of Probabilistic Risk Assessment.

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|---|--|
| a. Draft. | Four weeks after
After work start
approval |
| b. Incorporate NRC comments and prepare final report. | One week after receipt
of NRC comments. |

DELIVERABLES

Technical Reporting Requirements

NOTE: All reports are to be prepared in Microsoft Word 2007 or compatible format and submitted electronically to the Project Officer. The transmittal letter and cover page shall contain the job code number (JCN), the task order number, and title.

1. At the completion of Task 1, submit a technical letter report, draft and final as appropriate, that contains the list of preliminary questions which clearly articulates the bases for the need for further information or discussion. See Attachment 1 for guidance in the preparation of RAIs.
2. At the completion of Task 2., submit a technical letter report that contains the audit RAIs. In addition, submit a technical letter report, draft and final as appropriate, that contains a summary of the activities performed during the audit and a summary of significant highlights, observations, insights, and findings. Include the title and description of any documents, slides, or other materials reviewed on the trip. As appropriate, describe possible resolution of the findings/observations, noting disposition responsibility (if appropriate) of the items presented and reviewed.
3. At the completion of Task 3, submit a Technical Evaluation Report that contain an assessment of the adequacy of the applicant's LAR in the areas evaluated following the template and guidance for VC Summer SER provided by the Technical Monitor.
4. At the completion of review of each RAI response under Task 4, provide a verbal response for those responses found not to be adequate on a schedule mutually agreed upon with the Technical Monitor. If the RAI response is deemed to be inadequate, submit a technical letter report that contains the additional RAI(s) on a time-frame mutually agreed upon with the Technical Monitor. If the RAI response(s) is deemed to be adequate, update the TER.
5. At the completion of review of any additional RAI responses under Task 5, on a schedule mutually agreed upon with the Technical Monitor, submit the updated TER, draft and final as appropriate; any inadequate response(s) from the licensee is considered an open item and is to be reflected as such in the TER.
6. At the completion of 6, submit a trip report that contains a summary of the work performed and any highlights of the review team meeting.

7. At the completion of task 7, submit a Technical Evaluation Report that contains an assessment of the adequacy of the applicant's LAR in the area of probabilistic risk assessment following the template and guidance for VC Summer SER provided by the Technical Monitor.
- 8.

Monthly Letter Status Reporting Requirements

Add Alex.Klien@nrc.gov to the distribution list.

A budget is to be developed for each Task based on the agreed upon allocation of the level of effort among the Tasks. Separate expenditures for each Task will be reported in the MBLR against the budget using the following format:

Monthly Letter Status Reporting Requirements

Authorized Cost Ceiling: \$ _____		Funds Obligated to date: \$ _____		
	Expenditures	Task Expenditures	Percentage	
<u>Tasks</u>	<u>Planned Budget</u>	<u>for the Period</u>	<u>Cumulative</u>	<u>vs. Budget</u>
1.	\$	\$	\$	%
2.	\$	\$	\$	%
3.	\$	\$	\$	%
4.	\$	\$	\$	%
5.	\$	\$	\$	%
6.	\$	\$	\$	%
7.	\$	\$	\$	%
Total	\$ _____	\$ _____	\$ _____	% _____

A monthly expense variance greater than 10 percent must be explained in the "Problem/Resolution" section.

NOTE: Once a variance reaches 15 percent, prior approval is required in writing from the NRC Project Officer, or a Modification is to be processed.

MEETINGS AND TRAVEL

One one-person, five day trip to the Summer Nuclear Power Plant site located in Jenkinsville, S.C.

One two-person, three-day trip to NRC Headquarters located in Rockville, Maryland.

NRC-FURNISHED MATERIALS

All relevant plant specific documentation, including the IPE and IPEEE submittals and staff evaluation reports, has already been provided to PNNL within two weeks of the of the time-frame needed to perform the work.

NOTE: Some of these documents contain proprietary information and must be safeguarded against unauthorized disclosure. After completion of work, the documents should either be destroyed or returned to NRC. If they are destroyed, please confirm this in an E-mail to the Project Officer and include the date and manner in which the documents were destroyed.

The NRC TM will provide those NRC documents related to licensing activities (for example, any Non-Publicly available SERs, audit reports, and related documents) that are readily available. The NRC TM will provide access to training material pertinent to the NFPA 805 LARs reviews or other NRC documents and docketed correspondence on related issues. The PNNL staff shall identify any additional NRC documentation that is needed and the TM will determine whether these will be provided by the NRC or obtained directly by the PNNL from ADAMS, NRC public document room or the NRC website at www.nrc.gov.

For this task order the NRC will provide to or provide access to PNNL (not an all inclusive listing) the following materials:

1. The VC Summer NFPA 805 LAR for technical review. NRC will inform PNNL of the date that the submittal was placed in ADAMS for review schedule purposes.
2. Regulatory Guide 1.205, "Risk-Informed, Performance-Based Fire Protection For Existing Light-Water Nuclear Power Plants"
3. NUREG-0800, Standard Review Plan, Section 9.5.1.2, "Risk-Informed, Performance-Based Fire Protection Program"
4. Office of Nuclear Reactor Regulation, Office Instruction, Revision 3 of LIC-101, "License Amendment Review Procedures"
5. NEI 04-02, Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c), Revision 2, Nuclear Energy Institute (NEI), Washington, DC, April 2008.
6. NFPA 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants," 2001 Edition, National Fire Protection Association, Quincy MA.
7. NUREG/CR-6850, "EPRI/NRC-RES, Fire PRA Methodology for Nuclear Power Facilities," Volumes 1 and 2, USNRC, September 2005.
8. Regulatory Guide 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," ML070240001 (Clarification to RG 1.200, Revision 1, ML071940235) (Draft Revision 1 was issued as DG-1161, 09/2006, ML062480134) (Revision 0, 02/2004, ML040630078, was issued with SRP Chapter 19.1, ML040630300) (Draft Revision 0 was issued as DG-1122, 11/02, ML023360076)
9. NUREG-1824, "Verification and Validation of Selected Fire Models for Nuclear Power Plant Applications," U.S. Nuclear Regulatory Commission, Washington, DC, May 2007

10. Regulatory Guide 1.174, Revision 1, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," USNRC, November 2002.

11. NRC NUREG 0800, Standard Review Plan, Chapter 19.2, "Review of Risk Information Used to Support Permanent Plant-Specific Changes to the Licensing Basis: General Guidance," Revision 0, June 2007

12. NEI 00-01, Guidance for Post Fire Safe Shutdown Analysis, Revisions 1 & 2, Nuclear Energy Institute (NEI), Washington, DC.

13. Templates for development of various technical review related documents including but not limited to Audit Reports, Requests for Additional Information, Safety Evaluations, Technical Specifications, etc.

14. Other NRC guidance such as Frequently Asked Questions (FAQs), historical documents related to previous 10 CFR 50.48 (c) reviews, etc.

OTHER APPLICABLE INFORMATION

License Fee Recovery

The work specified in this SOW is license fee recoverable.

Assumptions and Understandings

It is understood that the level of effort for each Subtask, as appropriate, contains sufficient effort to conduct telephone conference calls with the NRC Project Officer. Such phone calls, for example, might be arranged by the NRC VC Summer PM with the NRC Project Officer to discuss the RAIs and to reach an understanding with the applicant. Comments might be provided to PNNL such that the RAIs may have to be resubmitted by PNNL. (Note: In some cases, based on the additional information obtained from the applicant on the conference call, the RAI may not need to be issued.)

The level of effort assumption for the audit under Task 2 is based eight hours for preparation and travel to the site, 40 hours to participate in the audit and return travel and 16 hours for documentation. Twenty four hours are allocated for other personnel to participate in relevant portions of the audit by conference call.

It is understood that the RAI responses under Tasks 4 and 5 may not be received all at once, but intermittently and that draft responses may be available for review. The level of effort for Task 4 assumes there will be about 50 RAI responses to be addressed and it will take, on the average, two hours to address an RAI response including documentation. Task 5 assumes there will be 10 additional RAI responses and it will take, on the average, two hours to address a response including documentation.

The level of effort assumption for Task 6 is based on eight hours for preparation and travel, 16 hours for the meeting and eight hours for return travel and preparation of the report for each traveler.

Unless otherwise approved by Letter of Technical Direction or by a Modification, the level of

effort among the Tasks cannot be exceeded by more than 15 percent.

It is understood that this project will require coordination between PNNL, the Center for Nuclear Waste Regulatory Analysis (CNWRA), and the NRC staff since all three will be providing technical expertise and input for the review of the LAR.

Organizational Conflict of Interest Disclosure

DOE recognizes that Section 170A of the Atomic Energy Act of 1954, as amended, requires that NRC be provided with disclosures on potential conflicts when NRC obtains technical, consulting, research and other support services. DOE further recognizes that the assignment of NRC work to DOE Laboratories must satisfy NRC's conflicts standards. Accordingly, when NRC enters into an agreement with the PNNL to perform work for NRC, and during the life of the agreement, the PNNL shall review and promptly disclose its current work, planned work and where appropriate, past work for DOE and others (meaning, organizations, in the same/similar technical area as the NRC project scope of work, e.g. (included but not limited to), NRC licensees, vendors, industry groups or research institutes that represent or are substantially comprised of nuclear utilities) for work in the same or similar technical area as the proposed NRC project. Disclosures for current or planned work for DOE or others in the same or similar technical area as the proposed NRC work are to include (1) the name of organization; (2) dollar value; (3) period of performance of the work identified; and (4) statements of work for the projects. NRC shall then determine whether a conflict would result and, if one does, determine, after consultation with the PNNL, the appropriate action NRC or the PNNL should take to avoid the conflict, or when appropriate under the NRC procedures, waive the conflict.

If the PNNL determines there is no applicable work in the same or similar technical area, it should be stated in its proposal.

Guidance for Preparing Requests for Additional Information (RAIs)

Additional information necessary to resolve open or unresolved items identified during the review of the information associated with the LAR needs to be requested in a manner that is unambiguous, has an adequate basis, and is necessary for the safety review. RAIs should be developed using the following guidance:

1. An RAI should include the appropriate basis for requesting the information. The basis should explain why the information is needed, including how it will be used to help make a reasonable assurance finding.
2. Judgmental language should be avoided.
 - a. Questions should not make adequacy determinations.
 - b. Words like "unacceptable" or "deficient" and "deviation" should be avoided. Likewise, avoid using phrases like "*the staff will require*" since it is premature to require anything when asking questions.
3. Questions should be focused, not open-ended.
 - a. The RAI should be in the form of a question or an imperative to provide what is needed to complete the review. When the reviewer needs specific information or the underlying issue may not be apparent, the RAI should clearly identify the information requested and/or the underlying issue.
 - b. "If ... then" questions (questions that could lead to follow-on questions) should provide both parts of the question.

After the RAIs have been forwarded to the applicable NRC Project Manager, teleconferences and/or public meetings may be held before issuing the RAIs:

- a. These discussions prevent misunderstandings of the intent of the questions.
- b. If a draft RAI is clarified or resolved before issuance, the NRC staff will prepare a documented record of the resolution (i.e., minutes of a public meeting or a teleconference summary).

After the RAIs have been issued, the applicant may request a telephone conference and/or a public meeting:

- a. The teleconferences and/or meetings provide additional clarification of the intent of the RAIs and will help the licensee prepare satisfactory responses.
- b. To ensure that the response appropriately addresses the RAI, the licensee may submit a draft response (which the NRC docket in the Agency-Wide Documents Access and Management System (ADAMS)) and may request a follow-up teleconference and/or meeting.

Guidance for Preparing Requests for Additional Information (RAIs) (Continued)

After receiving RAI response from the licensee, the NRC may hold a teleconference and/or a public meeting:

- a. The purpose of discussing a response with the licensee is to better understand the response and/or clarify areas of disagreement. If the resolution of a response relies on information not submitted to the NRC, the licensee should submit the information on the docket. The submission is not intended to be another RAI or a means to minimize the number of SER open items, but frequently reduces the number of SER open items.
- b. If the areas of disagreement remain, the unresolved RAI becomes an SER open item.