

December 3, 2014

MEMORANDUM TO: Anthony J. Mendiola, Chief  
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Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

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SUBJECT: SUMMARY OF OCTOBER 22, 2014, AUDIO CONFERENCE  
CALL ON EVALUATION MODEL CHANGE METHODOLOGY

On October 22, 2014, staff from the U.S. Nuclear Regulatory Commission (NRC) staff held a conference call with nuclear fuel vendors and member of the public. The purpose of the call was to inform the vendors of the NRC staff's current views and to start formal dialog on computer code change methodology.

The NRC staff began my stating that there had been a number of recent meetings where the topic of the potential for a code model change methodology was discussed. Further, the NRC staff said that there is a concern with how long it takes for codes to get updated. The NRC staff emphasized that this model-change process was focused on changes to computer-evaluation models used for transient and accident analysis and was not intended to be applied to topical reports.

Continuing, the NRC staff reported that it was looking to establish a consistent way individual vendors could use a uniform process in the evaluation model-change process. The goal is to have process that would allow vendors to make certain changes under their quality control program and only require significant changes to be submitted for review by the NRC staff. The NRC staff clarified that an important step in this process is identifying what changes could be performed internally and which changes would need to be submitted for review.

Therefore, this process would provide guidance on when vendors had to come to NRC. The NRC staff wanted to define what the boundaries of what could be changed and what needed to come to the NRC staff for review. In addition, the NRC staff wanted to define the notification process vendors would use to inform the NRC staff of changes.

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The NRC staff informed the participants that it was already seeing topical reports with areas identified in the report where changes would be made without prior NRC staff review.

Next, the call was opened to the participants to raise topics. The first questions asked was what the objective of the call was. The NRC staff responded that it wanted the vendors and stakeholders to know the NRC staff view about the code-change methodology. Also, the NRC staff stated that there is interest in this topic and it wanted the vendors to think about how a process like this might be developed.

The vendors noted that having a common problem statement on what the NRC staff wanted to solve would provide them with the same information to use in developing its thoughts on the process. The NRC staff took this back as their action item and is developing such a statement. In addition, the vendors asked what the vehicle was for this process. The NRC staff responded that that had not yet been determined. However, a topical report on the approach from the Nuclear Energy Institute or the Electrical Power Research Institute could be one way.

The NRC staff discussed one possibility for such a process. Changes would be assigned into one of three bins: white, gray, and black. The “white” bin could be those changes that could be made without NRC staff review. The “black” bin would be changes that could not be made without NRC staff review. The “gray” bin would be the grey area of changes. Those might require the NRC staff to do an audit to see if the changes required prior NRC staff review.

One suggestion from vendors was that changes could be made to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.59 (10 CFR 50.59). It was suggested that vendors could be incorporated into 10 CFR 50.59. The discussion noted that 10 CFR 50.59 applied to facilities that were licensed but that other portions of 10 CFR, such as Part 21, applied to vendors. Therefore, rulemaking was an approach that would be considered.

The next discussion topic raised by the vendors was that the NRC staff said the methodology applied to codes but not to topical reports. However, the codes were documented in topical reports, therefore, wasn't the change process actually applicable to topical reports. The NRC staff emphasized that the methodology was solely focused on codes and not topical reports.

The process was not intended to allow changes to topical reports but rather would allow code changes that would then be documented. The type of documentation, supplement or update to a topical report, was not yet determined. However, topical reports themselves could not be changed in this process without NRC review.

It was important to note this distinction because there are a large number of topical reports under NRC staff review and those reports deal with diverse and complex topics. The NRC wanted to ensure that any process developed that would apply to topical reports took into consider the full range of topical reports under NRC review.

Further, the NRC staff noted that it wanted to keep the code-change methodology focused on the fuel-reload computer-evaluation models. If physical phenomena were calculated using a code, then the NRC staff believed that was the scope of what it was addressing. As a clarification, the NRC staff stated that the codes used as part of the analyses for Standard Review Plan sections 4.2, 4.3, and 4.4 were the focus of this methodology.

In closing the NRC staff and the vendors discussed the potential for a workshop. The vendors indicated that a workshop would be appropriate but that a written problem statement would help focus the workshop. The NRC staff agreed to take that as an action item from the call.

An opportunity was offered for stakeholders participating in the call to make comments.

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