SLR Optimization and Efficiency

NRC Public Meeting
March 11, 2016
Rockville, MD

Jerud Hanson, Eric Blocher, Albert Piha
Nuclear Energy Institute

nuclear. clean air energy.

NEI
NUCLEAR ENERGY INSTITUTE

Summary of Objectives

- Discuss SLRA content and format to support increased review efficiency

- Optimizing management oversight to maintain schedule adherence

- Identify process improvement initiatives to achieve overall efficiencies in support of the NRC's "Project AIM 2020" initiative and the Industry's "Nuclear Promise"

Content and Format of SLRA

The Lead plant SLRA will be developed to current industry standards

- Content of SLRA will be consistent with NEI 95-10 guidelines as well as evolving improvement initiatives
- High degree of consistency with GALL-SLR expected
- SLRA content augmented where needed to facilitate identifying:
  - Significant changes in scope
  - New TLAAs and updates to existing TLAAs
  - Consideration of AMP operating experience

NEI
NUCLEAR ENERGY INSTITUTE

nuclear. clean air energy.

Content and Format of SLRA (cont'd)

- Chapter 2, significant scope changes identified where needed

- Chapter 3, Table 1's, 2's, AMRs, AMPs expected to reflect very high degree of GALL-SLR consistency

- Chapter 4, few (if any) new TLAAs expected. Updates, extensions, change summaries added where needed. Dispositions of (iii) well-coordinated with associated AMP

- OE access/availability and ROP reviews should show that aging management is effective

Review Process Considerations

- Reduce or eliminate many audit/inspection activities (e.g. Scoping Audit and/or AMP Audit/IP 71002), consolidate all into one focused, 1-week visit plus more extensive portal reviews and video conferencing
  - Extensive team mobilizations/ multiple week tasks are expensive and resource-consuming when more efficient modes now available
  - Resident Inspector involvement/current ROP inspections already cover much of AMP effectiveness, etc.
  - Site visits could include material condition verification and any program owner face-to-face meetings

NEI
NUCLEAR ENERGY INSTITUTE

nuclear. clean air energy.

Review Process Considerations

- Set the model schedule of 18 month or less – let the model help to drive efficiencies
- Find ways to use portal for handling of RAIs
- Consider a risk based approach to RAIs
- Utilize other vehicles for communication such as LiveMeeting, Webtop, Video Conferences to improve communications
- Perform review of complex technical issues/areas (e.g. TLAAs, RVI) early in the review
- Consider single ACRS Review if SER has no open items

Optimizing Communication

- NRC Management reviews draft RAIs to ensure clarity in issue, regulatory basis, and determined if required for reasonable assurance

- More than one follow-up RAI should trigger management communication with NRC and applicant to clarify significance or find alternate resolution

- Part 50 issues and items of low risk significance should be addressed by ROP/current processes and kept separate from SLRA process

Optimizing Management Oversight

- Recommend weekly meetings/phone conference with NRC PM for schedule adherence and RAI updates

- Periodic Executive level meetings for lead SLRAs (e.g. quarterly)

- Identify and escalate SER open items with management early in the process

Conclusions

- Continue discussion on SLRA content and format to support maximum review efficiency

- Continue dialog on optimizing the NRC review of the SLRA

- Continue to explore process improvement Initiatives to achieve reasonable assurance determination in a cost effective manner

Target NRC Review Schedule for 18 months

Backup Slides

Remote Review to Eliminate Environmental Audit

- Environmental considerations are unlikely to be substantially different from original LRA

- New and significant evaluation may warrant site visit on a case by case basis

- Consider using resident inspector for limited walkdowns if needed to support elimination/abbreviation of environmental audit