

Discussion on the Results of the Subsequent License Renewal (SLR) Optimization Working Group Safety Review Process and Guidance

Office of Nuclear Reactor Regulation
Division of License Renewal

**Category 2 Public Meeting
November 10, 2016**

Agenda

Topic	Time
<ul style="list-style-type: none">• Overview, Opening Remarks and Purpose	09:00AM-09:15AM
<ul style="list-style-type: none">• Review Action Items	09:15AM-09:45AM
<ul style="list-style-type: none">• Safety Review Process<ul style="list-style-type: none">➤ Initial Activities: Pre-Application and Acceptance Review➤ General Optimization of SLR Safety Review➤ Changes to SLR Audits and Processes	09:30AM-10:00AM
<ul style="list-style-type: none">• Portals<ul style="list-style-type: none">➤ Efficiencies in the Use of Portals➤ Expectations for Portal Use	10:00AM-10:30AM
<ul style="list-style-type: none">• Regional Inspection Activities<ul style="list-style-type: none">➤ Changes to Regional Activities for SLR➤ Continuation of Inspection Activities➤ Optimization of Regional Inspections	10:30AM-11:00AM
<ul style="list-style-type: none">• Industry Presentation and Remarks• Public Comments and Questions	11:00AM-11:30AM
<ul style="list-style-type: none">• Summary of Action Items and Closing Remarks	11:30AM-12:00PM

Overview and Opening Remarks

Jane Marshall, Acting Director
Yoira Diaz-Sanabria, Branch Chief
Office of Nuclear Reactor Regulation
Division of License Renewal

Purpose

- Initial decisions from the SLR optimization working group
- Identify areas and topics for future public meetings and plan for future interactions
- Communication and documentation of SLR optimization results

Review Action Items

Action Item	Status
The staff should evaluate how long the portal needs to stay active to sufficiently support the subsequent license renewal application (SLRA) review.	To be discussed during today's presentations
The staff should evaluate the value in applicants highlighting/marking the scoping changes on boundary drawings.	To be discussed during today's presentations
The staff needs to determine the start time (T_0) for a SLRA review.	To be discussed during today's presentations
The staff should consider developing a list of operating experience (OE) key words that are consistent and generic for every audit.	To be discussed during today's presentations
The staff needs to determine whether audit documentation that is only available on-site still needs to be made available in the form of hard-copies, or is it sufficient to provide the information electronically (portal, CD, pen drive).	To be discussed during today's presentations
The staff will continue to evaluate the need for inspection procedure (IP) 71002 inspections during the SLRA review.	To be discussed during today's presentations

Safety Review Process and Portals

Bill Rogers
Senior Reactor Engineer
Office of Nuclear Reactor Regulation
Division of License Renewal

Initial Activities: Pre-Application and Acceptance Review

- Scouting and site visit
 - Places for holding public meetings, libraries, meet and greet local officials
- Acceptance review performed for up to 45 days following receipt of the application
- The staff review will begin at the completion of the acceptance review
- During acceptance review:
 - Early identification of material to be pre-loaded into portal
 - List of key words for operating experience review
- The portal load occurs after notification of an affirmative completion of the acceptance review

General Optimization of SLR Safety Review

- SLRA submitted electronically
- Provide supporting documentation and OE via portal
- SLR safety review and audit activities include:
 - Scoping and screening (S&S) methodology
 - Aging management – aging management programs (AMPs), time-limited aging analysis (TLAA), aging management review (AMR) line items, and relevant OE
- Aging management audit activities
 - In-office – use of portals and telecommunication tools (e.g. GoToMeetings or GoToWebinars)
 - On-site – minimized resources
- All on-site activities are aligned to occur early in the review process
- Use of portal is necessary for increasing efficiency and streamlining review

Changes to SLR Audits & Processes

- On-site Scoping and Screening Modification and Operating Experience (SSMOE) audit occurs 3 months after acceptance
 - Review modifications to the S&S methodology used to develop the SLRA relative to that which was used to develop the license renewal application (LRA) and the effects of any modification on the S&S results
 - Review of SLR drawing development - SLR drawings may indicate (text or figures) whether the system was modified, and to what extent, to inform the technical reviewers
 - Review the applicant's corrective action database and other applicable documentation to identify OE relevant to age-related degradation and AMP performance
- Reduced on-site staff time and resources and on-site applicant support

Changes to SLR Audits & Processes

- Aging management audit occurs 3-4 months after acceptance
- Audits performed by staff in-office and on-site managed by the project manager, in both length and conduct, with scheduled break-out sessions
- In-office and on-site audits include review of AMPs, TLAAs, and AMR line items
- Staff performs the majority of the review of aging management information during the in-office portion of the audit
- In-office review activities mostly supported by portal and telecommunications

Changes to SLR Audits & Processes

- On-site portion of the aging management audit to observe pre-identified plant conditions and configurations as required to complete the aging management audit
- On-site team members represent specific technical areas (e.g., mechanical, material, structural, electrical, and systems)
 - Capable of supporting multiple areas of review
 - Address questions or concerns from the in-office portion of the aging management audit
- Optimize the staff and applicant's time and resources on-site

Changes to SLR Audits & Processes

- Specific technical issues (STI) audit occurs 3-4 months or on an as-needed basis
- On-site activity as necessary to augment the aging management audit review activities
- STI audits are highly focused and used to facilitate and expedite communications with the applicant to resolve complex technical issues early in the review process
 - Identified by the staff during the acceptance review and scheduled at the beginning of the review process
 - Additional STI audits may be required to resolve follow-up issues as the review progresses
- Minimize the need for multiple rounds of requests for additional information (RAIs)
- Early closure of technical issues supports the elimination of an SER w/Open Items

Efficiencies in the Use of Portals

- Staff will use portals during the audit
 - Perform review of primarily non-docketed basis documents
- Staff will identify documents to be placed on the portal early in review
 - Allow for staff preparation prior to audit activities
- During audit, staff reviews may identify information that requires docketing
- Documents placed in portal may be removed once technical review complete
- Portal capability is to remain available during technical review process
- Use of a portal is important in supporting a timely review schedule
- Placing documents on portal, and having portal access available off-site and on-site, precludes need for preparation of paper documents

Expectations for Portal Use

Portal Preload

- Common documents – procedures, analyses, S&S, and AMR reports; current licensing basis information and age-related OE identified by the staff
- Information required for the safety review of specific AMPs, TLAAs, and AMR line items
- Earlier access to specific aging management information will optimize the review process timeline and may reduce the need for certain on-site activities

Expectations for Portal Use

Portal Controls

- Memorandum of understanding will be issued describing expectations
- The portal will be password-protected, and passwords will be distributed to NRC staff members and contractors directly involved in the SLRA review on a need-to-know basis
- The portal will not support any printing, saving, or downloading functions
- The conditions associated with the portal will be maintained throughout its use during the SLRA safety review process
- NRC staff members given password access to the online reference portal will be informed of the conditions of use of the online reference portal by NRC project managers

Expectations for Portal Use

Portal Content

- AMP basis documents
- Implementation plans and procedures related to the AMPs as referenced in the basis documents
- OE and corrective actions associated with AMPs (as reviewed and organized by NRC staff during the SSMOE audit)
- Response to generic communications related to the AMPs
- Calculations/analyses associated with the disposition of TLAAs
- Portal content will be monitored and controlled by the project manager

Regional Inspection Activities

Heather Jones
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Office of Nuclear Reactor Regulation
Division of License Renewal

Potential Changes to Regional Inspection Activities for SLR

- Evaluating the elimination IP 71002 (pre-renewal inspection) for SLR
- The basis for the consideration is:
 - IP 71002 for SLR duplicates IP 71002 activities for first renewals
 - IP 71002 for SLR overlaps with HQ audit activities for SLR
 - Reasonable assurance can be obtained based on audit, public meetings, and RAI documentation
- Eliminating the IP 71002 inspection for SLR would remove the need for:
 - A regional inspection report
 - Regional participation during Advisory Committee on Reactor Safeguards (ACRS) meetings
 - The regional administrator letter

Continuation of Inspection Activities

- HQ staff would continue to perform a review of AMPs, conduct plant personnel interviews, and walk down relevant structures, systems, and components as part of the HQ audits for SLR
- The IP 71002 inspection for first renewals will continue
- IP 71003 will be retained for SLR
 - Is unique, one-time inspection that is only performed by regional inspectors to verify the applicant's readiness to enter the period of extended operation
- The resources for the IP 71003 for first renewals will remain unchanged

Optimization of Regional Inspections

- It is recommended that a regional inspector participate during the HQ audit for SLR to assist with the reviews and provide continuity for the IP 71003 inspection activities for SLR
- The resources for the IP 71003 inspection for SLR will be modified depending on the GALL Report Revision the applicant was originally licensed to

QUESTIONS?

Industry Presentation and Remarks

Public Comments

Summary of Action Items and Closing Remarks

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