

## Cubbage, Amy

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**From:** Cubbage, Amy  
**Sent:** Thursday, May 25, 2017 3:13 PM  
**To:** TSCHILTZ, Michael; 'AUSTGEN, Kati'; 'Amir Afzali'  
**Cc:** Segala, John; Caruso, Mark; Stutzke, Martin; Monninger, John; 'Franovich, Mike'; Reckley, William  
**Subject:** NRC staff preliminary comments on NEI white paper "Modernization of Technical Requirements for Licensing of Advanced Non-Light Water Reactors"  
**Attachments:** LMP LBE White Paper Draft 24 MAY NRC RLSO.docx; Staff High Level Comments.docx; Alternative Table .docx

On April 13, 2017, a draft of the Licensing Modernization Project's (LMP's) "Licensing Basis Event Selection" white paper (ML17104A254) was provided for NRC staff review. This paper was discussed at a public meeting on May 3, 2017, as part of ongoing dialogue in support of the Licensing Modernization Project, during which the NRC staff provided initial observations on this draft white paper and committed to provide written feedback by the end of May to support continued discussion. This email completes that action. We have also scheduled a public meeting on June 22, 2017, to discuss this feedback and other topics of interest regarding Non-LWRs.

The NRC's preliminary feedback on the draft licensing basis event selection (LBE) white paper is provided in three attachments to this email as described below:

(1) LBE paper markup:

- a. The staff's markup of the draft LBE paper provides some specific comments.
- b. As discussed on May 3, the staff did not provide comments on the material we have marked in green italics. This text is largely background information and unlikely to be included in proposed regulatory guidance that will be developed.
- c. The staff comments provided within the markup of the draft LBE paper are intended to be considered along with the high-level comments provided in Attachment 2. In general, the staff did not attempt to provide draft revised text to address the high level comments. It is expected that the LMP would consider the high level comments and reflect the associated changes in the next revision of the LBE paper.
- d. There may be additional changes needed within the draft LBE paper to ensure consistency and to reconcile the draft with the resolution of comments or response to questions.

(2) High level comments

- a. This attachment provides the staff's high level comments on the proposed approach. As discussed above, the staff did not attempt to address these comments in its markup of the LBE paper. These comments are intended for discussion on June 22, and for LMP to consider in its next revision.

(3) Table

- a. The draft LBE paper emphasizes its use for selecting design basis accidents and safety related structures, systems, and components. It would be useful to understand how LMP views the use of the licensing basis events (LBEs) in other parts of the regulations. The staff's attached table provides, as an example for discussion, a possible relationship between the LBEs and the analyses/implementation of different regulatory programs such as establishing necessary operational limits, siting constraints, and appropriate emergency preparedness requirements.

Please contact me if you have any questions. Bill Reckley will return to the office on June 5.

Thank you,

Amy E. Cubbage, Sr. Project Manager for Non-LWR Activities

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