

July 26, 2017 RITF Public Meeting – Industry Notes

Status of Licensing Actions/Schedule Updates

NRC provided a review of licensing action metrics, including the quantity of licensing actions which missed predicted months and/or quarters along with potential causes. The discussion provided clarity on NRC indicators/measurements (i.e. the metric tracks original planned submittal dates and does not account for changes communicated to project managers).

The industry understands that the NRC does not intend to issue additional Regulatory Issues Summaries going forward to obtain scheduling information provided that existing good communication between licensees and their project managers continues to provide needed information for the agency to plan their workload.

Regulatory Dashboard Update

The industry provided an update on its intent to produce and publish a quarterly dashboard to provide insights on both industry and agency performance on licensing and compliance issues. Both NRC and industry agreed to endeavor to reduce duplicity and to work to align existing NRC indicators, required reports to Congress, and the dashboard to the extent possible. NRC and industry agreed to further discussions so that the industry can better understand NRC's internal metrics and the ability to share those indicators and/or underlying data with NEI for the purposes of populating the dashboard.

NRC indicated that the transition to using the new RRPS system was going smoothly, and that there was a potential to develop additional tools or reporting capabilities after inspection aspects of the system are addressed in the fourth quarter.

Control of Unclassified Information

A representative of the agency's Office of the Chief Information Officer provided a briefing on upcoming changes to how documents, including some licensee documents, may be categorized and how unclassified information may be more securely controlled. NRC is currently developing an agency-specific policy to respond to a government-wide executive order.

It appears the scope of the executive order would be limited to the manner in which the NRC controls the information in-house and should not impact the manner in which licensees control the same information within their facilities and staffs. However, the industry desires to solidify this understanding due to the potential impact to resources, technology, and operational efficiency that controlling information may cause.

The industry suggests working with NRC (a combination of NRR, NSIR, and relevant corporate support offices) outside of the RITF in order to better understand the potential impacts of this federal initiative.

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Status of Generic Communications

NRC provided a status update of requested generic communications under review or development. NRC explained that items are added to the list early in the consideration process, and that some may be removed without any publication.

The industry provided its perspective that some topics on the list prompt concern, and that additional detail such as an abstract or reason for consideration would be helpful in planning for forthcoming generic communications.

NRC and industry agreed to maintain a review of the list as a standing RITF agenda item.

Service Life RIS

NRC provided an overview of the latest draft RIS, released in June and subject to CRGR review. The NRC indicated that much had changed since the earlier draft RIS released in 2016 in response to industry and internal comments. The industry provided feedback that some of the more general language in the draft RIS could be open for interpretation during inspections, leading to confusion and unnecessary clarifying conversations in the field. The industry intends to engage with CRGR during their review process to express these concerns.

NRC shared plans to provide seminar-style training to the inspection community following issuance of the RIS to ensure a common understanding of its intent. The industry offered to engage with NRC in the development and delivery of such materials in order to promote consistency.

Operability Determination Process

The industry provided an update on the development of entry criteria to be used to determine if a specific plant condition warranted an immediate operability determination. The entry criteria, which had been discussed at previous public meetings, are currently undergoing pilot testing on a sample of condition reports at two different fleets. The first test was completed in advance of the RITF meeting and generated positive results in obtaining efficiencies without compromising safety or quality of licensed operator reviews. The SROs involved in the testing provided useful feedback on language changes for the process document.

Following completion of the second test, the industry intends to revise its draft guidance and begin dialogue with the identified NRC team in the fourth quarter to begin a process that leads to endorsement of the NEI guidance.

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Design Compliance Enforcement Discretion Process

The NRC shared that its proposed DCED process, intended to be presented to the Commission in June, would be delayed until the fourth quarter of 2018. NRC stated that recent (and pending) changes to the backfit process, in addition to other pending initiatives, may reduce the need for a process such as DCED.

Review of Engineering Inspections

NRC provided a briefing on current status of the project. The NRC team is developing their three best options. Upcoming milestones are as follows:

- October 10 – a planned public meeting in Atlanta to discuss the use of licensee self-assessments
- November 14-15 – a planned public meeting in Rockville to discuss the three best options
- December 12 – the team’s target date for providing the options to the Commission
- Calendar Year 2020 – beginning of next triennial inspection cycle and target for implementing the option approved by the Commission

The three options should be ready to share with industry prior to the October 10 meeting on self-assessments. NRC is working on providing a SharePoint site for posting and exchanging information on options to gain efficiencies. No estimated date when that site will be activated.