

REPORT ON WESTINGHOUSE LESSONS LEARNED TOPIC 5, ACTION 2

The “Westinghouse Lessons Learned Actions Plan” contained 5 topics each with specific actions to be taken to address the lessons learned. The activities were assigned to various staff in the Office of Nuclear Material Safety and Safeguards, Division of Fuel Cycle Safety, Safeguards, and Environmental Review (FCSE). Topic 5, Action 2 is addressed in this report.

The report is organized into four sections including the statement of Topic 5, Action 2; a summary of the activities taken; the recommendations; and completion of the assigned tasks.

I. Statement of Topic 5, Action 2

Topic 5 addressed the area of Knowledge Management. This was defined in the Westinghouse Action Plan as:

Knowledge Management: Evaluate the efficiency and effectiveness of tools available to facilitate knowledge management during an event. Include a review of the processes and resources used to disseminate knowledge, develop staff, support succession planning, and document opportunities for improvement.

Topic 5, Action 2 stated:

(P)* Action 2 – Revise guidance and develop training on: (1) use of information contained in integrated safety analysis (ISA) Summary updates, and (2) development of safety evaluations in a manner that supports inspections and enforcement. ...

1. Develop guidance for use of information contained in ISA Summary updates in license amendment reviews.
2. Develop guidance that describes preparation of licensing documentation in a manner that supports the inspectors’ ability to conduct inspections and enforcement.
3. Determine appropriate location of each guidance document (i.e., License Review Handbook (LR Handbook) or NUREG-1520 [“Standard Review Plan for Fuel Cycle Facilities License Applications”]).
4. Implement training on the guidance.

These tasks were addressed by development of revisions to the FCSE LR Handbook.

II. Summary of Activities to Resolve the Action

The working group obtained recommendations from a number of sources to develop the revisions to the LR Handbook. The working group met with multiple Project Managers (PMs) in FCSE to gain insights into existing processes and obtain recommendations on ways to improve handling of the ISA Summary annual updates and include regional involvement during development of safety evaluation reports (SERs). Input was obtained from Region II inspectors through a number of email and phone interactions. Once the recommendations were collected, a number of proposed revisions were added to the LR Handbook. The working group believes that the scope of the proposed revisions are adequately addressed in the updated LR

Handbook and no training on revisions is needed. However, as a good practice, the Division should consider providing staff an overview of the changes implemented in the next revision of the LR Handbook.

III. Recommendations

The working group is providing proposed revisions to two chapters of the LR Handbook. First, the working group is proposing revisions to Chapter 12, "Safety and Safeguards Evaluation Reports," to support improved knowledge sharing between the NRC headquarters staff and the Region on the development of SERs. Second, the working group is recommending revising Chapter 14, "Review of Integrated Safety Analysis Updates," to better define the PM's role in processing the licensee's annual ISA Summary since Region II has been assigned responsibility for reviewing the annual ISA Summaries.

Proposed Changes to Chapter 12:

1. Recommend draft SERs for major licensing activities be provided to the regional Project Inspector (PI) in parallel to the concurrence process to allow the inspection staff opportunity to comment on the proposed action.
2. Encourage the PMs and technical reviewers to be aware of the facilities' compliance history by reviewing events and enforcement history, inspection reports, and talking to the inspection staff.

Changes to Chapter 14:

1. Clarify that PMs should perform the tasks necessary to acknowledge the receipt of the ISA Summary annual update, i.e. ensure the submittal is complete, conduct a sensitive unclassified non-safeguards information review, process the documents into the appropriate NRC database, and notify the regional PI. The PM's should scan the changes in the ISA annual update during the acknowledgement review to confirm the submittal is complete and for general awareness as the PM.
2. State that the PM needs to notify the PI of receipt of the ISA Summary annual update. Clarify that the PI has the responsibility for reviewing the ISA Summary annual update, consistent with Title 10 of the *Code of Federal Regulations*, (10 CFR) Part 70.72, in preparation for or during inspections.
3. State that, as a good-practice, the PM's should consider visiting the site during the regional Plant Modification inspection, as part of the PM's annual site visit. This allows the PM's to observe portions of the Plant Modification inspection and assist the inspection staff as needed or requested, while visiting the site for other PM activities.

The proposed revision to Chapter 12 and 14 are provided in the enclosure to this document using redline strike out. The revisions will be provided to the PM responsible for updating the LR Handbook for consideration during the next routine update.

IV. Completion of the Tasks

The four tasks for Topic 5, Action 2 were completed as follows:

1. Develop guidance for use of information contained in ISA Summary annual updates in license amendment reviews.

Response: The proposed revisions to Chapter 14 of the LR Handbook provide guidance to PMs performing an acceptance review for the ISA annual update and for communication with inspection staff. Some best practices for participating in the Plant Modification inspection are provided. The working group confirmed that NUREG-1520, "Standard Review Plan for Fuel Cycle Facilities License Applications," Revision 2, states that technical reviewers should consider relevant information in the ISA Summary when performing licensing reviews. In addition, proposed guidance in Chapter 12 encourages reviewers to consider compliance history which includes the ISA.

2. Develop guidance that describes preparation of licensing documentation in a manner that supports the inspectors' ability to conduct inspections and enforcement.

Response: The proposed revisions to Chapter 12 of the LR Handbook provide good-practices for PMs to consider the licensees compliance history during development of the SER. The revised guidance also recommends seeking regional review and comment on the draft SER. Seeking, obtaining, and addressing the regional inspectors' views on the SER supports mutual understanding between Headquarters and the Region regarding the license request.

3. Determine appropriate location of each guidance document (i.e., LR Handbook or NUREG-1520)

Response: The LR Handbook was identified as the appropriate location for guidance on processing the ISA Summary update and development of SERs. Both of these subjects have dedicated chapters in the LR Handbook. There are no revisions to NUREG-1520 because the proposed changes do not affect acceptance criteria for the NRC staff or licensees.

4. Implement training on the guidance

Response: The changes to the LR Handbook are self-explanatory and do not require a separate training session. The proposed revisions to the LR Handbook can be incorporated at the next routine update of the document. These changes can be highlighted to the Division as part of the notification of revisions to the LR Handbook. As a good practice, the Division should consider providing the staff an overview of the changes implemented in the next revision of the LR Handbook.

The proposed revisions to the LR Handbook are provided as Enclosure 2 to the memo. They will be provided to the PM's responsible for updating the LR Handbook for consideration in the next revision of the LR Handbook.