

**Enclosure 1**

## **REGULATORY ISSUES TASK FORCE (RITF)**

Nuclear Energy Institute (NEI) Summary of 7/11/2018 Public Meeting

### **LICENSING WORKLOAD MANAGEMENT AND STAGGERING RISK-INFORMED APPLICATIONS**

NRC discussed its workload management processes and the number of risk-informed license amendment submittals (e.g. TSTF-545, TSTF-505 and 50.69) it has received and expects to receive in calendar year 2018. NRC management conducts weekly meetings to discuss status of its risk-informed licensing workload. NRC has performance metrics to complete 95% of its licensing reviews within 1 year and 100% within 2 years of the date of acceptance. NRC requested the industry consider staggering its 50.69 submittals to help manage the risk-informed licensing action workload. Industry representatives said they will take that request for consideration, but asked if the NRC was gaining efficiencies in its reviews of subsequent 50.69 submittals. NRC management took an action to have internal meetings to discuss efficiency gains going forward for 50.69 submittals and other risk-informed submittals.

### **REVIEWER CHALLENGES BEYOND CURRENT STANDARDS**

The industry raised an issue of generic concern regarding NRC reviewers requiring licensees go beyond currently accepted standards, including standard TS wording, when submitting license amendment requests. The industry gave two examples, but explained that the issue is broader than the examples presented. One example concerns amendments for alternate source term and the assumption that the dose consequence analysis must be assessed with all containment penetrations open, even though the TS Bases requires administrative controls to close the penetrations with sufficient details to assume the penetration will be closed. Another example was related to calculating additional dose operators will receive in transit to the control room, which is inconsistent with guidance provided in RG 1.183. The NRC said that RAIs are reviewed prior to issuance. The NRC also stated that these are issues that the Tech Spec Task Force (TSTF) should address. The industry had previously raised the examples to the TSTF.

### **GENERIC COMMUNICATIONS**

The NRC discussed activities associated with generic communications. The NRC is reviewing RIS 2005-29, Rev 1 and considering options for addressing the issue, including not issuing the RIS. The industry asked why the RIS associated with service life is still on the list for potential issuance. The NRC stated the inspectors have received training on service life, but management wants to ensure there is alignment on the decision to not issue a RIS. Regarding the potential RIS, "Functionality of Non-Tech Spec Support Systems as They Relate to Operability of Tech Spec Systems," the staff stated that this RIS is related to an issue addressed in a 2002 letter to the Perry plant. The NRC stated they will have more information to share with the industry on the topic of non-TS support equipment relationship to operability at the next RITF meeting.

## **HIGH ENERGY ARC FAULT GENERIC ISSUE**

NRC described the status of the High Energy Arc Fault (HEAF) Generic Issue (GI). There has been some industry operating experience in this area. The NRC conducted a 2-day workshop seeking input from the industry on its testing. The assessment plan for the GI is in concurrence and should be issued in a few weeks. Both small and large scale testing will be performed. The industry commented that the testing is not representative of actual plant configurations. For example, multiple protection devices need to fail for electrical faults to hold in for as long as 8 seconds when faults typically last milliseconds. NRC personnel stated they would ask the Office of Research if industry comments were incorporated into the test plans.

## **ROP TRANSFORMATION AND USE OF INPO PERFORMANCE INDICATORS**

The NRC stated that one of the ideas for ROP transformation was to take some data licensees collect for INPO performance indicators (PIs) and potentially use the information to offset some NRC inspections. This topic will be discussed in more detail during the next ROPTF meeting. The NRC expects to present ROP Transformation concepts to the Commission at the Operating Reactor Business line meeting in the fall timeframe.

For industry awareness, the NRC stated that they are considering a revision to an MOU with INPO to allow INPO personnel to be imbedded into NRC reactive inspections (inspections performed under MD 8.3) as a developmental opportunity. The purpose would be for INPO personnel to observe the methodology used by the NRC to conduct reactive inspections. NRC would seek concurrence from the host utility prior to inviting an INPO observer.

## **REGULATORY PERFORMANCE DASHBOARD**

The NRC and industry are maintaining regulatory performance indicators which were briefly discussed at the meeting. The NRC posts its indicators for the regulator's performance on the NRC website. The industry is also collecting indicators for a Licensing Dashboard to measure NRC performance. It is not clear that the industry and NRC are using the same assumptions to develop these indicators. There was discussion of a future interaction to better understand the assumptions behind the indicators.

## **TEMPORARY INTERFACE AGREEMENT (TIA) PROCESS**

The NRC is considering options for the future of the TIA process, including a replacement process that is more timely, efficient, and risk-informed. The industry took an action to identify principles that could be considered when developing a replacement process.

## **CONTROLLED UNCLASSIFIED INFORMATION (CUI)**

The NRC discussed implementation of the federal regulation for CUI. The NRC has an agency-wide working group developing a CUI policy for the NRC. Controlled Unclassified Information will replace

Sensitive Unclassified Information (SUNSI). The NRC stated that the impact to licensees will depend on the types and quantity of CUI they hold. The industry stated that it will continue to monitor implementation of NRC's CUI policy to identify any potential impacts to licensees. A public telecom on CUI had been previously scheduled for July 18.