Some things that come to mind:

1. Branch chiefs and staff have not yet been clear guidance on standards to be applied to the review. Specifically, any criteria used to screen out Tier 2* changes from requiring prior NRC approval must clearly demonstrate the change does not affect Tier 1-equivalent information (i.e., Tier 2* that meets the intent of the designation). Communicating that expectation is a prerequisite for providing schedule and resource estimates. Otherwise, people don't know what they are buying into.

2. The schedule milestones DNRL proposes are overly aggressive. For example, an RAI milestone should not be established until the standard for the review is defined, including management buy-in.

3. It is a bad idea to provide a schedule in the acceptance letter assuming a Commission paper will not be written. I personally think that decision should be made before the letter is issued.

4. Joe Colaccino's branch should be involved, given the effect this topic has on various bits of guidance (e.g., NEI First Principles, SRP, 50.59-like reviews, etc.). Traditionally, organizations like his have had active roles in similar topics, such as when 50.59 was revised in the late 1990s.

5. I think the proposed criteria are inadequate, as they are vague, somewhat redundant to 50.59, and (perhaps most importantly) do not clearly determine Tier 1 equivalence (plus, they aren't anything like the NEI First Principles). Given those considerations, I think we must assume at least 2 rounds of RAIs: one set to identify shortcomings in the initial proposal and a second set for clarifications and adjustments based on an improved set of criteria.

These are the first things that I've come up with. I'll let you know if I come up with anything else.

Joe

From: Segala, John
Sent: Tuesday, January 16, 2018 5:25 PM
To: Williams, Joseph <Joseph.Williams@nrc.gov>
Subject: Fwd: Question: NRO Schedule Milestones for Vogtle LAR 17-037

Thoughts?

-------- Original Message --------
From: "Habib, Donald" <Donald.Habib@nrc.gov>
Date: Tue, January 16, 2018 5:08 PM -0500
To: "Jung, Ian" <Ian.Jung@nrc.gov>, "Mitchell, Matthew" <Matthew.Mitchell@nrc.gov>,
"Lupold, Timothy" <Timothy.Lupold@nrc.gov>, "Samaddar, Sujit" <Sujit.Samaddar@nrc.gov>,
"Rivera-Varona, Aida" <Aida.Rivera-Varona@nrc.gov>, "Segala, John"
<John.Segala@nrc.gov>, "Jackson, Diane" <Diane.Jackson@nrc.gov>, "Karas, Rebecca"
<Rebecca.Karas@nrc.gov>

CC: "Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>, "Bradford, Anna" <Anna.Bradford@nrc.gov>, "Akstulewicz, Frank" <Frank.Akstulewicz@nrc.gov>, "Patel, Chandu" <Chandu.Patel@nrc.gov>, "Carpenter, Cynthia" <Cynthia.Carpenter@nrc.gov>, "Caldwell, Robert" <Robert.Caldwell@nrc.gov>, "Monninger, John" <John.Monninger@nrc.gov>
Subject: Question: NRO Schedule Milestones for Vogtle LAR 17-037

To: Branch Chiefs Reviewing LAR-17-037

Ian Jung (ICE)
Matthew Mitchell (MCB)
Tim Lupold (MEB)
Sujit Samaddar (SEB)
Aida Rivera-Varona (HOIB)
John Segala (ARPB)
Diane Jackson (SCVB)
Rebecca Karas (SRSB)

To develop a review schedule for the LAR, I need your input on key milestones **by COB Friday, 1/19**:

Assumptions
- The LAR will be accepted on 1/21

- While the decision to prepare a SECY paper is still pending, assume that SECY paper preparation would not affect the SER schedule (we will make a uniform assumption (e.g., +3 months, +6 months) to account for a SECY paper.

- **Please provide any other key assumptions support your schedule (e.g., 2nd RAI)**
  - [   ]
  - [   ]
  - [   ]

Milestone	Your Proposed Date
Date Tech Branch provides RAIs to DNRL (DNRL Proposes 2/23)	[ ]
Date Tech Branch provides SE input (if any) to DNRL (DNRL Proposes 5/4)	[ ]

Please contact me if you have any questions.

Thanks
Don

Don Habib
Project Manager
NRO/DNRL, Licensing Branch 4
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301-415-1035