### NRC Staff Notes of 6/27/19 Public Meeting with the Nuclear Energy Institute (NEI)

The information contained herein provides notes for the 6/27/19 public meeting with NEI. It does not represent any NRC staff or agency position.

## NEI's Suggested Changes to Core Inspection Program

Representatives from NEI discussed suggested changes to inspection manual chapter (IMC) 2600, "Fuel Cycle Facility Operational Safety and Safeguards Inspection Program," Appendix B, "NRC Core Inspection Requirements," as potential areas to gain efficiencies, and provided a general basis for each change.

Plant Operations, Maintenance & Surveillance, and Nuclear Criticality Safety
NEI suggested a reduction to the annual estimated resources for plant operations inspections and suggested combining maintenance and surveillance inspections into plant operations.
Additionally, NEI suggested a reduction to the annual estimated resources for nuclear criticality safety inspections. NEI referenced the maturity of the licensees' integrated safety analysis (ISA) programs, licensee performance review (LPR) results and compliance data, and the inherently low risk profile of the facilities.

#### Fire Protection

NEI suggested a removal of annual fire protection inspections and a reduction in the estimated resources for the triennial fire protection inspection, referencing similar rationale previously discussed and that many aspects of fire protection are covered by bodies other than the NRC (i.e., insurance companies).

#### Material Control and Accounting

NEI suggested a reduction in the annual estimated resources for material control and accounting (MC&A) inspections, referencing similar rationale previously discussed and the maturity of licensees' MC&A programs.

## Physical Protection and Information Security

NEI suggested a transfer of certain physical protection inspection resources to the Resident Inspector Program and a reduction in the annual resource estimate for information security inspections.

Radiation Protection, Environmental Protection, Waste Management, and Transportation NEI suggested a reduction in resources for radiation protection (RP), environmental protection (EP), waste management (WM), and transportation (TRANS) inspections by combining all of the inspections into a single biennial inspection, referencing similar rationale previously discussed and that the waste generation of the facilities is generally low.

# Emergency Preparedness and Plant Modifications

NEI suggested that the annual emergency preparedness inspection be performed biennially in coordination with the biennial exercise observation. NEI suggested that the need for the triennial plant modifications inspection be assessed after the first round of completion to determine whether it should be continued.