



# **TR Modernization Process Update**

Topical Report Transformation Working Group

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# Purpose

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**Bottom line:** the implementation of an integrated, combination of approaches to improve the timeliness of topical report (TR) reviews.

**Purpose:** Provide an overview of options, courses of action, and recommended path forward for TR process transformation.



# Background

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- Topical Reports in licensing
  - Not required
  - Single staff review of a safety-related topic
  - Low priority
- Most are new technology, methodology, or process
- Industry concerns about timeliness of reviews
- Budgeted resources for TR historically did not cover need
- TR Transformation Working Group established



# Current TR Process Observations

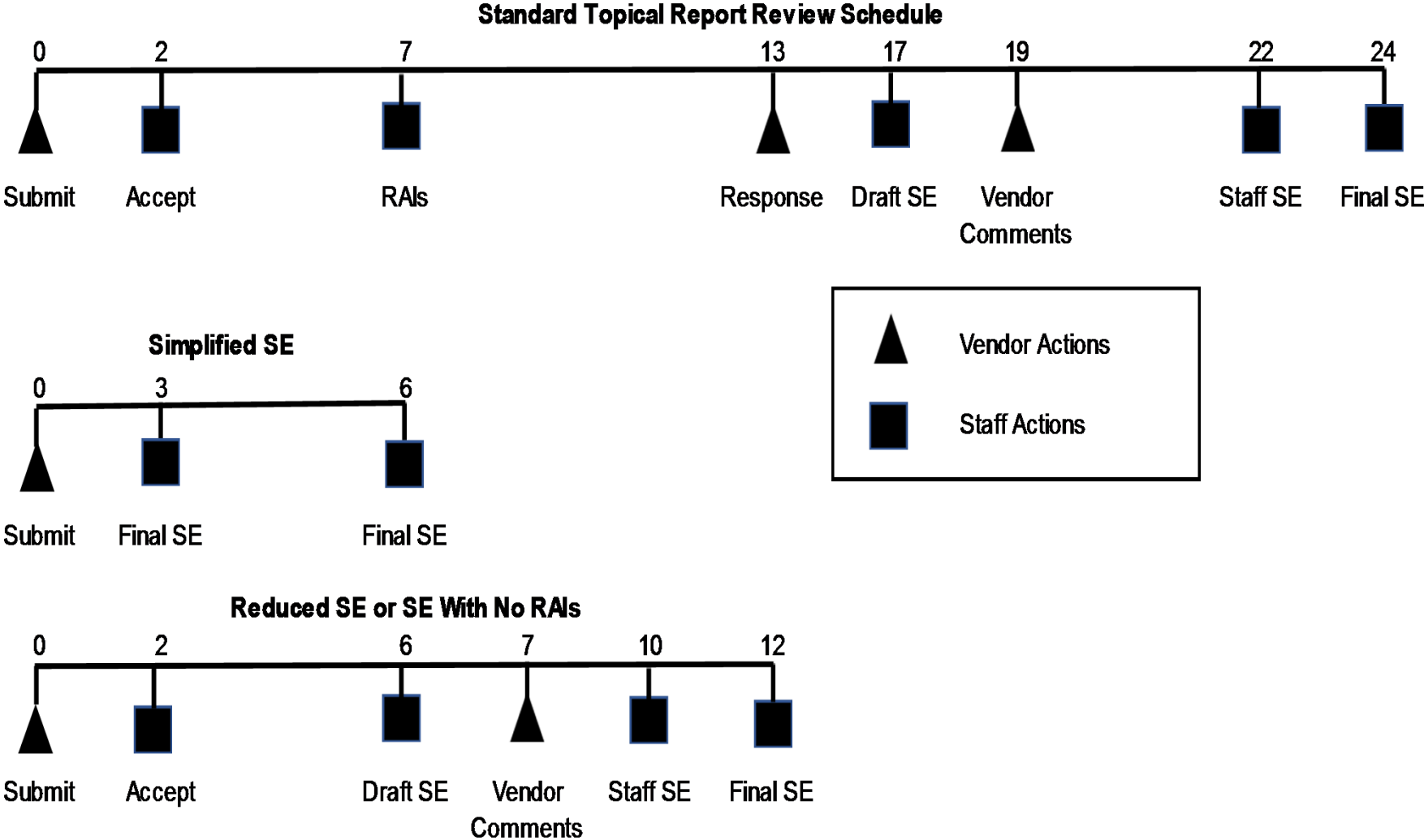
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- Same review regardless of
  - TR complexity
  - New topic or TR revision
  - Large or small TR
- Variations in TR
  - Vendor submissions can vary in quality
  - Staff resources required to complete the review
- Multiple rounds of RAIs are often needed to complete the SE

# List of Options

<b>Option</b>	<b>Brief Description</b>
Status Quo	No change in current process
Simplified and Limited SE	Standard form (3-4 pages) or reduced SE documentation
Modified Reviews	Accept or deny; Prepare draft SE with open items for vendor to address with RAIs in only minimal circumstances
Tiger team reviews	Perform on-site audit and prepare draft SE with open items
Submittal documentation	Not require RAIs for all information from vendors
Administrative process	Editing and administrative processes add time
Eliminate -A version	End review when final SE is issued
Dedicate Branches	Pre-assign dedicated staff to TR Review Branch

# Timelines for Current and Proposed Topical Reviews



# Analysis of Options

Option	Potential Time to SE	Pros	Cons	Recommend	Implementation Period
Status Quo	Varies, lengthy	<ul style="list-style-type: none"> <li>• Known process</li> <li>• Does achieve reviews</li> </ul>	<ul style="list-style-type: none"> <li>• Concerns about timeliness</li> <li>• Need to husband scarce resources</li> <li>• One size fits all</li> </ul>	Keep	N/A
Simplified and Limited SE	3-12 months	<ul style="list-style-type: none"> <li>• Reduce review time</li> <li>• Focus resources on risk significant TRs</li> <li>• Submit smaller changes which get reviewed faster</li> <li>• TR update process</li> <li>• Distinction based in TR complexity</li> </ul>	<ul style="list-style-type: none"> <li>• Difficult to establish the reduced scope.</li> <li>• Difficult to project appropriate SE</li> <li>• Challenging to limit staff hours</li> </ul>	Yes, pilot	Short term
Modified Review	12 Months	<ul style="list-style-type: none"> <li>• Vendor burden</li> <li>• RAIs are only issued if draft SE items not closed</li> <li>• Keeps schedule</li> </ul>	<ul style="list-style-type: none"> <li>• External pressures to continue work</li> <li>• Staff and vendor want TR</li> </ul>	Yes, pilot	Short term

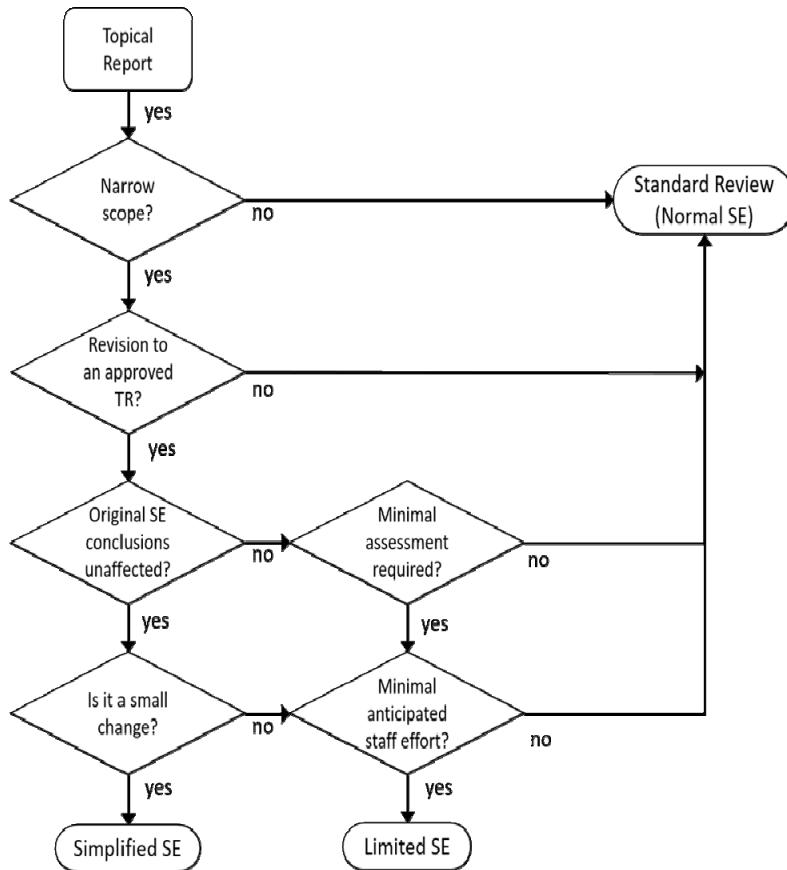
# Analysis of Options (cont.)

Option	Potential Time to SE	Pros	Cons	Recommend	Implementation Period
Tiger team reviews	12 Months	<ul style="list-style-type: none"> <li>• Draft SE complete</li> <li>• RAIs if needed</li> <li>• Shorter reviews</li> </ul>	<ul style="list-style-type: none"> <li>• Not all TRs</li> <li>• Need right TR and staff</li> <li>• Billing for travel</li> </ul>	Yes, Pilot	Short Term
Submittal documentation	Varies	<ul style="list-style-type: none"> <li>• Reduce RAIs</li> <li>• Significant time savings</li> </ul>	<ul style="list-style-type: none"> <li>• Potential confusion</li> <li>• Information tracking</li> </ul>	Yes	Short Term
Administrative process	Varies	<ul style="list-style-type: none"> <li>• Improve timeliness</li> <li>• Accurate budget</li> </ul>	<ul style="list-style-type: none"> <li>• AA staff overloaded</li> <li>• Priorities shift</li> <li>• Focus for cuts</li> </ul>	Yes	Short term
Eliminate -A version	None	<ul style="list-style-type: none"> <li>• Some resource savings</li> <li>• Time savings</li> </ul>	<ul style="list-style-type: none"> <li>• TRs could be changed</li> <li>• Review time not shortened</li> </ul>	No	N/A
Dedicated TR Branches	None	<ul style="list-style-type: none"> <li>• Establishes special teams</li> <li>• Avoids competing priorities</li> </ul>	<ul style="list-style-type: none"> <li>• TR workload may not justify</li> </ul>	No	N/A



# Recommended Combination of Options – Short Term

Establish a flow diagram and associated guidance in LIC-500 to enable to appropriate SE for each review.



- Simplified SE
  - no new regulatory finding
  - confirming previous NRC finding is still applicable.
  - minimal documentation (e.g., a few sentences)
  - 3 - 6 months to complete review
- Limited SE
  - new regulatory finding
  - finding is of very limited scope and requires minimal assessment.
  - some documentation (e.g., a few pages)
  - 6 - 9 months to complete review
- Normal SE: Current process
- Reduced documentation
- Administrative processes: Document processing and editing

# Path Forward

Activity	FY 2020											
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
LIC-500 Update #1 OGC Rule												
Pilot Simplified SE												
Public Workshop												
Pilot Reduced SE												
Admin Process Discussion												
LIC-500 Update #2												
- Write New Procedure												
-LT Review												
- Training (if needed)												
-Implmentation												

- Simplified SE Pilot
  - Digital I&C TR change (October 2019)
  - Second TR is being considered for pilot
- Reduced SE Pilot Submittal in October 2019
- Tiger Team review ongoing
  - March – Review began
  - September – Final Draft SE

# Simplified SE Standard Form Concept

Office of Nuclear Reactor Regulation Simplified Topical Report Safety Evaluation			
Topical Report Information		Review Information	
Report Number:		Division/ Branch:	
Title:		Project Manager:	
EPID:		Reviewers:	
Docket No.:			
Staff Hours:	Technical Reviewers Total	Project Manager	
Use of Simplified Safety Evaluation			
Is this the review of very limited scope?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
Is this a revision to an accepted Topical Report?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
Does the TR change maintain the original SE conclusions?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
Is this a small change?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
If any of the above questions are answered no, a simplified safety evaluation cannot be used.			
Applicable Review Guidance Used			
Description of Topical Report Content (1000 Word Maximum)			

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Office of Nuclear Reactor Regulation Simplified Topical Report Safety Evaluation	
Topical Report Information	Review Information
Report Number:	Division/ Branch:
Title:	Project Manager:
EPID:	Reviewers:
Docket No.:	
Technical Evaluation (Limited to space provided)	

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# Simplified SE Standard Form Concept (cont.)

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Office of Nuclear Reactor Regulation Simplified Topical Report Safety Evaluation			
Topical Report Information		Review Information	
Report Number:		Division/ Branch:	
Title:		Project Manager:	
EPID:		Reviewers:	
Docket No.:			
<b>Conclusions</b>			
<b>Conditions and Plant-Specific Action Items</b>			
Approval	Printed Name	Signature	Date
Technical Branch Chief			
PLPB Branch Chief			