

*The information contained herein provides notes for the September 12, 2019 public meeting. It does not represent any U.S. Nuclear Regulatory Commission (NRC) staff or agency position.*

### Building a Smarter Inspection Program Notes

On September 12, 2019, a Category 3 public meeting was held between NRC staff, representatives of NEI, and the public to continue to dialogue and idea sharing from previous meetings. The NRC staff discussed the concepts under consideration to enhance the fuel cycle inspection program and engaged with members of NEI and the public to solicit feedback. Several concepts currently under NRC consideration were presented, including the concept of a flexible program. The NRC staff emphasized that the primary factor in any potential changes to the fuel cycle inspection program is to ensure that the program remains risk informed, and performance based. The NRC staff also emphasized that the goal of the staff initiative is to right-size the inspection program consistent with the concepts of risk informed and transformative change, and that a specific target or percentage reduction in the inspection effort at the outset of this assessment was not established.

The following is a summary of the main topics of discussion during the meeting.

- Industry representatives suggested that the inspection program should provide credit to facilities with a robust Integrated Safety Analysis. More specifically, facilities should get credit (reduced inspections) for inclusion of additional Items Relied on for Safety that drive down risk (e.g., from the licensee's definition of highly unlikely definition of -4 to a voluntary -6).
- Senior Resident Inspector (SRI) Program: Industry representatives suggested that 180 hours of inspection effort for the performance area of Nuclear Criticality Safety (NCS) isn't justified for facilities with SRIs. Specifically, it was stated that the NCS are stable and mature at the facilities and consideration should be given to the reviews performed by the SRI that encompass NCS areas.
- The NRC staff urged industry representatives to provide feedback on criteria that could be used as for the allocation of flexible hours on the Option 1. The NRC staff provided a detailed discussion on the basis and development for the schedule of Option 1 and indicated that a 5-year inspection schedule would be developed and provided to each licensee with the hours per performance area. In addition, the staff clarified that the allocation of inspection hours per performance area could be reassessed every 2 year using the Licensee Performance Review process.
- Industry representative also suggested the NRC staff should provide credit for fire inspections performed by the Fire Marshal and other State organizations.
- URENCO USA suggested NRC to consider licensee's commitments to a Corrective Action Programs (consistent with NRC Regulatory Guide 3.75) and to provide credit for having commitments in the licensing basis for robust programs that increase safety at the facility
- URENCO USA suggested that the Problem Identification and Resolution inspection procedure should be added to the IMC 2600 App B table. Industry representatives also

suggested the Material and Accounting observation 'inspection' should be added to the IMC 2600 App B table.