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Subject: [External_Sender] Draft COM-106 review
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February 11, 2020

Booma,

We would like to thank you for making available draft COM-106, Revision 6, "Technical Assistance Request (TAR) Process." We understand from your memo dated December 5, 2019, summarizing the November 7, 2019 public meeting (ML19329B485) that public comment is not requested at this time as the draft revision is undergoing internal reviews and will be updated based on that feedback. We did want to provide some general comments and questions as soon as possible so that you and your team would have a chance to consider prior to the next opportunity for public interaction. We broke those out in two parts, Part One, Process Flow, and, Part 2, Safety Significance Screening. Please review and consider as appropriate. No formal response is needed; these would be areas that we would want to discuss at a future public interaction. Thank you for your consideration and I am looking forward to the next public interaction as you get closer to implementation.

Comments:

PART ONE, Process Flow-

1. Overall, the draft COM-106 flows well and should alleviate the timeliness concerns expressed by both the NRC staff and industry on how long an issue remains open and unresolved. The process flow path appears to meet the objectives as described in the document.
2. We believe that having provisions for exceptions (e.g. high public interest) could undermine the intent of the process if the safety significance is low but we appreciate the additional process clarity around office director approval for these examples. We would be interested seeing an example that falls into this category.
3. Page 7 references a monthly "TAR status report." Will this be publicly available?
4. It appears that a TAR could be closed out three ways;
 - a. Issue is resolved including response to the requesting office;
 - b. A recommended referral is made to another process;
 - c. The issue is recommended for no further action based on safety significance and other criteria.

We are interested in the various ways that these outcomes will be documented and if they will be publicly available

5. On page 30, section 4.14, we understand that; "resolving requesting office disagreements on TAR results" is under consideration for inclusion in the document. We

believe that having this section would be beneficial to completeness of the overall TAR package.

6. In the change history on page A2, will there be training and rollout in the regions beyond a DORL PM briefing?

PART TWO, Safety Significance Screening -

1. We agree that the reinforcement in the process to avoid new and detailed analytical studies or experimentation solely to influence the safety screening and highlighting that the analysis is not a SDP analysis will help prevent excessive analysis when trying to determine if an issue is low safety significance. This will be a key element during process briefings and training.
2. We believe having the background and basis in support of the "TAR Safety Significance Determination – Quick Reference Guide" is helpful. It does however contain a lot of information that could cause an increase of time and resources if process familiarity is low.
3. Table 1, for suggested workflow is beneficial in establishing expected timeline expectations to maintain resource demands at a reasonable level. It is important that this table be adhered to.
4. We support the reference to the EPRI document on Integrated Risk Informed Decision Making as it provides/describes the very aspects NRC is trying to achieve using the integrated team process.
5. We believe that if after 10 to 20 hours, a safety significance screening is determined to be "indeterminate," it will impact the use of resources and reduce the effectiveness of the process. We recommend that an outcome of "indeterminate" should be used as a last resort and efforts to reach a conclusion on an issue's safety significance is strongly encouraged.
6. We are interested in more discussion around the discussion of indefinite exposure time and how that will be factored into determining safety significance, increased plant risk.
7. The team appreciates the identification of the preferred approach for Sections B, C, and D. Consider under section C, listing C3, LIC-504 above C2, 50.69 categorization as the alternative approaches for safety margin.
8. More guidance appears needed to help with what should be considered when filling out issue description under Section A, "Additional Issue Complexities" to reduce subjectivity.
9. Similar to what was shared previously, the complexity of the safety screening determination may make it difficult to yield results of low safety significance for issues that are low safety significance when trying to determine calculated values or risk, assessing safety margins, defense in depth, and performance monitoring. We also feel that there should be an increase in both the likelihood and consequence to determine that an issue is above low safety significance when using the risk triplet.
10. The elements B through E as shown in the overview of the workflow process appear additive and do not appear to be elements of an integrated determination of low safety

significance.

11. Our perspective is that Appendix D should state some of the fundamental elements of the safety determination, namely, that it is intended to be a resource discriminator using safety insights to drive the application of Agency resources and is not a risk evaluation of the condition or issue. It involves integrating the insights from risk and safety margin and defense-in-depth together to come to a conclusion.

Sincerely,

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