

Overview of Internal Stakeholder Feedback

(Received during COM-106, Rev. 6 development)

- Considering safety significance early in the process with added screening mechanisms, and tailoring the expenditure of resources to be commensurate with that safety significance and clear documentation;
- Engaging early and routinely throughout the process with the requester to ensure that the question remains well-posed (e.g., they are not broad or speculative), and that the ultimate response is appropriately focused on answering the accepted questions with streamlined response templates;
- Improving guidance to allow for some issues with generic aspects to enter the TIA process;¹
- Assessing early in the process whether an issue truly belongs in the updated TIA process, versus rightfully belonging in a different agency process (e.g., back fitting, generic issue program), as well as providing guidance to assist in effectively documenting this determination and efficiently referring or handing-off to another process;
- Using an integrated or tiger team concept to evaluate and resolve requests timely;
- Promoting earlier involvement of the Office of General Counsel, specifically to help with the legal aspects of the questions (e.g., disputed facts in the context of a licensing basis issue) and for early alignment on the path forward;
- Addressing more explicitly the inconsistencies in the agency interfaces with external stakeholders, particularly the licensee, where the request is related to an ongoing regional inspection activity, including effective consideration of licensee inputs in the process;
- Enhancing the timeliness of the program;
- Providing a clear exit path to requests that are not resolvable within a reasonable expenditure of resources;
- Escalating and tracking of issues when an impasse has been reached amongst the involved staff;
- Leveraging information technology advances to make responses to past requests more easily accessible and searchable (e.g., modernize internal SharePoint site TIA databases), and clarify the documentation needs for searching past precedents; and
- Generally restoring Regions' confidence that the process can be effective and expeditious.

¹ The COM-106 overhaul WG considered this feedback, however, the revised TAR process continues to be for plant-specific issues only.