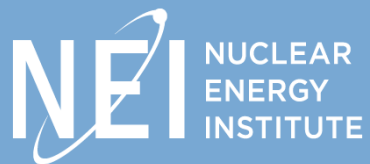


Industry SLR Lessons Learned

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AGENDA

- PRE-SUBMITTAL ACTIVITIES
- SUFFICIENCY REVIEW
- OPEX AUDIT
- IN-OFFICE AUDIT
- REQUEST FOR ADDITIONAL INFORMATION
- PART 51 ENVIRONMENTAL
- SUMMARY

Pre-Submittal Activities

- NRC-Industry SLR phone calls have been effective to increase applicant understanding of SLR related issues
- Pre- application meetings 6-12 months prior to submittal were a useful forum for common understanding of important issues to be addressed in the SLRA
- Assignment of the NRC PMs well before the LRA submittal date is helpful
- Industry suggests assignment of only 1 Safety PM to reduce costs or 2nd Safety PM is classified as “In-Training”

Sufficiency Review

- Costs associated with the Sufficiency Review are significantly higher than first license renewal (FLR)
- Several Tech Staff reviewers may have started the technical reviews during the Sufficiency Review based on man-hour reports
- Industry recommends that the assigned PMs complete the SRP Checklist since this is an administrative review and not a technical review

OPEX Audit

- The OE audit setup used for the Lead Plants was extensive and expensive. It is not clear if the desired benefit for this effort was realized
- An established and refined set of search terms (e.g. 30) needs to be established to eliminate unproductive time during the development of the SLRA and the OE Audit
- Reduce OE range to 5 years in lieu of the current 10-year range
- Based on the Lead Plants OPEX audits, consider having a smaller sub-set of NRC staff (e.g. 1 or 2 staff) work at the station (or the corporate office) to minimize expense burden of remote audit location
- Industry proposes closing E-Portal access to OPEX information following issuance of the NRC OPEX Audit Report or 60 days following Audit completion.

In-Office Audit



- The conduct of the In-Office Audit remotely was effective and more efficient than the model used in FLR
- Use of the E-Portal improved and focused the NRC Staff's review of Applicant support information. However, there may be too much information and should be evaluated
- In-Office Audit session schedule development should be developed with Applicant input prior to issuance and available 4 weeks prior to start of breakout sessions
- Consider a graded approach to the In-Office Audit - AMP breakout sessions and prioritize based on:
 - Reduction of time on previously approved Fleet AMPs
 - Coverage by current regulatory oversight process
 - Number and complexity enhancements (none, few, many)
 - Significance and occurrence of operating experience
 - Exceptions: standard (e.g. head bolts), configuration, CLB

In-Office Audit (continued)

- Earlier engagement on TLAA topics in audit schedule is critical to allow additional time if outside vendor support is needed
- Timely question availability is essential to best breakout session outcomes (no follow-ups, focused RAIs, etc.)
- Last week of breakout sessions should be reserved to address follow-up questions or provide follow-up information.
- Use of Clarification Calls is viewed as critical to the overall success of the In-house audit

In-Office Audit (Breakout Sessions)

- NRC draft questions would benefit from standardization
 - Fire Water questions are a good model (timeliness, OE, content, background, AMRs, etc.) – i.e., Mechanical Reviews
 - Note efficiencies of NRC Electrical Team Review
- Propose use of E-Portal to post questions and provide follow-up
- Skype was helpful to orient reviewers to information but not always available for all the break-out sessions
- Use of various input methods (i.e. Supplement, 4D, RAI) for issues was good use of resources
- Close Portal following issuance of In-house Audit Report

Request for Additional Information (RAI)



- Draft RAI discussions very beneficial and focused
- Periodic conference calls were very important in maintaining open lines of communications
- Clarification call participation should be minimized to those that are directly involved in the issue
- Time period from initial topic review until official RAI of 3-4 months seems excessive
- Consider use of E-Portal information during In-Office Audit to provide issue clarity for use in SER without the need for RAI
- Combining the ACRS Full/Sub-committee together if the SER has no Open Items

Part 51 Environmental

- Efficiency improvement measures recommended for On-site Environmental Audits
 - More timely delivery of NRC questions/audit needs list to allow pre-Audit preparation of responses
 - Better definition of tour needs to improve planning for tour content and resources
 - Use of Environmental Assessment process

Summary

- Reducing number of assigned PMs
- Streamlining the Sufficiency Review process
- Clarifying the purpose and needs during the OE Audits
- Prioritizing the In-Office Audit reviews based on a graded approach for AMPs
- Standardizing NRC Audit questions to improve meeting efficiency
- Improving the In-Office Audit session scheduling
- Continuing to use all methods of transmitting information in support of SER development
- Timely availability of NRC questions is essential to ER review
- Consolidating ACRS Full/Sub-Committee meetings with a SER with no Open Items