

SPENT FUEL STORAGE AND TRANSPORTATION ISSUE RESOLUTION PLAN

Issue Number: I-20-05

Performance Margins Recommendation: II-1 (Cat 2)

Rev. 3.26.2020

Note: This document is DRAFT and the positions noted therein are preliminary NRC staff positions. This DRAFT is being made publicly available to support discussions at an April 2020 public workshop.

Title: Develop acceptance review grading process that would assign varying levels of review to an application based on risk insights.

I. Summary of Resolution Plan

The NRC staff is evaluating an industry recommendation, Recommendation II-1 in the Nuclear Energy Institute's (NEI's) Spent Fuel Performance Margin White Paper Agencywide Documents Access and Management System (ADAMS) Accession No. ML19318D971), where licensing applications would be assigned varying levels of review depending on risk insights. This recommendation to grade licensing applications would require NRC to develop an internal review guidance.

Prior to receiving NEI's Spent Fuel Performance Margin White Paper, NRC staff had already been developing a process to grade licensing applications with the goal of improving efficiency. This proposed process considers risk insights from risk studies and from other insights from staff subject matter experts who have extensive knowledge in reviewing licensing applications (e.g., complexity, quality of application).

The NRC effort will include public meetings for sharing information with stakeholder (i.e., industry and public) at development intervals as appropriate. The developmental activities include the following steps:

- Development of a high-level grading process
- Form a working group (WG) of senior staff reviewers encompassing all the licensing technical areas
- WG evaluate acceptability of the proposed process and grading criteria
- Collect and resolve comments and suggestions from WG and work with developer for resolution
- Conduct a public workshop to discuss draft process with stakeholders
- Evaluate and incorporate, as appropriate, the feedbacks from stakeholders
- Pilot the approach on license applications
- Conduct WG review of results of pilot applications
- Conduct public meetings to inform stakeholders
- Complete NRC review guidance and maintain it as a "living document" to include new insights

II. Proposed Actions and Due Dates

ACTION	RESPONSIBLE PARTY	DUE DATE
1. Develop a draft approach for grading and review levels for licensing applications	NRC	Done
2. Form WG for evaluation	NRC	Done
3. Collect and resolve comments and suggestions from WG and work with developer for resolution	NRC	On going
4. Conduct a public workshop to discuss draft approach and receive feedback from stakeholders	All	April 2020
5. Resolve issues and comments on criteria for grading the levels of review	NRC	July 2020
6. Draft detail criteria for grading levels and identify possible conservatisms and non-conservatism in the grading process and how these could be resolved	NRC	September 2020
7. Conduct public meeting to present revised draft guidance	All	October 2020
8. Select pilot application to test acceptance review grading process.	NRC	October 2020
9. Gather lessons learned on the pilot review	NRC	TBD
10. Conduct a public meeting to review lessons learn/modify process as needed	NRC	TBD
11. Develop NRC review guidance to incorporate acceptance review grading process	NRC	TBD
12. Hold public meeting on draft guidance	NRC	TBD
13. Finalize review guidance and utilize for upcoming reviews	NRC	TBD
14.		
15.		