

JANET SCHLUETER
Sr. Director Fuel and Radiation Safety

1201 F Street, NW, Suite 1100
Washington, DC 20004
P: 202.739.8098
jrs@nei.org
nei.org



May 6, 2020

Ms. Andrea Kock
Director, Division of Fuel Management
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Follow Up Input to NRC April 22, 2020, Public Meeting and Supplement to NEI's March 17, 2020, letter on Final Working Group Reports on the Smarter Program Inspection and Licensing Program Enhancement Initiative

Reference No: 689

Dear Ms. Kock,

This letter is sent on behalf of the Nuclear Energy Institute¹ (NEI) and its fuel cycle facility members. We appreciate discussions between U.S. Nuclear Regulatory Commission (NRC) staff and industry representatives during the April 22, 2020, NRC public meeting on fuel cycle facility-related regulatory matters. During the meeting, you referred to the March 17, 2020, NEI letter to you on the Smarter Program initiative wherein we offered a list of inspection program elements that would benefit from continued public discussion. You suggested we prioritize that item list. As such, we binned them into "High, Medium and Low" priority categories. It should be noted that we fully support implementation of inspection program improvements--in calendar year 2021--as identified by the Working Group and as determined by NRC management. We are not suggesting, nor do we recommend, that NRC suspend those efforts to address these additional program elements. Instead, we look forward to continued public discussions on the following topics which might yield further program enhancements that would be implemented at the appropriate time.

High: Chemical Safety

High: Safety Margin² - Current Inspection Guidance; Credit for Increased Margin

Medium: Credit for NRC-approved Corrective Action Program and Frequency Reduction for Tier 1 Areas with NRC-approved Corrective Action Program

¹The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

² A related separate NEI letter is forthcoming to offer specifics on the need for further industry-NRC discussion

Andrea Kock
May 6, 2020
Page 2

Medium: Current Exclusion of Specific Program Areas

Low: Resident Inspector Utilization

Low: Preparation for and Documentation of Inspections

I would be pleased to answer any questions NRC might have on the content of this letter, and work with you and Ms. Suggs of Region II to further prioritize them and set dates for public meetings.

Sincerely,

A handwritten signature in cursive script that reads "Janet Schlueter".

Janet Schlueter

c: John Lubinski, NRC/NMSS
LaDonna Suggs, NRC/RII/DFFI