



## **2.206 Petition Review Process**

### **Public Meeting**

**August 18, 2020**

# Meeting Purpose

- **The purpose of this meeting is to discuss and obtain public perspectives on proposed revisions to the 10 CFR 2.206 petition review process based on the IP Gas Transmission Lines' Expert Evaluation Team's recommendations**
- **Staff actions to improve the 2.206 petition review process include proposed revisions to the NRC's MD 8.11 and Desk Guide for 2.206 petition reviews**

# Agenda

- **Background**
- **Expert Evaluation Team Recommendations and Proposed Staff Action**
- **Other Staff Proposed Improvements**
- **Path Forward**
- **Stakeholders' Feedback**

# Background

- **NRC Inspector General's (IG's) Event Inquiry titled "Concerns Pertaining to Gas Transmission Lines at the Indian Point Nuclear Power Plant" (Case No. 16-024)**
- **EDO tasked an Expert Evaluation Team to address the IG's report**
- **Expert Evaluation Team reviewed the NRC staff analysis of the pipe rupture and developed recommendations to improve analyses and practices in several areas, including the 2.206 petition review process**
- **A 2.206 staff working group (WG) was formed and tasked to address the expert team recommendations**

# **Expert Evaluation Team Recommendations and Proposed Staff Action 1/4**

- **Expert Evaluation Team Recommendation:**
  - **Modernize Petition Review Boards**
    - **Designate standing members for certain roles**
    - **Centralize the 2.206 process to improve consistency and effectiveness**
- **Proposed Staff Action:**
  - **Centralize 2.206 petition project management**
    - **2.206 petition managers would be full time tasks for designated staff**
    - **This would promote consistency in the process**
  - **Designate certain roles as standing members of the PRB**
    - **Technical staff would still be drawn from the office for which the petition relates**
    - **SES manager to serve as PRB chair would be selected from a small pool of managers that would have additional training**
    - **Would permit PRB selection to maximize independence from original decision**

# **Expert Evaluation Team Recommendations and Proposed Staff Action 2/4**

- **Expert Evaluation Team recommendation:**
  - **Provide for Independent Petition Reviews**
- **Proposed Staff Action:**
  - **To the extent practicable and if and when necessary, assign staff to the PRB that, are independent from previous staff decisions on the issues raised in the petition**
  - **Staff previously involved will continue to provide historical and technical input to the PRB**

# **Expert Evaluation Team Recommendations and Proposed Staff Action 3/4**

- **Expert Evaluation Team recommendation:**
  - **Accept petitions for review if detailed analysis will be needed to review the issues raised**
- **Staff Proposed Action:**
  - **Consider changes to the Management Directive and Desk Guide to accept the petition if it is determined that a detailed analysis would be required to complete the initial assessment**
  - **Consider if updating the Management Directive and Desk Guide to provide additional information on status to the petitioner, throughout the review process would address this concern**

# **Expert Evaluation Team Recommendations and Proposed Staff Action 4/4**

- **Expert Evaluation Team recommendation:**
  - **Any staff analysis or calculations used to support a 10 CFR 2.206 petition decision should be rigorously documented**
- **Staff Proposed Action:**
  - **Make changes to the Management Directive and the Desk Guide to provide specific documentation steps**
  - **Focus on documentation of the information needed to support key decisions (i.e. acceptance of the petition or recommended decisions)**



## **Other Staff Proposed Improvements**

- **Improve and simplify the 2.206 petition screening criteria**
- **More complicated petitions with multiple concerns and action requests may benefit from a holistic review that considers the requested actions in the aggregate, and ensures that the cumulative impact of the petitioner concerns have been evaluated**

# **Path Forward**

- **Compile feedback from public and internal stakeholder input**
- **Gain approval for the changes in the process**
- **Revision of the process and guidance documents**
- **Complete revision and get concurrences**
- **Provide training on the new process**

## **Stakeholders' Feedback**

- **Do you have any questions or feedback on the proposed staff actions that are specific to the areas of interest identified by the Expert Evaluation Team?**
- **Do you think the proposed changes will improve the process?**
- **Are there other areas that could be improved?**
- **Are there any gaps in the process that can challenge implementation?**
- **Are there unintended consequences of these changes?**

# **Additional comments may be sent to:**

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