

Official Transcript

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(NEI) and Industry Re: Task Interface
Agreement (TIA) Program Enhancement

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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PUBLIC WEBINAR WITH THE NUCLEAR ENERGY INSTITUTE
(NEI) AND INDUSTRY RE: TASK INTERFACE AGREEMENT
(TIA) PROGRAM ENHANCEMENT

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DISCUSSION OF COMMENTS ON UPDATED DRAFT GUIDANCE

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MONDAY,

JULY 27, 2020

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The Webinar convened via Video
Teleconference, at 1:30 p.m. EDT, Booma Venkataraman,
Moderator, presiding.

NRC STAFF PRESENT:

BOOMA VENKATARAMAN, NRR DORL, Moderator

PAUL CATALDO, Region 1

RAY KELLAR, Region 4

TIM REED, NRR DORL

NANCY SALGADO, NRR DORL

ALEX SCHWAB, NRR DRA

GEORGE SMITH, NMSS

GREGORY SUBER, NRR DORL

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JENNIFER TOBIN, NRR DORL

ALSO PRESENT:

VICTORIA ANDERSON, NEI

STEVE CATRON, NextEra

STEPHANIE PYLE, Entergy

TIM RITI, NEI

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TABLE OF CONTENTS

Introductions/Logistics.....4

NRC Overview Presentation.....6

Discussion of Comments on Draft COM-106.....25

Public Comments.....52

Discussion of Comments on Draft COM-106
 (Continued).....56

Public Comments.....66

Conclusion/Summary.....67

Adjourn.....72

P R O C E E D I N G S

1:31 p.m.

MR. SMITH: Good afternoon, everyone. Welcome. Thank you joining up, joining us for this and for your interest in today's public webinar. My name is George Smith from the NRC's Office of Nuclear Materials Safety and Safeguards. I will be serving as your facilitator for today's meeting. My role is to help ensure that today's meeting is informative and productive.

The purpose of this meeting is to discuss public comments on the updated draft on the NRR Office Instruction COM-106 for the enhanced TIA or TAR process. That was made publicly available for the NRC staff to facilitate a discussion with NEI, industry and members of the public. We will focus on the portion of the draft process that directly involves interactions with external stakeholders.

This is a Category 2 meeting between the NRC and industry, but the public is invited to participate at designated points identified in the agenda.

Before I keep -- before I go on, I would ask everyone to make sure, if you're a panelist, that

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you're muting -- thank you.

Okay, any questions not related to the meeting topic will not be addressed at this meeting. However, if you could reach out to the NRC's Office of Public Affairs --

(Simultaneous speaking.)

MR. SMITH: -- by submitting a question via NRC public website using the About NRC tab, then selecting Contact Us. Again, I'd ask, if you're a panelist, you have the opportunity to mute or unmute yourself. So I am asking that everyone mute themselves.

(Pause.)

MR. SMITH: As you are aware with the COVID-19 situation, the NRC is currently operating in a flexible telework status, where the majority of us are working remotely. We're conducting this meeting using Webex. So we would appreciate your patience if we encounter any technical difficulties. This meeting is being recorded by a court reporter. The transcripts of the meeting will be made publically available and included with the meeting summary. Please speak clearly so your feedback will be accurately documented. As we go through the

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presentation today, the attendants will be muted. Attendees can use the raise-hand function to be unmuted by the host if they have a question.

Through the public question and answer portion at designated points of this meeting, members of the public can raise their hand to alert the host if they have a question and to be unmuted. Participants who are not attendees on this webinar are designated as panelists. The panelists for this meeting are primarily members of the NRC's Task Interface Agreement Revitalization Working Group, and a number of NEI and industry participants. The panelists can speak any time. Panelists can mute and unmute themselves when needed.

Again, just as a friendly reminder to the panelists, please go on mute when you're not speaking.

This will reduce the background noise. I would now like to introduce Booma Venkataraman, Project Manager at NRC's Division of Operating Reactor Licensing. Booma?

MS. VENKATARAMAN: Hello -- good afternoon. Can you hear me? Just to give me a sound-check, please?

MR. SMITH: We can hear you, Booma.

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MS. VENKATARAMAN: Wonderful. My name is Booma Venkataraman. I am a licensing project manager in the Office of Nuclear Reactor Regulation. I am also the coordinator for the Task Interface Agreement, or the TIA program, which is being enhanced and rebranded as a Technical Assistance Request, or TAR, process.

Now in this -- we appreciate your patience in this webinar. And rather than go and introduce everyone attending, our preference is to ask that you provide your name, introduce yourselves and provide your affiliation as you speak. We plan to pull the names of the attendees from Webex. And Jenny Tobin and George Smith are our gracious hosts, helping with this webinar. If you are participating by telephone only and were not able to access the Webex and would like to be included in the list of attendees, please email me. My email is booma.venkataraman@nrc.gov. And my -- my email address's spelling -- you can get it from the meeting notice. And the list of attendees will become part of the meeting summary that will be made publicly available.

No regulatory decisions will be made at today's meeting. Webex shows us -- allows us to show

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video. And by the way, the video is completely optional here. And then you will have presentation slides. But there will be no chat function on this particular one because we are recording with a court reporter. Meeting presenters, as George alluded to, will be labeled as panelists. And others join as attendees. And so then we can show our videos, but with the bandwidth issues, we may stop the video.

Now what we will do is, as we move forward and when we go to the discussion portion, we will make sure that all the panelists are all there, and whether they're attendees, we will check one more time.

So here as we move to the next slide, number 2, which is our agenda. The proposed flow of the webinar. We'll be following this. Also, if you see, we have online our meeting notice. And we publish the estimated timeline. We'll be following that, and we conclude no later than 4:30 p.m.

We included some time for -- you know, because of the technicalities, and also because of the dynamics. So -- but our idea is to finish no later than 4:30 p.m. We plan to take public comments at 2:40 p.m., approximately, and then at 3:35 p.m. Again, this will all depend on how the flow goes and

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how long it is. Now we will be starting the business portion of the meeting. I would like to invite Gregory Suber, Deputy Director, Division of Operating Reactor Licensing, to provide opening remarks.

(Pause.)

MS. VENKATARAMAN: Gregory, are you on the line?

MR. SMITH: So, Gregory has raised his hand, so let me -- perhaps he needs to be unmuted. Let me --

(Pause.)

MR. SMITH: I don't see him at this time, but he's --

(Pause.)

MR. SMITH: Okay, Greg, I think you're -- you're unmuted now. Can you hear us?

MR. SUBER: All right -- can you guys hear me?

MR. SMITH: We can. Sorry about the delay.

MR. SUBER: Okay, no problem. Hey, thank you -- thank you for your participation in this process. We know we've had several touch-points. That's because we want to go ahead and move in the

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very transparent way in making this transition and have it be as open and collaborative as possible. So we try and set up this presentation. We hope that is informative and we look forward to hearing some of the discussions in the opportunity to comment.

As Booma has already stated, this meeting will be transcribed and the transcription of this meeting will be publicly available once we get it from the court reporter and will serve as agency record for this undertaking. So I am not going to take up anymore of your time. We hope that your engagement will make this process -- which we believe has already been, you know, thoroughly improved by the initial efforts -- to be further refined by your comments today. Thank you very much.

MS. VENKATARAMAN: Thank you, Gregory. And thank you George and Jenny. You're doing a wonderful job with this. I know this technology can be something. So, with this, I am going to now invite NEI, if you have any opening remarks.

MR. RITI: Good afternoon. This is Tim Riti, Senior Project Manager, Regulatory Affairs at the Nuclear Energy Institute. We know that COM-106 is an important tool for the NRC to help resolve issues

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that could be brought up during regional inspections or other areas that could relate back the licensees. We appreciated the opportunity to provide feedback on areas that may help the process to flow and support timely disposition of issues either through the TAR process, or referring them to more appropriate processes when applicable.

We also appreciated the opportunity to meet with the staff in our public workshop to discuss examples, gaining content development, safety-significant screening and workflow. And we look forward to this discussion today, to be gaining additional insights and ask follow-up questions prior to implementation. Thank you.

MS. VENKATARAMAN: Thank you Tim. At this moment, would representatives from NextEra or Entergy -- like to make any remarks?

MR. CATRON: Thank you so much. This is Steve Catron with NextEra Energy. NextEra also welcomes the ongoing dialogue on this important process. We appreciate the opportunity to continue to participate in discussions and we do intend to actively be participants in this because we find it to be an important and valuable tool in the ongoing

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communications between the industry and the NRC. That's really all that I had to say for opening remarks. Thank you.

MS. VENKATARAMAN: Thank you, Steve. And for Entergy, if anyone would like to make any opening remarks?

Okay. Hearing none, now I am going to move to slide number 3. Now, for the people -- I know some of you are joining on the phone. If you are not able to see the slides, please go to the public meeting notice. The slides, as well as the documents, they are attachments. You can click them and open them up on your computer. So, just to let you know. So now we move to slide number 3.

The TIA, the Technical Interface Agreement, TIA Revitalization Effort, now rebranded as TAR, is being redesigned as a fact-gathering exercise that informs NRC processes such as inspection, enforcement and backfit. It is NRR's internal process to offer information assistance to other NRC organizations and this enhancement is expected to offer a graded, risk-informed approach to screen, scope, and evaluate potential TAR issues with early alignment on the path forward. The effort is intended

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to result in an efficient process that better focuses resources on matters that are more important to safety, more effectively utilizes modern tools, and as a result, better serves the needs of stakeholders. It incorporates feedback from both internal and external stakeholders, and their practical lessons learned.

The enhancement efforts worked in close coordination with the agency's overarching, low-safety significance issue resolution initiative. And the other component here is the integration of the construction TAR process fully to merge into this one NRR COM-106 product. I am going to go to slide number -- excuse me, slide number 4 here.

So the journey for this project -- for the Working Group began January 31st, 2019 -- to look into the lessons learned. And many of you may know the scenic journeys of the past TIAs. To do what? To infuse vitality into the program. Historically, most of the questions fielded by the TIA program came from the regions, specifically questions related to plant-licensing bases, and many of them were in the realm of very low safety significance. Because the answers to the licensing basis questions may directly impact the licensee, the licensee modifications -- the plant --

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timely stakeholder engagement and tapping into stakeholder perspective is of paramount importance. Thus we had a number of public engagements with NEI and industry, including one on November 7, 2019 with tabletop illustrations and walking through the process -- you know, step by step.

Even though this is an internal process, because of the intricacies and because of these interfaces with the stakeholders, and this, we shared the draft guidance with the industry -- first as an interim guidance for awareness, and later on July 9th for public comment. So this -- this document that we are going to talk about today, that was issued on July 9th, incorporates all internal stakeholder feedback and insights that you provided. So the -- this forum is an opportunity for you, external stakeholders, NEI, industry, and members of the public to provide comments on the draft guidance. And our next step is to finalize the guidance after considering comments appropriately.

So now we are going to move to the next slide. So, many of you may have seen this picture. This is a refresher. So this is a major modification. What does it give us? We have a three-phase graded

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approach commensurate with significance of the issue.

And we have integrated the construction TAR process.

If you can see the moving of my mouse at the bottom of the screen.

This is a simple process. Three simple steps: intake, screening and evaluation, and in-depth review. And it's a streamlined process. Streamlined why? Because in the guidance, enhanced timeliness -- so you see that's eight-hour intake, 30 days screening and evaluation, 80-day in-depth review. And then there are integrated teams in action, and a novel safety significance determination tool. The integrated team allows early alignment, effective scoping, effective framing of questions, and synergies are built in because the requestor, the region, is a part of the integrated team. And there is enhanced licensee engagement at every step here. And then there is consideration for licensee's voluntary input and the licensee is kept informed throughout the process.

And there are new templates and tools. And ultimately, the TAR provides a referral, a response or recommendation. And that's for information only. As we say, it informs decisions or

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actions in the requestor's processes, whatever it is, inspection or enforcement, or it could be backfit. And the TAR does not take a decision on its own, or take an action on its own. With that, I go to slide number 6.

Now we are going to shift gear here, shift gears and move to depict something integrated here. Remember, TAR is a process that helps other processes.

But it also interfaces with processes effectively with this upgrade. That's what we are going to look at and highlight. So here are three processes that are working in concert in the context of what? Solving licensing-basis problems. So what are we trying to do here? What does it do? Or what does it impact?

It provides holistic solutions with safety significance considerations. The process is a VLSSIR, a direct product from the low safety significance issue resolution initiative -- a process in the reactor oversight process. And then the TAR, which is really the thing that we're working on, or you're going to comment on. And then you have the backfit process, contained in policy Management Directive 8.4.

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So I am going to take you to the next slide, which is going to be something very familiar to you. But it is just like going back to the basics. So this slide, there are several past examples of agency-expended resources significant -- significant resources on specific issues whose ultimate resolution would not improve public health and safety, promote the common defense and security, or protect the environment. Many of the situations are attributable to lack of detail, ambiguity, uniqueness, or complexity in individual current licensing basis.

So here, in this picture, if you can see the horizontal axis represents a spectrum of issue licensing basis standing. The vertical axis represents the spectrum of safety significance. A major focus of the NRC's vision is that the agency resources be expended commensurate with a risk-informed, safety significance of the issue. Now let's come to the key messages, and also the three processes we're talking about. The VLSSIR, the backfitting, and the technical assistance requests are all shown on the left, lower quadrant of the left part of this graphic.

So what are the messages here?

The VLSSIR is an opportunity to close out

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and disposition an issue based on indeterminate licensing basis, as determined by the NRC -- indeterminate -- as determined by the NRC. And of very low safety significance. And then the backfitting issues are triggered as a higher threshold of safety significance.

And then the other thing is that TAR will dedicate more resources on issues with elevated safety significance. One thing that we should not take away from this is that the TAR only belongs to this quadrant. That's not true. The TAR process can take issues from any of the four quadrants. The only thing we are stressing here, the TAR would, because of the graded approach, it would put more effort on issues of elevated safety significance.

The results of this right quadrant (audio interference) in the scope here, but I am going to just mention that of course the right quadrant is a bread-and-butter area, you can say. You focus on issues more important for safety, routine processes and there is a lot of scope to continue to innovate and collaborate. And the bottom, which is very low safety significance -- and also within the licensing basis, also an area of innovation with some innovative

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products being developed to address that.

So with that I am going to take you to the VLSSIR, again, this is just a recap. Many of you already know -- just so that -- to put matters in context. It's a four-part criteria from IMC -- Inspection Manual Chapter 0612. There is a licensing basis related issue. And there is a differing view with the licensee indicating the issues outside the plant licensing basis, and provides supporting basis, or documentation first.

Second, the inspector digs into the licensing basis documents with the help of the headquarters staff, and spends some time and cannot establish the licensing basis standing conclusively to, third, using the tool in IMC-609, the safety significance determination, the assessment leads to the conclusion that the issues of very low safety significance. And then the branch chief and the inspector agree that spending more effort researching the issue would not benefit public health and safety, and you could focus on other activities instead.

If all the four criteria are satisfied, then the issue is documented in the inspection report.

And then the issue is dispositioned, or closed out.

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So if you don't even remember all this criteria, bottom line, the VLSSIR is a pause button early in the game to use safety significance to guide the level of effort in solving a licensing basis related problem.

So with that we now move to our the integrated problem solving here. But to put it all together, how do we solve problems holistically? So this is a journey, as it says up on the title yes, there you go. So this is, from the left, there is an issue of concern, with the licensing basis standing question emerging from the reactor oversight process.

This box on the left is a reactor oversight process.

So there is a capability to screen early with the VLSSIR process. If the criteria is met. You have the opportunity to close it out -- to disposition it and document it publicly in the inspection report.

But what if the issue is possibly elevated for indeterminate safety significance or the criteria doesn't apply, then, pause again, use the most efficient process, use the most efficient route, recognizing the most efficient route could be talking to the headquarters and holding informal conference calls, and then closing it out that way. But you can't close out all issues that way.

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What if the issue gets stuck? Becomes stagnant? It is clear, it will need more resources, you have to dig into it. Then it becomes a potential candidate for TAR because it is a middle box here. TAR would put out a welcome mat for issues that are stuck or stagnant. TAR is NRR's process to offer information or technical assistance. It is by its very nature a non-routine process, but it also is resource intensive, you have to remember that, unless you can find an answer in the intake phase.

You're also going to fill out (audio interference) fill out information that is of all the facts with an intake form. But that (audio interference) this issue here that we are solving. Two key systems in the TAR process. One, the safety significance determination. Second, the licensing basis standing determination in the integrated team. There are members from the community of practice of backfit, OGC, topical subject matter experts. You have the requestor, the region, also participating in this.

You can have three outcomes: indeterminate licensing basis and a very low safety significance. Then the integrated team may recommend it for no

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further regulatory action, and then document it, remembering that this is for information only -- that document, which is typically a non-public -- is fed to the region to take appropriate actions or decisions. The second, if it is in the licensing basis, again, using all the facts that you have collected, that response -- a fact-based response will be fed back to the regions for appropriate actions. Maybe there is an enforcement action.

When the issue is clearly outside the licensing basis, this is documented in the memo and this calls for a referral. The Commission directed that risk-insights must be considered, to the extent practical as part of backfitting actions. Therefore, the intelligence of the safety significance from the TAR process is fed in with this to the backfitting process. So the backfitting process should consider the input derived from the TAR. And that might help the backfitting process to make its decisions early.

Now when there's one more thing that's very important and that I mentioned in the beginning.

Remember, it is the licensee's plant and the TAR is about plant-specific issues. They may impact the licensees. Therefore there is a lot of interfaces

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with the TAR -- in the TAR process with the licensees.

Opportunity to collect diverse perspectives in solving licensing basis problems. And that's the other value-add.

One more thing that -- should be remembered here, that this VLSSIR is also very low safety significance. Over here, this is also very low safety significance. Remember, the matter with NRR's TAR is another perspective that -- another set of perspectives with the integrated team so that an issue that could not be dispositioned here may be -- we may be able to disposition it after you, you know, take that advantage of the work of the integrated team, and the safety significance determination. That's another thing to remember.

So the common thread between these three efforts is that they work alongside existing agency processes while using structured and well-reasoned assessments which take advantage of the integrated decision making principles, using probabilistic risk insights and deterministic activities. And the net-effect help better focus agency and licensee resources on issues more important to safety as combining with our vision to be a modern, risk-informed regulator.

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So with that, I am going to move to slide number 10 and we will have Alex say a few words here. Alex Schwab.

MR. SCHWAB: Thank you, Booma. Can everybody hear me -- quick sound check?

MR. SMITH: We can hear you.

MR. SCHWAB: Thank you, George. And Booma said, my name is Alex Schwab. I am a reliability and risk analyst in the Division of Risk Assessment. As Booma touched on, the general idea of the safety significance determination tool is that it's a risk-informed tool, so it takes risk insights along with safety margin, making sure that there is no additional concerns with safety margins and defense in-depth in an integrated process to help determine whether the possibility could -- the issue could possibly screen out as low safety significance, so we can determine if -- so we don't use agency resources on an issue that is not commensurate with its safety significance.

The idea of this tool was it was supposed to be using already-existing agency tools to kind of supplement its guidance and use that moving forward. So we are not trying to reinvent the wheel here. The other idea is that it's supposed to be a pretty quick

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cut.

The risk analyst is going to be working with a subject matter -- SME, subject matter expert, on the topic at hand. And the risk analyst trying to come up with risk insights and working with the topical subject matter experts, make sure that they're not missing any defense in-depth or safety margin concerns to determine if the issue can be screened out as very low safety significance. The whole idea being that a lot of -- there are some issues that are going to have complicated aspects where it can't screen out. But we're only spending 10 to 20 hours here.

So if it doesn't screen out and we have to spend more resources on it, so be it. Or at least we didn't waste a ton of time deciding whether it could be screened out or not. So the idea here is it's a quick cut and -- and hopefully, to get issues that aren't very safety significant out early.

That's pretty much all I had to say, Booma. I'll pass it back on to you, unless you had any other questions or concerns, or things to add.

MS. VENKATARAMAN: Thank you so much, Alex. I think now we move to the next slide. This is a very quick recap, I've already mentioned that.

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So we are now, this is the next steps for the process. The draft right now, we'll be talking to the industry in a moment and then we'll take all your comments, consider it appropriately. And our plan is to complete the COM-106 by August.

With that, before we move on to our discussion portion, I'm going to stop here and see if there are any questions from the Industry Panelists. We will not be taking questions from the public at this time. This is only for our presentation portion.

MR. RITI: Hey, Booma, this is Tim Riti from NEI. Are you ready for comments and questions from us now?

MS. VENKATARAMAN: No. No, this is only for the presentation. We are not getting into the discussion portion yet.

MR. RITI: Okay, thank you.

MS. VENKATARAMAN: Okay. I think now we will move to our next thing in the agenda, which is the discussion.

Now, before we go on there, I would like Jenny and George, if you could help, and let us see from the Industry, all their participants who are going to be speaking. They are presenters or

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panelists. And also, I think Gregory, he'd also be moved to a panelist.

So, if you could do that. Let's take a few moments and do that and we'll see if we have everyone.

MR. SMITH: So, Gregory is now panelist. Is there anyone else from the Industry who cannot mute, unmute their phone because they're an attendee, not a panelist?

Well, let me, actually, let me --

MS. VENKATARAMAN: Okay. One of the ways is to look at the participant list and make sure, maybe Tim could make sure that, so that we have all the people who are going to speak.

I know that Steve Catron and, let's see here. I can see Tim Riti, okay. Victoria. So, I would say that, Tim Riti, are we supposed to be working with the list that you gave or, I know that Jenny made them, the people on the list the presenters.

MR. RITI: Hey, Booma, I had looked at the list. I don't see everyone but I think we have enough participation. And then if someone wants to raise their hand if they're in and they want to become a

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panelist, ask a question, they can do that. But we're good to proceed.

MS. VENKATARAMAN: Okay. So, George, are you able to see all the panelists because you will be moderating, making sure that people are, if they become, something happens they're able to raise their hands. So, George, are you able to see all the panelists now?

MR. SMITH: That's correct. I can see all the panelists. And I can see those on the phone. But I understand the panelists are the ones who will be in discussion at this time.

MS. VENKATARAMAN: Correct. Okay. So, all right. I think let's go ahead for the panel discussion. And I'm going to pull up this document here.

Okay, can everyone see that? I pulled it up just in case if we need to go to our draft document, okay?

Give me one conformation that a person can see the document I pulled up.

MR. RITI: It's visible.

MS. VENKATARAMAN: Wonderful. Thank you. So we're going to open up this session with all the

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industry. There is no chat box.

This is being, obviously being recorded by a court reporter so he is making, he is actually going to record everything.

So this is, right now, this discussion is only for the people who are on the Panel. So I would say, I would request the Industry to ask us questions and then let's start the discussion.

MR. RITI: Okay, this is Tim Riti from NEI. I'm going to go ahead and speak on behalf of NEI. I'm going to have a few comments, a few questions. I'll just ask for folks that if they want to add the comments to go ahead and feel free to jump in.

And I'll go ahead and start. The first thing I want to do is make a comment that the flow of COM-106 and the time limits, goals that were established should alleviate the previous concerns related to how long issues were left opened and unresolved. So, I just wanted to make that comment.

The second item. Additional information was included in Section 4.7, that's the stakeholder's interactions to reinforce that items being addressed in the TAR process is an extension of the process it

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serves.

For example, the question to address unresolved item or URI during an inspection is an extension of that inspection.

The section further states that the TAR process should be transparent whenever possible. Balancing that transparency with potential consequences of sharing preliminary or predecisional information.

Previously, the opportunity to engage during the TAR process was more limiting with less opportunities for licensing engagement throughout, due the consideration of being predecisional.

Can you describe how interactions with the licensee would be different now than in the previous process?

MS. VENKATARAMAN: Okay, so let me understand.

So this is our, I have pulled up the 4.7. The external stakeholder interactions. Yes.

So this, as I have mentioned, the picture that I have shown about the three-step graded approach. And we have seen that that was one of the lessons learned from the past that the licensee inputs

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was taken inconsistently.

So that was one of the major lessons learned item that we worked off on. And so if you look at, if you go to the next slide, some of these, like each one has its own subsection. The intake, screening and evaluation and the in-depth review.

Each one of them talks about, one, there is notifications when the, you know, the issue goes in or are is closed. Number one.

And number two, an opportunity for voluntary inputs. Specifically in the screening and evaluation. That includes talking about the integrated team, anything additional that you would give, if there are disputed facts or if something to do with safety significance.

And then in the in-depth review phase, remember the third phase, there is an engagement in the beginning with the team, and where you were made aware of the issue, what happened in the screening and evaluation, the facts of the issue, ability to collect inputs from the you, perspectives from you. And then when we come out it's like an exit call we share with the conclusion and the facts supporting the conclusion of the draft response.

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But that is all in a verbal space. So that's one of the things we want.

The TAR is an internal process. And because it is actually following the process, the streamlining is as if it's always a fact gathering exercise of making sure all the stakeholders are in for them at various points.

So, to say that this is, what you're seeing is in 4.7 is like the general description, and we also talk about the interfaces, verbal, we talk about the verbal interactions, the voluntary supplement. And then in each of the written, if it's possible, each of them, and go back and describe the instructions of how that happens and who the people make it happen.

Does it make sense?

MR. RITI: Yes, thanks, Booma. The reason I asked the question was, if you recall back in our previous discussions, there was a tendency that during issues, it was going through the TAR process and the licensee was looking to maybe get some updates or provide this to see how things were going, if there was so many, any other opportunity to engage, et cetera, there was a lot of concern that, hey, this is

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turning, this is going to become a decision. And therefore because it's a decision it would be predecisional we can't share the information.

And you guys made it very clear that the TAR process doesn't make a decision it feeds a process so the communication should be able to be more free, freely shared with the licensee throughout. That's still my understanding, is that your understanding as well?

MS. VENKATARAMAN: Yes. So I have pulled up one of the flow charts with an in-depth review.

You would see that that is correct. So we are, but at the same time we, the TAR has to follow the process that it is serving. So we have used that.

So there is no documentation but there is information being provided to you that, yes, these are facts we collected and that is the basis of the conclusion.

Because it is up to the office, the requester, to take this information and to do whatever with it. So that's a fundamental difference here.

But there is more engagement, as you see in the beginning, there is a kickoff, licensee entirety. And so you come and license the input

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opportunity. And then in the very end you have opportunity.

And the other thing we wanted to point out was in the in-depth review the, you are the external stakeholder. The internal stakeholder, as a region, they don't concur on it, but they, again, they provide inputs also. So that's the other part I wanted to point out.

And we have considered the fact that in taking all of the perspectives really makes a big difference when you are solving complex licensing basis issues.

I would like to also asks Tim Reed if he would like to add, or any other NRC Panel Member both, if you like to add anything here? Or from the region.

MR. REED: No, I don't have anything to add, Booma, thanks.

MR. RITI: Okay, thanks, Booma. I'm going to go ahead and, on the similar theme.

Also, I appreciate the fact that you have the information for giving stakeholder input, verbal, written, voluntary supplemental information, which could be a position paper, white paper or even something more formal in the docket.

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We were just interested in how that information, when it is obtained, will be shared with the team through the TAR process and then captured as part of the final report, et cetera. We're just interested in all the licensee's positions, the various ways that they could be captured would be after the TAR process.

MS. VENKATARAMAN: Okay. I think we have instructions written here. So one of the things, to keep it in mind is which process we are in.

Okay. So the TAR is NRR's process. It's really its own, like I said, a non-routine process. So it tends to work alongside other processes. Whatever it is feeding into number one.

So the TAR coordinator will work with the requesting office inspector, or whoever submitted the question or the, whoever submitted the question or the DORL project PM, however the question comes, for us to gather the information.

And here, even though we are providing this additional inputs or additional information, it is not like, for example, a licensing action, right, where you have a request for additional information. That's not what this is about, this is because we are

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solving an issue.

And so, you are providing information from your side for consideration which would help. So yes.

So that will be considered by, remember, we have documentation in each of the phases.

The screening and evaluation, they're actually internal, because they're internal. So it is used. So they will be all attached and put and packaged in ADAMS and included.

Same thing with the in-depth review. So, and therefore in the end, for example, when we have this call, the facts of the draft response in conversation you will know that we use X, Y, Z. In the position paper, let's say you provided an input.

And also we have also reduced, as you see, if the timeline has been reduced, in the sense that 30 days for the screening and evaluation, very quickly the integrated team does it. So we'll consider it and we'll attach it to the screening and evaluation memo.

In-depth review, 80 days. Again, we consider your information and that's what it's going to be.

And if you see also, I want to point out one of the other things we put is a check, no, that's,

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in the very end they consider a blow-by-blow, It's Appendix D.

That shows how we collect. And you, as a licensee, also has to provide very quick information here to be considered. Because this is, idea is to do it. Do it with timeliness.

So does anyone else on the team, in our Panel, if you could add, that would be great, if you have anything to add.

MR. CATALDO: Yes, Booma, this is Paul Cataldo.

MS. VENKATARAMAN: Yes.

MR. CATALDO: Region I representative. I'd like to add that one of the common critical and local, I'll call it the local communication, that takes place routinely, will remain in effect.

And that is the licensing representative from the site and the resident inspectors, if it's a power reactor. And that's the issue that's going through the TAR process.

That link will remain and will be appropriately utilized to provide that exchange of information.

So you're not going to be lacking any

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updates of how the TAR process will be going through the process. So that link will remain in place. And utilize it to the most extent possible in order to get the information that you need.

That's all I'd like to add, Booma.

MS. VENKATARAMAN: Thank you so much, Paul.

MR. RITI: All right, thank you, Booma. I want to move on. I have a comment. My comment is, the document has, provides an increased focus on back-fitting, getting the applicable subject matter expert engaged early and referencing Enclosure 2 of the VLSSIR recommendations memo for consideration if the issue is within a plant licensing basis.

You clearly point out that licensing basis information is unique to the plant. May have varying levels of detail. So, I just want to point out, appreciate that being included in the document.

For the next question, as part of an in-depth review phase in Section 4.10.8, the TAR coordinator will lead a call with the requester, NRR technical staff is needed, and the licensee to share the conclusion and supporting facts of the draft TAR response, prior to routing the TAR for concurrence.

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So the question is, will there be an opportunity for the licensee to dispute facts or provide additional information at that time?

MS. VENKATARAMAN: Okay, so we are talking about 4.10.9, the issues of TAR response, correct?

MR. RITI: Yes, 4.10.8, the section right before concurrent, where it goes into concurrence.

MS. VENKATARAMAN: Right. Yes. So, I think, let me think through this one. So, let me understand your question first.

So we are saying here that we have reached, we write a point where it's, I think we have briefed the ET, we have briefed the region. And we have like a TAR response, which we are ready to issue at the time we are ensuring, telling all of them that this is what we have.

And we are showing you the facts and the conclusion. Verbally we are saying, and this is how the facts were used or this is the, or whatever inputs are to you, are given to use.

So your question is, at this point is there an opportunity to, an opportunity for you to provide more facts, is that what you're saying?

MR. RITI: Yes. Is there an opportunity

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to provide additional facts or a dispute, maybe any of the information provided, whichever?

MS. VENKATARAMAN: We do not. This one, as it is written, and you can see that, initially, in the beginning of the in-depth review started, we talked and took your facts. And it is the same with the Region II.

So no. at this point, as it is, there is no more interface at this point. So this is something that the team has done, this is a conclusion. And that's how it is written. Yes.

And the TAR response would be, but I get, if you know where the NRR stands, as far as the TAR team stands, with the issue. So you know that it is going to accept those facts and conclusion.

MR. RITI: Thanks, Booma. And that's how we read it too, but we just wanted to ask the question.

Additionally, in section 4.10.9, it states the licensee will be notified when the TAR is closed.

But there is nothing that discusses the potential, or different outcome, following the concurrence process.

So the question is, could the outcome of the TAR change during concurrence?

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MS. VENKATARAMAN: Oh, that's a, okay, let me see here. So yes. Oh yes, we take this and it goes through the concurrence process.

If the outcome, the whole idea is, it's a very good question. If something changes, we probably, if something changes over here there would be notification that they would include, then the new information.

Yes, even though it doesn't say that. But it's a good question.

MR. RITI: Okay. And I would just, I would imply that --

MS. VENKATARAMAN: The assumption, yes, the assumption over here is, you know, it has gone through the management and everything. This is more like the technical, an OGC, for this particular spot, what you're saying is it's possible.

If that happens then maybe a, where something changes we may have to come back to look at it. Because that's how this process works is mainly, the notification is very important to make sure that there is notification with the stakeholders at all points of what is happening. Yes.

MR. RITI: Yes, thanks, Booma. And that's

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what we, in our team, we looked at it and we said, if something were to change our assumption would be, it would roll back up to Section 4.10.8, licensee would get communication on the change and not just that the TAR is closed and then see that it changed later. So, okay. Thank you.

The next is a comment. The process contains detailed methods for early determination of safety significance to help inform resolution paths.

The next few questions will focus on safety significant determination. So under the background and basis section, this is Page 1 of instructions, it notes that if a conclusion of very low safety significance cannot be determined within a total level effort of approximately ten to 20 hours, the issue is likely not clearly a very low safety significance and a recommendation of indeterminate should be made to the integrated team.

The first question is, are there examples that you have identified that would have yielded a determination of indeterminate after a nominal level of effort?

We're just curious if the team was able to come up with some examples that may have put us in

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that spot.

MR. SCHWAB: Booma, I wasn't really, I know you had benchmarked some stuff I believe, but I, this is Alex Schwab from Division of Risk Assessment.

I know you had benchmarked some stuff but I wasn't part of the project when you had so I'm not aware of where that ended up or not. Do you have the answer for that, Booma? Booma, you might be on mute.

MS. VENKATARAMAN: Oh, thank you so much. I had been on mute. I apologize.

So could you tell me which page you're talking about? Which one you're looking at?

MR. RITI: Yes. Go to the instructions on Page 1.

MS. VENKATARAMAN: Okay. Okay, here.

MR. RITI: And it's going to talk about ten to 20 hours.

MS. VENKATARAMAN: Right.

MR. REED: So, Booma, this is Tim Reed. I think on one of the tabletops that we did we in fact, actually, we didn't say indeterminate we came up with very low. I don't think we had an indeterminate that I can remember.

Oh. Back where table topping is, we had

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the two teams. We had the licensing basis team and then we had the call team. You know, safety significance determination team.

I don't recall when that was indeterminate.

MR. SCHWAB: Yes, Tim. The only one I was aware of, that I was filled in on, was one where you actually did a kind of newer issue. And it was classified as very low.

MR. REED: All right.

MR. SCHWAB: So I wasn't sure if we went back and did historical ones or not. I thought I might have heard that but I'm not, I wasn't part of the project.

MR. REED: Yes, not as part of this. On the VLSSIR process we looked at a lot of old TARs but it wasn't like this.

Yes, we did do a tabletop where we had two teams. And the safety significance determination team won the race, so to speak. And it came up to be very low.

I don't recall, I thought maybe we did another one but I'm blanking out. Can't remember right now.

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MS. VENKATARAMAN: Yes. So, I now remember. That's right. So when we did a tabletop, there was also the tabletop illustration that we did with the Industry. But before that we had, we had done with VLSSIR. And also for the integrated team, as it's integrated. And then the safety significance group breaking out and doing their thing.

But I know from Don Helton, the ten to 20 hours, he used based on this judgement. And then various other examples. He also did previously in some of the tabletops.

So that's how, that was his estimate. Now, I don't know if he had a great, you know, he broke those ten to 20 hours.

But you were right, Tim Reed, Tim, that on the tabletop we did it was really less. The team didn't take 20 hours it was less than ten hours.

MR. RITI: I thought it was probably, Don was on both teams, right, as I was and so I think Don was probably informed by all the VLSSIR stuff we did too. You know, for the IMC portion of it too. So that's my memory, but thanks.

MS. VENKATARAMAN: Yes. So the VLSSIR uses the IMC-609 approach. But this one, remember,

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uses this matter which has been put specifically for, by Don for the COM-106.

This model could be used in other guidance's. So I think that was one of the reasons.

And then also, we also talked about the integrated team talking to the licensee, maybe to get to define the issue of concern. All those things would probably go parallel with this because there's a lot of work that goes to the safety significance. The way the template is.

Let me see if I have the template. Yes, see the issue characterization, I remember that. So I think all that plays into that.

So, is your question, Tim, what is the basis for the ten to 20 hours?

MR. RITI: It was more to see that if you felt that issues would take that amount of time routinely. And then you windup not actually making a safety significance determination, it would be more that they've already spent ten to 20 hours, we're not sure, let's just move it in and use the TAR process going forward.

MR. SCHWAB: So, Tim, I think, this is Alex Schwab again, the idea isn't that we say, oh, we

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throw our hands up, ten to 20 hours is reached, we're throwing our hands up and saying, we're just going to, it's more, we've looked into the issue and it should only take ten or 20 hours to have enough data gathered, whether we can easily make some assumptions to screen it in or out or not within that ten or 20 hours.

If it seems like, my understanding of the way we have the process designed is, hey, if it's like we can gather data and make some assumptions and still have it be pretty cut, quick, cut and dry and take a little bit longer than ten to 20 then okay, maybe we keep going. It's not, ten or 20 hours we're done-done.

It's hopefully, in that ten or 20 hours we either know whether or not we can, certain assumptions and declare it and screen it out. Or we kind of realize it's a pretty complicated issue and there's other concerns and we can't do that. That's kind of the general thought process.

MR. RITI: Yes, thanks, Alex. That's kind of what I was getting at. We just wanted to make sure there wasn't a, the process seemed if it was really though to get through it in ten to 20 hours versus

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let's make sure we got all the data and then we should go make a reasonable assessment in that amount of time.

So it sounds like you guys addressed that.

Thank you.

MR. SCHWAB: Okay.

MR. RITI: This follow-up question is based on the low safety significant issue resolution process. Has there been any additional insights identified from the Agency's use of the low safety significance determination process that could help with the timely determination of safety significance in the TAR process or are they really just sort of one in the same?

MR. SCHWAB: Are you referencing like ROP FVP, Tim?

MR. RITI: Or anything else that may have determined safety significance from the stuff that has been going on since the beginning of the year now. It's being looked at as part of the TAR process.

Is there any learnings oh so far over the few months?

MR. SCHWAB: And you're talking about feeding in specifically to the safety significance and

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determination process tool?

MR. RITI: That's right.

MR. SCHWAB: Okay. My understanding would be, it's a different tool so it's hard to take a lot of lessons learned like from the VLSSIR process.

The VLSSIR is a very simply screening just using, pretty just IMC-609 Appendix A where we're trying to get some, in the SSDP we're trying to get some real numbers.

So my answer would be, nothing that I'm aware of or have seen because it is such a kind of unique screening tool that's kind of separate from a lot of the other, we try to use the other tools as much as possible but we had to tailor it to the specific use. And a lot of the lessons learned that you might be able to take, it's a different use so we weren't able to necessarily draw anything. That I'm aware of.

But anybody on the NRC side can correct me if I'm wrong.

MR. REED: No, Alex, I think that alliance, certainly with my understanding so far, we haven't done a whole lot of that, the issues having be in this position, the VLSSIR so far.

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But so far that's been running sort of independent. In other words it's, the issues that have been closed out and documented basically have been following IMC-609. It's over, done and documented.

So it's really been kind of running on its own independent. Like Alex said, not really learning anything that would help Alex's process here in the dark.

MS. VENKATARAMAN: Yes, I agree. If you remember the picture that I put up for nexus inspection diagram, so the VLSSIR, is like the first set using certain amount of resources and all safety significant consideration.

And some of the issues of the VLSSIR doesn't tackle, come to the TAR process. And here, the idea here is, number one, it is a safety significance tool which uses the integrated decision making principle.

But it is different. It is different because it uses the template that you can see. There is there other ways of doing it. And then you use the integrated team and the perspectives to do it.

So there hasn't been really any influence

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for it. The LSSIR, the overarching effort, had many recommendations.

The first one was the VLSSIR, the second one was to enhance the TAR process to have a graded risk-informed approach. So, we kind of, kind of they are running in parallel.

Some things that couldn't be dispositioned in VLSSIR could be referenced to the TAR process and could be dispositioned.

MR. SMITH: Okay, Booma, just to let you know, give you a little time check, we have about four minutes left before we get to the public comment period. We did start this portion a little late so we have, we went a couple minutes over. Just give you a heads up.

MS. VENKATARAMAN: Yes, thank you, George. Yes, so we can go for public comments at 2:40. Yes, I have a clock also right here, yes. So yes, we can start in three minutes.

MR. RITI: If it's okay, one more question, Booma.

MS. VENKATARAMAN: Yes.

MR. RITI: And I do have Victoria Anderson from NEI on to help for any clarification of this, but

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the question is, since a substantial portion of the fleet has implemented 50.69, has the staff considered making 50.69 approaches the first option for safety margins defense in-depth?

The reason I'm asking is, this approach would be more accurate and less time consuming with less new analytical work needed.

MR. SCHWAB: Hey, Tim, I mean, I understand -- so, to understand the question you're asking, we would use the licensee's categorization or safety margins and defense in-depth for giving aspects?

MS. ANDERSON: Alex, this is Victoria. And yes, that's correct. Basically, the suggestion is that perhaps, because the 50.69 categorization and other work is already done, you could use that as the first option, or the preferred option. And then if a licensee doesn't have 50.69 you could go to the other option.

I don't think it's vital but just something to consider.

MR. SCHWAB: Understood. We'll consider it. I'm not exactly sure. I see a comment you guys made earlier along, something along those lines.

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And just in general, we'll consider it, but I think in general we'd like to make attendance and make sure we're analyzing the issue from our perspective with everything. With other different things like, with other NRC processes we're considering using information like that.

We'll consider it. But it might be that for this (audio interference) what makes more sense for us to have our own considerations. But we'll definitely think about it.

MS. ANDERSON: All right, thank you.

MR. SCHWAB: Thanks.

MS. VENKATARAMAN: How about with the Industry, I would like to ask we take, we go to do the public comments since it's like 2:39 and in a few seconds 2:40 we said, we kind of estimated.

And then, George, I would look to you for like opening the lines maybe. There are telephone people.

MR. SMITH: Okay. At this time I can now unmute everyone on the telephone line.

So, again, we want everyone's comments to get captured in the transcripts. So we would ask, if you're on the telephone, because you don't have the

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capability to raise your hand, if you can just state your name.

If there are multiple folks, I'll get your name and then I'll call on one at a time to make a comment. If you've dialed into the Webex, you can raise your hand and I'll unmute you at that time.

Of course, Panelists, again, you can mute and unmute yourself. We just ask that you stay on mute because the background noise will get captured.

Now I've unmuted everyone on the telephone. So, because you're unmuted, we can hear your background noise also. And if you called in, and you're in the webinar, we're going to get feedback. So you have to mute one, either the telephone or the Webex.

Is there anyone on the telephone line at this time that would like, have a question or like to make a comment?

If you do, please state your name and your affiliation. Again, this is anyone on the telephone line.

Okay. While we're waiting on anyone on the telephone line, and remember, you're still unmuted so we'll be able to capture your background noise. So

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if, please be aware of that.

Is there anyone on the Webex that have any additional questions or statements they would like to make at this time?

You only have to raise your hand and I'll unmute your mic.

Booma, is there any additional information that you'd like to present that perhaps you think that those that are out there may be interested in, can generate a question?

MS. VENKATARAMAN: Yes. So, we are requesting any members of the public, if you have comments on the draft guidance.

Now, the draft guidance is attached to the public meeting notice. So this is the TAR process. So if you have any public comments, any comments you can speak of at this time. We will have another opportunity later, so it's okay if you cannot think of comments now.

MR. SMITH: Okay, the phone lines are now open. If there is anyone on the line that have a question or a comment that they'd like to pose at this time, the lines are open, you may pose your question or comment.

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Again, if you can provide your name and affiliation, we would appreciate that so we can capture it in the transcript. Okay, Booma, at this time I'm not hearing any questions, there are no hands being raised.

I'll ask those other participants if there's any questions or comments that you are seeking, you can speak up at this time. That would be helpful to those members of the public that may not know of a question at this time. Is there any other NRC Panelists that would like to make a statement?

And again, if you're on the telephone, your line is unmuted so we hear your background noise so please mute your phone line. So, Booma, I have --

MS. VENKATARAMAN: Okay. Okay, I understand. We'll have another opportunity later.

So one thing though, now that we're discussing with NEI and Industry, I know some of you are participants in the Panel. I can see here on the attendee list there are people, Industry participants from, other Industry participants.

Let us give a moment to see if other Industry participants have any question or comment. And, George, if you could, please moderate their line.

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MR. SMITH: Okay.

MS. VENKATARAMAN: I think you have to raise a hand and George will unmute you if you're on Webex.

MR. SMITH: At this time I've unmuted the telephone lines also. We're getting feedback so just be mindful, if you're on the phone please mute your lines so we won't get your feedback.

If you're on Webex, you can raise your hand, and if you're not a Panelist, and I will unmute your line. Okay, Booma, I'm not showing any hands raised at this time --

MS. VENKATARAMAN: Okay.

MR. SMITH: -- folks on the phone.

MS. VENKATARAMAN: Okay. I think we'll continue with your discussion and see that maybe it can stimulate comments in the next segment when we go to the public or the Industry, other Industry participants.

Let's continue with this. You may close the lines, George. And thank you, George, for this in helping us.

MR. SMITH: No problem. The lines are now closed.

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MS. VENKATARAMAN: So, Panelists, let's go back. NEI, we also have Entergy and NextEra. Let's continue with our discussion.

MR. RITI: Booma, this is Tim Riti from NEI. I just want to give an opportunity for any of the Industry folks that were part of the team, if they have any other questions or comments they'd like to share.

And then obviously give NextEra and Entergy a chance to ask questions and provide comments.

MS. VENKATARAMAN: Absolutely. Yes.

MR. SMITH: Booma?

MS. VENKATARAMAN: Yes, go ahead.

MR. SMITH: And, Booma, is there someone that's muted that needs to be unmuted or --

MS. VENKATARAMAN: I think, you have to see the Panelists. From the Panelists, just the Industry Panelists.

If anyone would like to provide a comment from NEI please let us know and then we can discuss at this time.

MR. SMITH: I've unmuted the telephone lines also. If Industry Panelists have called in.

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Again, for those on the telephone please be aware that we can hear the background noise.

MR. SMITH: Hey, Booma, I do not have anyone with their hands raised. There is no one on the telephone indicating that they would like to make a comment.

MS. VENKATARAMAN: Okay. Okay, I would like to ask Jenny, Jenny, you provided the Industry Panelist, I just want to know, do we have the list of people?

MR. RITI: Hey, Booma, this is --

MS. TOBIN: Hi, Booma. That list will be generated by the Webex system at close of business today. And so when I receive that list I will send it with the meeting summary.

MS. VENKATARAMAN: Yes, I'm just curious, I just want to know, I can see that our, I just want to know from the Panelist, the Industry Panelists, if they would like to unmute themselves and speak.

I'm just looking at, let me see, I'm looking at the Panel now. I have David Gullott, Marty Murphy.

If anyone of you are interested in speaking from NEI, asking a question, we can discuss

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at this time.

MR. RITI: Hey, Booma, this is Tim Riti from NEI.

MS. VENKATARAMAN: Okay.

MR. RITI: I believe all of our folks are good and you can go ahead and move on to NextEra and Entergy.

MS. VENKATARAMAN: Thank you, Tim, for letting me know. And thank you for everybody's patience working with the system.

So how about, let me ask if, from NextEra. Panelists from NextEra, would you like to make a, do you have a question or comment?

MR. CATRON: Thanks, Booma. This is Steve Catron from NextEra. I don't have any additional comments or questions. I'm satisfied so far.

MS. VENKATARAMAN: Thank you, Steve.

MS. PYLE: And, Booma, this is Stephanie Pyle. And I just appreciate the opportunity to participate. I have no further comments at this time.

MS. VENKATARAMAN: Okay, thank you, Stephanie. So it looks like we have completed the discussion portion with NEI and Industry.

So that you know, with the Webex and

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everything we don't kind of make a mistake, so, Tim, I would like to ask you, is this all the questions that you had come prepared for? Have we covered everything?

MR. RITI: Yes, thanks, Booma. I do have one additional question.

You know, we understand that the goal is to have the document implemented in August. We're interested in what kind of training that the staff may be getting and do you think there would be anything that might be available, publicly, from that training?

We're just looking at a little bit of the implementation logistics.

MS. VENKATARAMAN: Tim, thank you for that question. I know we had talked about this. And, Paul, you might help me with that also.

We had a conceptual kind of plan about once the COM-106 is completed, do more like a workshop style training for the Industry, not the Industry, I'm sorry, for the inspection staff or the people who will be generating the questions?

And also for the staff from the headquarters who will be the technical, who usually are participating in the integrated team.

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I am not sure we discussed about the Industry aspect of the training. I would like to ask Tim if, and this is something where something may have been discussed on the VLSSIR side also.

Otherwise, we have to, I have not particularly discussed anything about the Industry side. So, Paul, would you like to add anything on the training?

MR. CATALDO: Yes, sure. Let me just say from the onset that during this whole process for the working group that led into this revision to COM-106 and the re-branding, as Booma put it for the old TIA process into the TAR process.

We took information and input from inspectors, from all four regions, that have utilized the old TIA process. As cumbersome as it was, COM-106 was a procedure that was still utilized, it wasn't as detailed as it is now, and it doesn't have the tools and the interfaces that it has with independent processes, like we've discussed here.

But one of the things that I think helped was getting that input from the inspectors that have used the old process and having them see the draft versions of COM-106, the tools that are available.

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And when you think about it, the actual input form didn't exist in the reactor side, it existed in the construction side. The TAR process did.

But that was a tremendous benefit, the inspectors that had seen the revised COM-106 process.

That benefit to have a document to basically use and to identify what needs to be filled out.

The important aspects. You know, what are the facts, what are the questions, what's the issue that needs to be addressed.

And so, we received really good input from the inspectors in that regard for the re-banded COM-106. So I wanted to get that out, number one.

Number two, from a training looking forward, once this process gets finalized, this pandemic national health emergency has generated a lot of unique training opportunities in the NRC, knowledge management and otherwise. So to the extent that we can, we're going to utilize that.

The platforms that we have in order to get the information for COM-106 out to inspectors. And they've been part of the process all along, so a lot of the inspectors are going to see it for the first time.

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If they've never used it or didn't provide input, but we tried to include them in the process all along. So, for a majority of the folks that have used it, familiar with it, it should not be a surprise.

But it will go through the process. We'll be able to see the TAR intake form and the safety significance tool, the involvement of the regional SARs in the early onset.

And even with the new process, having the lawyers involved is going to help too. Because often times we lean forward too much and we try to anticipate what our own individual lawyers may have some questions on. Legally interpretable information and whatnot.

So, the process, as a whole, I think has improved. I personally was involved in the old, I processed a number of TIAs, and this is a much better product.

But as far as training, the workshops, we'll utilize whatever platforms that we've been using during this national pandemic in order to get the information out. And they've been utilized very well so far.

You know, the in-person type of regional

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counterpart meetings we've been having. That's, right now, it's not something that we're looking forward to.

So the platforms we have been using, the Skype for business and this Webex format has been tremendous tool during this national health emergency.

So, I look forward to those training opportunities to get the word out.

But the bottom line is, it's received some very positive marks from most of the people that have seen it throughout the process. Does that help?

MR. RITI: I appreciate that. And I was going to say, similar to the backfitted, the backfitting training that you did in the NRC, having that available to the licensee was really helpful just to make sure that we were all thinking the same way and we all had the same information.

So, if there is something that becomes available that could be made publicly available, or for licensees to use as well that you determine is valuable for us, we'd be happy to take it and use it.

MS. VENKATARAMAN: Thank you, Tim. We will take your input into consideration. And as we go forward, as we put the training together, we'll consider it and see what best way we can do that, yes.

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So, yes, the backfitting.

So, Tim, do you have anything to add on this? Tim Reed?

MR. REED: No. I mean, I would just echo some of what Paul already mentioned. That we want it to be less (audio interference) for your counterparts. We took a -- actually -- and Phil McKenna is unfortunately not here today but he is very familiar with this. Obviously, he took a number of times interacting with the regions, getting them familiar with it.

I think that it worked really well in the end. The regions were familiar with the new process and I think it's, so far it's been, it's gone well. And I think something similar to that, for this process, seemed to make sense of that.

I kind of agree with the comment from Tim Riti that making it public, it sounds like a really good idea when we get there. So there's a lot of moving parts right now so I think we need to kind of remove a couple of these free variables hopefully that would get to the point where we can actually train on something so we're not redoing that training. But I think we're getting to that point.

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MR. KELLAR: Yes, so this is Ray Keller, Region IV. We have, most of the regions, Region IV has it anyway, some training on what was coming so the individual inspectors knew what to be looking for.

And we've talked several times about what all training is going to look like once this is actually let out on the streets. And we haven't exactly come up with what we're going to do but we do have a couple of good ideas.

And I know that we'll be looking at ways we can communicate that with you as well.

MR. REED: Thank you.

MS. VENKATARAMAN: Okay. So any other questions from anyone from the Industry who are not on the Panel who may be calling in. I see that there are some calling users, or attendees, at this time.

MR. SMITH: Booma, I'll unmute the phone at this time.

MS. VENKATARAMAN: Yes, please, unmute the phone, George.

MR. SMITH: Okay, I've just unmuted the phones. I just want to let everyone know, if you're on the phone we can hear your background so please mute your phone.

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If you go to speak, please state your name and your affiliation, I would appreciate it. If you're on the phone and you'd like to make a comment, go ahead.

If you've dialed into the Webex and you're not a panelist, if you raise your hand and you have a comment I can unmute your phone. Or unmute your speaker.

MS. VENKATARAMAN: Okay.

MR. SMITH: Booma, we're not showing any at this time.

MS. VENKATARAMAN: Okay. So how about, we're going to go to our second round of public comments. Are there any members of the public who would make a comment at this time?

MR. SMITH: Okay, the phones are unmuted at this time. I'd like to remind you that we can hear your background noise so please mute your phone if you're on the phone.

Booma, we're not showing any comments at this time, though hands are raised and no one from the phone has indicated that they'd like to make any comment.

MS. VENKATARAMAN: Okay, George. Let's

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give it, 30 more seconds. You know that with this format people have to, so new there's so many things we have to do.

MR. SMITH: Okay, phones are all muted at this time. You know I'd like to remind everyone, we can hear your background noise, we can hear things.

MS. VENKATARAMAN: Okay, I think we'll move to our next segment. Which is for action items summary. So, but if anyone, any member of the public can think of a comment, definitely, please raise your hand, and then we can take your comment, so.

MR. SMITH: Hey, Booma, I have unmuted the phone in case there is any comments from the phone lines.

MS. VENKATARAMAN: I think we can go ahead and move to our action items. Thank you, George, you can close the lines.

MR. SMITH: Okay, the lines are closed at this time.

MS. VENKATARAMAN: Yes. Okay, so, so we will now go to our closing remarks summary. First of all I would like to thank, NEI industry participants, and the members of the public, to come and participate and provide us comments on this COM-106, the

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re-branded, the TIA process re-branded as TAR. So we had a very good discussion.

And I know that, on the licensee engagement. The questions in the licensee engagement, the safety significance portion, the level of effort, and also about the training and taking this COM-106 forward.

I would like to now invite anyone from NEI, Entergy, and NextEra for the industry to provide any closing remarks that you might have.

MR. RITI: This is Tim Riti from NEI. I just want to thank, thank you, Booma, for leading this effort. You know, describing the journey as the COM-106 was advancing from the previous revisions to the current revision and as the process search becoming utilized.

We definitely will be interested in doing any lessons learned or sharing operating experience with you and your staff. And perhaps even make it better, if we see some areas during implementation that could use some additional work.

So, I don't think the journey ends, as you would say, but we're happy to participate and we appreciate all the support getting us involved early.

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So, that's all I have, thanks.

MS. VENKATARAMAN: Thank you, Tim.
Energy or NextEra, any closing remarks?

MR. CATRON: Thanks, Booma, this is Steve
Catron from NextEra. I would just echo Tim's
comments. We appreciate being a part, being invited
to participate in this conversation. And, we'll
continue to do so going forward. That's all.

MS. PYLE: Excuse me, Booma, this is,
Stephanie. And again I thank you for the opportunity
to participate today. And participate in the previous
workshop. And I, along with Steve, echo NEI's
comments and look forward to following this issue as
we move forward. Thank you.

MS. VENKATARAMAN: Thank you, Stephanie.
And I would like to also point out that this
revitalization project wouldn't have been possible
without the synergistic effort from the working group.

And I can see that members of the working
group participated today and provided the remarks and
the answers.

As far as this, for this meeting, this was
the first, like webinar type meeting. And I
appreciate George Smith our host, and Jenny Tobin our

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technical Webex host, for providing the support. And all of you for your patience with how this was conducted. At this moment, I'm going to request, Gregory Suber, to provide some closing remarks.

MR. SMITH: Booma, I think Greg is not available at this time.

MS. VENKATARAMAN: Okay. How about, Nancy Salgado, are you online?

I think you may have to unmute her. She may have to raise her hand.

MR. SMITH: Is, did Nancy call in?

MS. VENKATARAMAN: I thought I saw her on the attendee list?

MR. SMITH: Okay I got her.

MS. VENKATARAMAN: Yes. Okay. If we're not able to, give her 30 more seconds, that's okay. That's all right, I think we can move on from here.

MR. SMITH: Well, Nancy's unmuted if you still would like her to speak.

MS. VENKATARAMAN: Nancy, can you hear us? Could you just say a few, closing words?

MS. SALGADO: I would like to just do a sound check first, Booma?

MR. SMITH: We ---

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MS. VENKATARAMAN: Yes, we can hear you.

MS. SALGADO: All right. Well, I'd like to just thank everyone who's participated in this journey. Especially, Booma.

She's taken this all the way and we'll hope to get this published here in the near future. And we appreciate all the comments that were provided today for consideration. And I just thank everyone for their time and their patience with Webex. And that's it for me, Booma.

MS. VENKATARAMAN: Thank you so much, Nancy.

So with this, George, you may close all the lines. And actually I'm going to give it back to you to provide the finishing words.

MR. SMITH: Great ---

MS. VENKATARAMAN: And you've been a wonderful host, yes. Thank you so much.

MR. SMITH: Great, thank you, Booma. Now I'd like to thank everyone for participating in the meeting today, your interest and comments will improve the TIA and TAR process.

We always welcome your feedback on public meetings that you may have that would help us improve

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these meetings. Including, any good practices, and that participants may want to share on this format. If you would like to provide feedback you may email Booma at booma.venkataraman@nrc.gov.

Thank you again for participating, and your interest in the TIA, TAR public webinar. I hope everyone have a great afternoon. Okay that's it, Booma, thank you very much.

MS. VENKATARAMAN: Thank you so much, have a wonderful afternoon, everyone.

(Whereupon, the above-entitled matter went off the record at 3:10 p.m.)

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