# Graded Approach Pilot Implementation Considerations

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# **Graded Approach Pilot Implementation Considerations**

## **Contents:**

- Purposes of the Graded Approach Pilot
- Six basic results, each with:
  - Reason(s) to Implement
  - Potential Challenge(s) to Implementing



# **RIRP I-16-01 Graded Approach Pilot - Two Purposes**

#### **First Purpose:**

Logically Reformat the Certificate of Compliance (CoC) and Appendices

## Why?

• Enhance clarity and ease of use of the documents.

Second purpose:

Using agreed-to evaluation criteria,

Assess each <u>CoC condition</u> and <u>Technical</u> <u>Specifications (TS) requirement;</u> determine where each belongs (CoC, CoC Appendices, UFSAR, nowhere.)

## Why?

- Better focus resources on nuclear safety.
- Reduce unnecessary amendments for changes involving items of low safety significance.



# Graded Approach Pilot Result 1 of 6:

# **Entirely removed citations of regulations**

## Reason(s) to Implement:

 Reduces information 'clutter' in CoC, CoC Appendices, and 72.212 reports Potential Challenges to Implementing:

• None



# Graded Approach Pilot Result 2 of 6:

## **CoC / TS information moved to the UFSAR (other than FQTs)**

#### Reason(s) to Implement:

- Reduced size of the CoC and CoC Appendices files.
- Fewer requirements needing an amendment to make changes.

#### **Potential Challenges to Implementing:**

- If not identical to the specific Graded Approach item, RIRP evaluationcriteria process will be needed, adding time and cost.
- If timing of an amendment is a key commercial factor, this must be considered.



# Graded Approach Pilot Result 3 of 6:

Moved nearly all fuel qualification tables (FQTs) from the TS to the UFSAR, with bounding tables remaining in TS

## Reason(s) to Implement:

- Removed a great deal of information from the TS file.
- Allows non-bounding FQTs to be considered for change under 72.48, reducing the number of NRC/industry licensing actions.

#### Potential Challenges to Implementing:

- If the Shielding MOE (Margins Whitepaper Item) standardizes fuel qualification, this Graded Approach result may become overcome by events (OBE).
- Not all CoCs (even other TN CoCs) use FQTs; some use formulas or other approaches (these also may become OBE).





# Graded Approach Pilot Result 4 of 6 (1 of 3):

## **Reformatted the CoC itself and the CoC appendices**

#### Reason(s) to Implement:

- Adds clarity and logical organization.
- To some degree, separates CoC holder items from general licensee items.
- To some degree, separates onetime requirements from ongoing operational requirements.

#### **Potential Challenges to Implementing:**

- New format may not be wellreceived by existing general licensees (GLs) - Even going from custom to standardized TS under the same CoC has caused GLs to have very different 'sets of books' if loaded under 'before and after' amendments.
- Revamped GL 72.212 reports needed for these CoC and Appendices documents.



# Graded Approach Pilot Result 4 of 6 (2 of 3)

## **Reformatted the CoC itself and the CoC appendices**

**Potential Challenges to Implementing:** 

- Time/cost it takes for NRC to review the new format and shifted information.
- Information-accuracy risk: Accuracy of new CoC and appendices files is paramount and Murphy's Law is very much alive and well (CoC renewal experience).



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# Graded Approach Pilot Result 4 of 6 (3 of 3)

## **Reformatted the CoC itself and the CoC appendices**

## **Potential Challenges to Implementing:**

- Time/cost of writing re-characterized items - Not always a direct shift. (e.g., from LCO format to ITE format (Inspections, Tests, and Evaluations) means revamping the LCO).
- Competition with other CoC holders (first to market concept). If timing of an amendment is a key commercial factor, the added scope could impact schedule.





# Graded Approach Pilot "Result" 5 of 6:

Left in place "borderline" items that perhaps could now move with fairly straightforward design changes and technical justification

#### Reason(s) to Implement:

- RIRP prohibited design/technical changes, so a few items could perhaps <u>now</u> move with a bit of design/ technical interaction. (Low-hanging fruit)
- For the Pilot, a particularly technically-sensitive component with a great deal of TS language in the past can now be considered for <u>information reduction</u>.

#### **Potential Challenges to Implementing:**

- These would be new scope items, subject to the RIRP evaluationcriteria, adding to applicant development timing.
- RIRP evaluation-criteria will need to be <u>combined with</u> the 'normal' amendment review (SRP) necessary steps by the NRC, adding to NRC timing.

# Graded Approach Pilot Result 6 of 6:

Confirmed that many CoC conditions and TS must remain, and many should remain where they are

## Reason(s) to "Implement":

- Pilot confirmed that many CoC conditions and TS must remain, mainly per 72.236(a).
- These are not in doubt, so not a distraction.

Potential Challenges to "Implementing":

 None; these items can be tagged/flagged, which will allow focus on the other CoC/ CoC Appendices items for consideration.



# Acronyms

certificate of compliance CoC FQT fuel qualification table general licensee GL ITE inspections, tests, and evaluations limiting condition for operation LCO method of evaluation MOE **Nuclear Regulatory Commission** NRC OBE overcome by events RIRP regulatory issue resolution protocol TS technical specifications UFSAR updated final safety analysis report





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