



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 17, 2021

MEMORANDUM TO: Benjamin Beasley, Chief  
Advanced Reactor Licensing Branch  
Division of Advanced Reactors and Non-Power  
Production and Utilization Facilities  
Office of Nuclear Reactor Regulation

FROM: Samuel Cuadrado, Project Manager  
Advanced Reactor Licensing Branch  
Division of Advanced Reactors and Non-Power *Samuel Cuadrado*  
Production and Utilization Facilities  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF NOVEMBER 19, 2020, PUBLIC MEETING TO  
DISCUSS KAIROS POWER LLC'S QUALITY ASSURANCE  
PROGRAM TOPICAL REPORT CLARIFICATION QUESTIONS  
SET 2

On November 19, 2020 (Agencywide Documents Access and Management System (ADAMS) under Accession No. [ML20315A525](#)), the U.S. Nuclear Regulatory Commission (NRC) staff held a virtual Category 1 public meeting with Kairos Power LLC (Kairos) using the Microsoft Teams platform. The purpose of the meeting was to discuss with Kairos the second set of NRC's clarification questions regarding Kairos Quality Assurance (QA) Program topical report (TR). The NRC's clarification questions can be found in ADAMS under Accession No. [ML20311A208](#). The list of attendees is provided as an enclosure to this document. Members of the public were not in attendance.

The NRC's second set of clarification questions had four questions that were shared with Kairos via email on October 29, 2020 (ADAMS Accession No. [ML20311A231](#)), prior to the public meeting. During the meeting Kairos and the NRC staff discussed each of the four clarification questions.

Question 1 requested clarification on Kairos TR Section 2.5 regarding the regulatory process that would be used by Kairos to handle changes to NRC-accepted QA TRs.

Kairos stated that based on the February 19, 2020 (ADAMS Accession No. ML20092J195), public meeting discussion with the staff and the staff's safety evaluation report (SER) on Westinghouse QA TR (ADAMS Accession No. ML19246A008) that it understood that in addition to the Title 10 of the *Code of Federal Regulations* (10 CFR) 50.4 process it could use the 10 CFR 50.54(a) regulatory process to make changes to its QA TR.

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The NRC staff stated that Westinghouse has had an established and mature program for many years that has been inspected many times and for which the staff has lots of oversight, and due to these facts the methodology proposed by Westinghouse to evaluate changes to its QA TR was approved by the staff.

The NRC staff noted that as a non-licensee, changes to an approved Kairos QA TR by Kairos are pursuant to 10 CFR Section 50.4.b.7, which states, in part, that "change to an NRC-accepted quality assurance topical report from non licensees must be submitted for approval." Kairos stated that they will discuss this question internally and may need to have further discussions with the staff on this matter in another public meeting.

Question 2 requested clarification on Kairos QA Program Independent Review Group reporting. Kairos stated that to address this question it plans to make some editorial changes to its QA TR. These revisions to the TR will be provided to the staff in an upcoming submittal of the revised QA TR. The staff stated that it was okay with the proposed approach.

Question 3 requested clarification on Kairos QA TR Section 2.6, "Personnel Training and Qualifications," alignment with the time requirement of 18 months described in 10 CFR 50.120, "Training and qualification of nuclear power plant personnel." Kairos stated that the 18-month time requirement from 10 CFR 50.120 must be met irrespective of the commitments to the National Nuclear Accrediting Board of the National Academy of Nuclear Training (NNAB/NANT) accredited programs. The staff stated that it will discuss internally to determine if the clarification provided by Kairos is enough to address the staff's question or if the information would need to be provided on the docket.

Question 4 requested clarification regarding Kairos QA program tracking of dates of certification or recertification and date of certification expiration to be maintained for training and certification records. Kairos stated that its QA program description requires that the date of certification (or recertification) be recorded in the subject records of qualification. Kairos also stated that its QA program description does not require the recording date of certification expiration, this remains optional. The Kairos QA program description conforms to the remaining provisions of NQA-1-2015, Requirement 2, Section 401. The staff stated that Kairos clarification addressed its concern.

Kairos asked what the planned timeline for receipt of additional clarification questions from the staff was. The NRC staff stated that if no major issues come up during the remaining review of Kairos QA TR, staff plans to have its next and last set of clarification question to Kairos by January 2021. In closing the staff stated that, if possible, it plans to discuss the next set of clarification questions with Kairos during a public meeting to be held by January 2021.

Project No. 99902069

Enclosure:  
List of attendees

SUBJECT: SUMMARY OF NOVEMBER 19, 2020, PUBLIC MEETING TO DISCUSS  
 KAIROS POWER LLC's QUALITY ASSURANCE PROGRAM TOPICAL  
 REPORT SET 2 OF CLARIFICATION QUESTIONS  
 DATED: MARCH 17, 2021

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<b>NAME</b>	SCuadrado	SLent	BBeasley	SCuadrado
<b>DATE</b>	3/15/21	3/15/21	3/17/21	3/17/21

**OFFICIAL RECORD COPY**

**List of Attendees**

NAME	ORGANIZATION
John Price	Kairos Power LLC (Kairos)
Darrell Gardner	Kairos
Peter Hastings	Kairos
Zack Rad	Kairos
Kerri Kavanagh	U.S. Nuclear Regulatory Commission (NRC)
Stu Magruder	NRC
Jonathan Ortega	NRC
Paul Prescott	NRC
Samuel Cuadrado	NRC