

CONFERENCE CALL BETWEEN NRC AND LES
REGARDING REDUNDANT IROFS AMENDMENT APPLICATION

March 30, 2021

Background

By letter dated February 12, 2021, LES responded to 2 RAI questions:

1. Definition of Redundant IROFS – This concern is resolved.
2. Examples demonstrating how a Redundant IROFS would be implemented. – This concern is unresolved.

Discussion:

In order to approve the amendment, the NRC staff must find reasonable assurance of adequate protection. We don't believe we have a basis to make that finding given the large amount of unknown information. Specifically, we have the following concerns:

1. The significant reduction in quality level has the potential to result in a reduction in safety. Without knowing the accident sequence (the hazards) and understanding the IROFS, we cannot determine how much the reduced quality levels will affect safety.
2. Based on the example LES provided, there would be no reduction in the credit assigned to either Redundant IROFS. This approach seems non-conservative and does not account for the reduction in the applied management measures, per the proposed approach.

Options:

1. We can consider approval if the application is amended in one of the following ways:
 - a. Specific accident sequences are identified and all changes to IROFS and management measures are documented and well understood, or
 - b. A commitment is added to implement a detailed Redundant IROFS change process with specific criteria that will be met before a Redundant IROFS is used (similar to License Condition 30 for changes to the SAR), or
 - c. A commitment is added to maintain one or more IROFS at the current quality level and only use QL-2R for an additional Redundant IROFS.
2. In addition, if the use of Redundant IROFS is approved, LES should address why NRC should continue to approve the use of non-cited violations (NCVs) for dispositioning Severity Level IV violations. When the Corrective Action Program was found acceptable for granting the NCV policy in 2014 (ADAMS Accession No. ML13301A706), the approval was based, in part, on a finding that Quality Level 1 would be applied to each IROFS. In the years since, the quality level for certain IROFS has been relaxed and this application would relax the quality level even further.