

Very Low Safety Significance Issue Resolution (VLSSIR) Initiative

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Original Paradigm for Addressing Issues

Evaluate issue to determine regulatory actions:

- Generic Issue Screening
- Order
- Backfit (72.62)

Address issue with appropriate regulatory tools:

- Enforcement
- Order
- Consider Prompt Corrective Action
- Corrective Action
- Enforcement Discretion
- Change Licensing Basis (72.7 Exemption, 72.56 Amendment, etc.)
- Change Requirement (Rulemaking)
- Technical Assistance Request (TAR)

Clearly NOT in Licensing Basis Scope

Clearly in Licensing Basis Scope

Region of Uncertainty if in or out of Licensing Basis Scope

May involve significant resources to decide issue status via TAR process

Very Low Safety Significant Issue Resolution (VLSSIR) Initiative

Purpose Statement



Situations in which an inspector/reviewer is not sure an issue is required to be addressed in the licensing basis



In the past, significant effort (resources and time) has been expended to determine if an issue is in/out of licensing basis before considering its significance



Put in place internal process enhancements to consider significance of an issue for situations where it is not clear if an issue is within the licensing basis scope

Revised Concept for Addressing Issues

Evaluate issue to determine regulatory actions:

- Generic Issue Screening
- Order
- Backfit (72.62)

Address issue with appropriate regulatory tools:

- Enforcement
- Order
- Consider Prompt Corrective Action
- Technical Assistance Request (TAR)

Safety Significant

Clearly NOT in Licensing Basis Scope

Limited effort to determine issue is outside licensing basis & of (very) low safety significance:

- Stop Pursu g to Full esoluti
- Document sion sion the Bases
- Re-focus Resurces

Clearly in Licensing Basis Scope

Address issue with appropriate tools (achieve compliance or change licensing basis) such as:

- Corrective Action
- Epforcement Discretion
- Charge Lidensing sis (72.7 Exemption,
 - 72. Am∉ Im t, etc.)
 - Calling Palifiren (Rulemaking)

Low Safety

Sign

Potential for Near-Term Improvements

Background

Building off similar initiative in NRR



Working team formed within NMSS to share insights in implementing a consistent approach across business lines



Includes representatives from each business line, regions, and general counsel.



Augmented with staff involved with a specific topic under consideration (e.g., Addressing Tornado Hazard during ISFSI STOs).

Within Inspection Arena

NOT Pursuing to Full
Resolution

LOWER LEFT QUADRANT



VLSSIR outcomes are different than inspection findings



Issue is not formally resolved, but provides the information/rationale for not pursuing issue further and no additional significant effort is spent trying to fully close issue



If information arises that indicates the issue is within licensing basis or is not of VLSS then the issue can be revisited

CONCEPT OF INSPECTION PROCESS ON LICENSING BASIS QUESTIONS Clearly in Licensing Basis Not clear if issue Inspector **Issue Not** needs to be **Identifies Pursued** addressed in **Continue Normal** Issue **Further** licensing basis **Inspection Processes** Inspector et al evaluate licensee Out LB Scope information In LB Scope **Nominal Effort Determine** Safety Still Not Sure Significance **Document Issue with Document Rationale in** Rationale **Inspection Report for Very Low Not Very Low** (Use TAR process for further, **NOT Pursuing to Full** more detailed, evaluation) Resolution

Interface with TAR Process

Means by which many
Licensing Basis
Questions are
Addressed

Procedure under revision (still draft)

Interfaces with VLSSIR approach

Need to gain experience in use

Additional revisions to draft TAR procedure will be implemented as tabletop exercises of example issues are conducted and/or as lessons learned

Issues Within Licensing Basis Arena



The VLSSIR concept can also apply to issues within the licensing basis, but it is implemented differently



The VLSSIR process considers significance in determining the appropriate option(s) to address issues within the licensing basis



Aspects of licensing review scope, focus, and level of detail also consider significance

LOWER RIGHT QUADRANT

Concept for Addressing Issues

Evaluate issue to determine regulatory actions:

- Generic Issue Screening
- Order
- Backfit (72.62)

Address issue with appropriate regulatory tools:

- Enforcement
- Order
- Consider Prompt Corrective Action
- Technical Assistance Request (TAR)

Safety Significant

Clearly NOT in Licensing Basis Scope

Limited effort to determine issue is likely outside licensing basis & is of (very) low safety significance:

- Document Delin wit Base
- Re-focus Resoulces

Clearly in Licensing Basis Scope

Address issue with appropriate tools (achieve compliance or change licensing basis) such as:

- Corrective Action
- Enforcement Discretion
- Charge Lidensing sis (72.7 Exemption,
 - 72. Ame in at, etc.)
 - Ckilling Richard (Rulemaking)

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Potential Near-Term Improvements

Discussion & Questions

