



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

May 12, 2022

MEMORANDUM TO: Richard Chang, Chief  
Licensing Projects Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: Ekaterina Lenning, Project Manager */RA/*  
Licensing Projects Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF APRIL 18, 2022, MEETING WITH NUCLEAR  
ENERGY INSTITUTE REGULATORY ISSUES TASK FORCE  
(EPID L-2019-TOP-0044)

On April 18, 2022, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the Nuclear Energy Institute (NEI) Regulatory Issues Task Force. The meeting was held in a hybrid format (i.e., attendance in-person, virtual, and teleconference) and all in-person attendees followed the guidance for visitors to NRC facilities on NRC-sponsored events located on the NRC COVID-19 Update public website: <https://www.nrc.gov/about-nrc/covid-19/index.html>. The purpose of the meeting was to discuss regulatory issues associated with licensing and oversight. The meeting notice is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML22104A047, and the presentation slides are located in ADAMS under Accession No. ML22103A083. A list of attendees is provided as an enclosure to this memorandum.

The NRC staff began the public meeting with an introduction and explanation of logistical information. Mike King, Deputy Director of the Office of Nuclear Reactor Regulation for Reactor Safety Programs and Mission Support, NRC, and Brett Titus, Technical Advisor, NEI, provided opening remarks. The topics discussed during the meeting are summarized below. At the end of the presentation, the public had an opportunity to ask questions of the NRC staff. No regulatory decisions were made during this meeting.

**Innovation/EMBARC: Update on Web-based licensing requests and update on MAP-X**

The NRC staff provided an update on Innovation/EMBARC activities including updates on web-based relief requests (WRRs) and MAP-X that was created to empower stakeholders with a secure, flexible, and personalized self-service gateway to retrieve, submit, and interact with regulatory related information and assessment tools through a standard web browser.

The NRC staff stated that WRRs were launched on April 5, 2021, and 13 WRRs were submitted so far (Arizona Public Service Company (1), Tennessee Valley Authority (1), Xcel Energy (11))

and two are already completed/authorized. The NRC staff indicated that less than 50 total project hours and less than 10 project manager hours were billed for each project.

The NRC staff discussed the benefits for the WRRs, explaining that web-based submittals are more flexible than the electronic information exchange, text automatically transfers to the NRC electronic safety evaluation, and the subsequent submittals become easier. The NRC staff highlighted the following WRR improvements suggested by industry stakeholders: availability of the NRC review status, more detailed instructions and tips, formatting and appearance of the submittals, a standard submission template, previews in the Word file, and a faster user credentials process.

While providing the update on MAP-X, the NRC staff mentioned its benefits for the NRC (it allows for the streamlining of incoming data, and increases processing efficiency and automation) and for the licensees (access is enabled anywhere, it is centralized, flexible, secure, personalized, has a built-in ability to clone previous submittals, provides data validation and auto-populated fields, and allows users to create, edit, preview, submit, and receive confirmation).

The NRC staff stated that the goals are to deploy the licensee event report module in 2022, to identify and prioritize future modules, and for continuous Improvement.

The NRC staff encouraged industry to provide feedback and mentioned that the NRC is planning to have a public meeting on WRRs in the near future.

The NEI representatives provided feedback stating that such new tools that relieve administrative burden are very beneficial for industry's future licensing submittals. They highlighted good communication between the NRC staff and licensees and more efficient reviews.

### **Update on Risk-informed Process for Evaluations (RIPE) and Discussion on Exclusions using RIPE in Support of the Technical Specifications' Changes**

The NRC provided an update on RIPE indicating that RIPE Revision 2 to the Safety Impact Characterization (SIC) Guidance includes changes to the guidelines for characterizing the safety impact of issues.

The NRC staff stated that TSG-DORL-2021-01 was being revised to remove limitations on technical specification (TS) changes, added the TS Branch as lead for the TS change in license amendment requests (LARs) submitted under RIPE, and included clarification that a TS LAR submitted under RIPE must demonstrate that the Probabilistic Risk Assessment considerations described in the TSG-DORL-2021-01 justify that the requested change is not significant to public health and safety. The NRC plans to complete and issue SIC guidance in June 2022.

The NRC emphasized the importance of pre-application activities for RIPE submittals that would support efficiency of the NRC's reviews.

The NEI representatives asked the NRC staff to indicate if industry's support on RIPE is needed. The NRC staff stated that there is a need to address any lessons learned and to engage broader stakeholder groups to highlight the potential benefit of using RIPE when TS changes are involved.

The NEI representatives provided feedback highlighting the value of pre-submittal meetings, audits, and requests for confirmation of information.

### **Discussion on Best Practices in Communications for the Review of Licensing Actions**

As a continuation to the previous topic, the NRC emphasized the importance of open communication and applicants' early engagement with the NRC when planning for future submittals.

The NEI representatives stated that early communications with the NRC on future licensing submittals are very beneficial.

### **Updated on Standard Review Plan Modernization Effort**

The NRC staff provided an update on the status of Standard Review Plan Modernization (SRPMod) effort that included the background, detailed overview of the benefits for modernizing the SRP, assessment of the SRPMod effort, outcome from the assessment with the outline of what is changing, specifics on the revised SRP project plan, and next steps that includes plans for obtaining industry feedback and scheduling a public meeting in summer 2022. The NRC staff mentioned plans for submitting batches of modernized SRP sections to the Office of Management and Budget for review, with the first batch submittal planned for summer 2022.

The NRC staff reiterated that the SRPMod effort focuses on what is important to safety and to provide guidance that is focused on the requirements. The SRPMod effort goals are the development of clear and concise guidance for completing reviews and the improved quality of the NRC review products including requests for additional information (RAIs) and safety evaluations (SEs).

The NEI representatives indicated that they would continue to monitor the progress of this effort and will offer their support as needed. The NEI representatives asked the NRC staff to let NEI know if the need for support is identified.

### **Industry Notice of the Enforcement Discretion/Emergency License Amendment Request Desk Guide Development**

NEI opened the discussion to provide an update on the status of the notice of enforcement discretion (NOED)/emergency license amendment request desk guide being developed by industry. The NRC staff emphasized the need for early and clear communications during the NOED/potential emergency amendment situations. The NRC staff indicated that a checklist with standard questions might be developed to assist in assessing such situations.

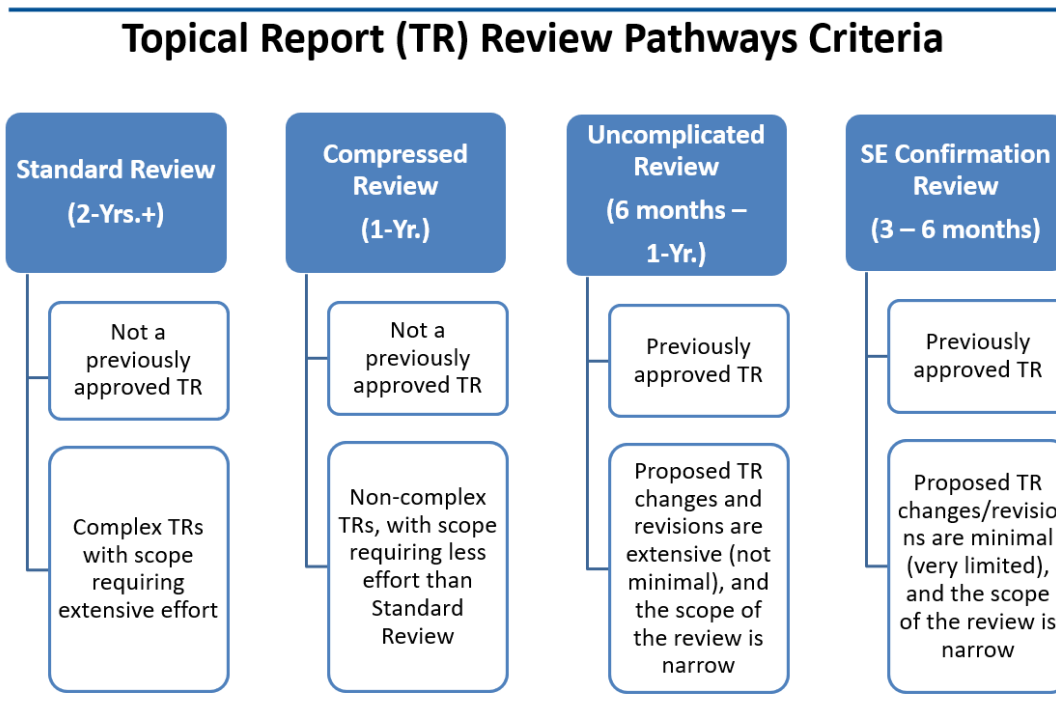
The NEI representatives also stated that there is constant communication between the sites and their corporate offices.

### **Overview of Changes to LIC-500, Revision 9, "Topical Report Process"**

The NRC staff presented an overview of the changes to the LIC-500, Revision 9, "Topical Report Process." The NRC staff indicated that three new review pathways for the topical reports (TRs), which were added to increase the efficiency and timeliness of the reviews: compressed, uncomplicated, and SE confirmation reviews, noting that the traditional standard review remains

available also. The NRC staff described added review process efficiencies that include e-mail transmittals of RAs, draft and final SEs, audits, and four new NRC forms (895-898).

The NRC staff provided a detailed overview of the TRs' review pathways criteria for each type of review that are reflected in the picture below:



The NRC staff explained in detail the process for standard, compressed, and uncomplicated and SE confirmation reviews.

The NRC staff also described the current TR review prioritization that is based on the business line or agency priority, the TR's relation to the direct response to a safety significant event, the level of safety significance, the schedule priority, and if the TR is accident tolerant fuel related. The NRC is currently reviewing these priorities and is considering including additional ones, such as: complexity of the submittal, requested timeline, if the submittal is related to a future licensing action, resource availability for the review, and exigent requests.

The NEI representatives thanked the staff for the update and asked the NRC staff to let NEI know if the need for support is identified.

### Proprietary Reviews

The NRC led a discussion on a limited number of submittals that contain proprietary information to highlight recent occurrences that have made NRC reviews of proprietary withholding requests more complicated.

Additionally, the NRC reminded the stakeholders to refer to the 10 CFR 2.390(b)(4)(ii) and 10 CFR 2.390(b)(4)(iv) when identifying proprietary information, so no publicly available information is marked as proprietary.

The NRC also reminded the industry to refer to the publicly available LIC-204, Revision 4, "Handling Requests to Withhold Proprietary Information from Public Disclosure" (ADAMS Accession No. ML20049A139), and that the applicants need to work with the NRC project managers to resolve any issues with the submittals.

### **Accident Tolerant Fuel Next Steps and Coordination**

The NRC led discussion on the ATF next steps and coordination. The NRC emphasized the importance of open discussions, early engagements, and pre-application activities for future ATF submittals that will support NRC's resource planning and streamlined reviews.

### **NEI's Feedback on the Virtual 2022 Regulatory Information Conference**

The 2022 Regulatory Information Conference (RIC) was held March 8 through March 10 in a hybrid format (the in-person component followed all applicable safety guidelines), which consisted of several plenary sessions and 30 technical sessions.

The NEI representatives provided feedback stating that they appreciated the 2022 RIC focus on the new reactors, but they also would like to see topics such as the use of diverse and flexible coping strategies in licensing submittals on the agenda.

The NRC action item regarding a follow-up with NEI on the ways and timeframes for the stakeholders to submit future RIC topics of interest to the NRC was resolved.

No comments or questions were received at the meeting from members of the public.

Please direct any inquiries to Ekaterina Lenning at [Ekaterina.Lenning@nrc.gov](mailto:Ekaterina.Lenning@nrc.gov).

Docket No. 99902028

Enclosure:  
List of attendees

**List of Attendees**  
**Nuclear Energy Institute Regulatory Issues Task Force Public Meeting**  
**April 18, 2022**  
**1:00 pm – 4:00 pm**

Name	Organization
Brett Titus	Nuclear Energy Institute (NEI)
Aladar Csontos	NEI
Tony Brown	NEI
Melody Rodriguez	NEI
Mike King	U.S. Nuclear Regulatory Commission (NRC)
Bo Pham	NRC
Caroline Carusone	NRC
Gregory Suber	NRC
Richard Chang	NRC
Jackie Harvey	NRC
Tim Mossman	NRC
Justin Fuller	NRC
Audrey Klett	NRC
Richard Bright	NRC
Brian Wittick	NRC
Dana James	NRC
Michael Markley	NRC
Meena Khanna	NRC
Antonios Zoulis	NRC
Kristy Bucholtz	NRC
Jason Paige	NRC
Ekaterina Lenning	NRC
Daniel King	NRC
Ngola Otto	NRC
Ed Miller	NRC
Carol Moyer	NRC
Julie Ezell	NRC
Dennis Galvin	NRC
Siva Lingam	NRC
Brian Benney	NRC
Jay Robinson	NRC
John Hughey	NRC
Undine Shoop	NRC
Gayathri Sastry	NRC
Derek Scully	NRC
Tony Nakanishi	NRC
Kerby Scales	NRC
Andrew Zach	U. S. Senate Environment and Public Work
Mathew Cox	Arizona Public Service (APS)
Katherine Gill	APS

<b>Name</b>	<b>Organization</b>
Sarah Kane	APS
Archie Manoharan	BWX Technologies, Inc.
Larry Nicholson	Certrec
Deann Raleigh	Curtiss-Wright
Jana Bergman	Curtiss-Wright
Sophie Gutner	Dominion Energy
Phil Lashley	Energy Harbor
Stephenie Pyle	Entergy
Phillip Couture	Entergy
Ron Gaston	Entergy
Brian Mann	Excel Services
Dave Gullott	Constellation Nuclear
Roy Linthicum	Constellation Nuclear
Christian Ramos	Constellation Nuclear
Steve Catron	NextEra
Harry Ballian	PSEG Nuclear LLC (PSEG)
Mike Wiwel	PSEG
Hossein Hamzehee	Strategic Teaming and Resource Sharing Group
Cheryl Gayheart	Southern Nuclear Company
Wendy Brost	South Texas Project Nuclear Operating Company
Ricardo Medina	Tennessee Valley Authority (TVA)
Christopher Riedl	TVA
Stuart Rymer	TVA
Sarah Scott	Xcel Energy
Richard Stadtlander	Xcel Energy
Michelle Byman	Unknown
George Wilson	Unknown
James Cirilli	Unknown
Michael Bradbury	Unknown
John Pfabe	Unknown
Ian Gifford	Unknown

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INSTITUTE REGULATORY ISSUES TASK FORCE (EPID L-2019-TOP-0044)  
DATED MAY 12, 2022

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**EXTERNAL DISTRIBUTION:**

Brett Titus, NEI  
[bat@nei.org](mailto:bat@nei.org)

**ADAMS Accession Nos:**  
**ML22116A073 (Package)**  
**ML22104A047 (Meeting Notice)**  
**ML22103A083 (Presentation Slides)**  
**ML22124A254 (Meeting Summary)**

OFFICE	NRR/DORL/LLPB/PM	NRR/DORL/LLPB/LA	NRR/DORL/LLPB/BC	NRR/DORL/LLPB/PM
NAME	ELenning	DHarrison	RChang	ELenning
DATE	05/05/2022	05/09/2022	05/12/2022	05/12/2022

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