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Cc: [Stephen Poy](#)
Subject: Email Summary of MS Teams Meeting with TRISO-X on October 13, 2023 to discuss the Draft Material Control and Accounting and Fire Safety Requests for Additional Information (RAI)
Date: Friday, October 20, 2023 3:30:14 PM

SUMMARY OF MEETING HELD ON OCTOBER 13, 2023, WITH TRISO-X LLC TO DISCUSS DRAFT REQUESTS FOR ADDITIONAL INFORMATION RESPONSES ON MATERIAL CONTROL AND ACCOUNTING AND FIRE

The U.S. Nuclear Regulatory Commission (NRC) staff held a meeting with TRISO-X LLC (TRISO-X) on October 13, 2023, to discuss several draft requests for additional information (RAI) regarding the Material Control and Accounting (MC&A) and Fire safety reviews. The purpose of the meeting was to ensure that TRISO-X understood the contents of the RAIs and had an opportunity to request the NRC staff to clarify the text. A number of clarifications were identified for the RAIs.

Chemical RAI Discussion:

The MC&A RAIs were addressed during the first portion of the meeting and involved discussion of 15 RAIs. The NRC staff provided an overview for each RAI and TRISO-X identified several editorial clarifications as summarized below.

- RAI 1 – Reword the information needed section to clarify that TRISO-X can reference sections of the Fundamental Nuclear Material Control (FNMC) Plan where checks and balances are described.
- RAI-8&9 – Because the RAI-8 and RAI-9 appear to be similar, consider combining the two RAIs into one.
- RAI-13 – NRC staff will add a guidance section to this RAI referring to NUREG-2159, Rev.1, Section 8.4. TRISO-X also requested that a reference be included in the Information Needed section of the RAI.
- Observation - Consider converting the observation regarding the Standard Error of the Inventory Difference (SEID) to an RAI.

Fire RAI Discussion:

The second portion of the meeting involved a discussion of 15 Fire Safety RAIs. During the discussion, the applicant identified a number of cross references that may resolve several of the RAIs. The NRC staff asked if these references could be emailed following the meeting, and TRISO-X agreed. In addition, TRISO-X requested a number of editorial updates and clarifications, as summarized below.

The NRC staff agreed to consider the following updates to the RAIs:

- RAI-3 – Revise the RAI to clarify what sections of the submittal need to address fire training. Also, clarify in the Describe Issue section how emergency response relates to the question on training. Note: The reviewer agreed to coordinate his response with the emergency response reviewer.
- RAI-4 – Review FHA Table 6.1 to determine if the information requested in the RAIs is already provided.
- RAI-6 – Update the Regulatory Basis to point to Title 10 *Code of Federal Regulations* (10 CFR) 70.65(b)(2). In addition, the NRC agreed to consider combining sections (A) and (C). Based on the preliminary review, the NRC staff believes section (A) can

- be deleted.
- RAI-7 – Coordinate the language in the RAI with the ISA reviewer.
- RAI-9
 - A. Revise the Information Needed section to request the FHA demarcate the location of the fire areas and is not requesting additional signage.
 - B. Clarify that this section is requesting TRISO-X to provide fire modeling documents to clarify the projected size of fires.
 - C. Clarify the RAI is requesting a table or figure to identify the location of each fire area.
- RAI 14 – Clarify the information needs to be added to the FHA.

The NRC staff stated that the RAIs would be updated and a follow-up draft would be provided to TRISO-X for review. If TRISO-X required additional clarification, a follow-up call could be scheduled.

The public were given two opportunities to provide comments at the midpoint and end of the meeting. No comments were provided.

The NRC participants included:

Suzanne Ani, Nuclear Analysis and Risk Assessment Branch (NMSS/DFM/NARAB)
Glen Tuttle, Material Control and Accounting Branch (NMSS/DFM/MCAB)
James Rubenstone, Material Control and Accounting Branch (NMSS/DFM/MCAB)
Jimmy Chang, Containment, Thermal, Chemical & Fire Protection Branch (NMSS/DFM/CTCFB);
Joseph Rudd, Fuel Facilities Licensing Branch (NMSS/DFM/FFLB);
Matt Bartlett, Fuel Facilities Licensing Branch (NMSS/DFM/FFLB);
Stephen Poy, Fuel Facilities Licensing Branch (NMSS/DFM/FFLB); and
Samantha Lav, Division of Fuel Management (NMSS/DFM).

The TRISO-X participants included:

Jennifer Wheeler, Vice President, Regulatory Affairs;
Bob Maurer, Integrated Safety Manager;
Burns Cunningham, Licensing Engineer;
Gerard Couture, Safeguards Manager; and
Mike Shipman, MC&A Statistician.

Regards,

Stephen Poy

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