

Public Meeting on SLR Efficiencies

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Agenda

Recap of Initiative

Overview of the complete approach.

Graded Approach

Industry focus area and near-term opportunity.

Examples and Verification

Practical application of the Graded Approach.

Environmental

This is an essential piece of the effort.

Discussion/Next Steps

Continue moving forward.

Right-sizing SLR Reviews

- Reexamine what is needed for reasonable assurance
- Strong leadership and staff discipline are essential
- Adopt a more graded approach for reviews
- Schedule and resource metrics must strive for excellence and predictability



Graded Approach

- Risk and safety significance should be a driver for depth of review
- Maximize credit for adherence to guidance and standardization
- Focus on what has changed since the ILR review
 - AMPs that are unchanged over GALL revisions
 - AMPs with minimal changes over GALL revisions
- Fleetwide programs already reviewed for another ILR/SLR
- Licensee commitments that continue from ILR through SLR
- Routinely inspected programs subject to other regulatory requirements
 - ISI, IWE, IWL, FAC, Fire Protection, App. J, Boric Acid Control

Graded Approach

Most



Least

Review Resource Model

		Category 1	Category 2	Category 3
Licensee Program Adheres to GALL	Criteria	<ul style="list-style-type: none"> • Unchanged • New w/o Exception • Covered by Reg Program 	<ul style="list-style-type: none"> • Supplemented or Modified • More detailed Further Evaluation 	<ul style="list-style-type: none"> • Plant-specific Exceptions • Significant OE • Substantial Further Evaluation
	Review Scope	<ul style="list-style-type: none"> • Sampling of population • OE/Effectiveness • Consistency 	<ul style="list-style-type: none"> • Confirmatory gap analysis • Enhancement review 	<ul style="list-style-type: none"> • Detailed confirmatory evaluation • Detailed OE review
		Category 4	Category 5	Category 6
Licensee Program Contains Plant-specific Considerations	Criteria	<ul style="list-style-type: none"> • Unchanged 	<ul style="list-style-type: none"> • Supplemented or Modified • More detailed Further Evaluation 	<ul style="list-style-type: none"> • Plant-specific Exceptions • Significant OE • Substantial Further Evaluation
	Review Scope	<ul style="list-style-type: none"> • Sampling of population • OE/Effectiveness • Consistency 	<ul style="list-style-type: none"> • Confirmatory gap analysis • Enhancement review • Plant-specific considerations • Unique program attributes 	<ul style="list-style-type: none"> • Detailed confirmatory evaluation • Detailed OE review

Graded Approach - Example Plants

Plant	Total AMPs	Cat. 1		Cat. 2		Cat. 3	
		#	%	#	%	#	%
Plant X	48	22	46	15	31	11	23
Plant Y	49	21	43	17	35	11	22
Plant Z	48	12	25	21	44	15	31
Average	48	18	38	18	38	12	25

Key Takeaway: ~75% of AMPs are Cat. 1 and Cat. 2

General Verification Process

- Review Commitment for AMP
 - Confirm consistency with GALL-SLR (new – Cat. 1)
 - Confirm continuation of FLR AMP and inclusion of GALL-SLR enhancements (existing - Cat. 1)
 - Verify enhancements address the gaps to GALL-SLR or plant-specific OE (Cat. 2 & Cat. 3)

- Review Appendix A and B write-ups
 - Compare descriptions for consistency and required elements per SRP-SLR
 - Verify consistency within the application's write-ups, commitment table, and Appendix B tables
 - Review OE write-up in Appendix B
 - Check Further Evaluations where applicable
 - Search 9-column Tables for AMP and check for inconsistencies

Environmental Reviews

- Environmental reviews are an important component of SLR applications and efficiency is essential to meeting overall SLR review goals
- Seek understanding of environmental review plans and schedule that supports the NRC's FY2024 goals
- NEI introduced recommendations at public meeting on October 31, 2023
 - Interested in staff feedback and perspectives

Feedback and Discussion

Backup Slides

Environmental Review Efficiencies

- Eliminate or reduce the scoping process
- Fully leverage the LR GEIS and initial LR SEISs
- Use exemptions and develop a process for preparing an Environmental Assessment/Finding of No Significant Impact vice a SEIS
- Utilize the applicant's ER as the DSEIS (or DEA)
- Ensure strict adherence to time and page limits of NEPA as revised by the Fiscal Responsibility Act
- Allow hearings on environmental contentions after the DSEIS is issued

Environmental Review Efficiencies

- Bound the discussion of climate change-related impacts by “rule of reason” and proportionality
- Take lessons learned and process improvements from new reactor licensing proceedings
 - ◆ e.g.; enhanced audits, earlier and better-defined onsite evaluations, increased use of RCIs
- Fully utilize “online and digital technologies” identified by Congress in Section 110 (E-NEPA)
- Expedite a lessons learned review of NRC SLR-related consultations with other federal and state agencies