



# framatome

*Lessons Learned  
ANP-10339P, ARITA-  
ARTEMIS/RELAP  
Integrated Transient  
Analysis Methodology*

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# Agenda

**NRC Lessons Learned**

**Introduction**

**Summary**

**Framatome Lessons Learned**

- **Methodology Development**
- **Topical Report Development**
- **Pre-submittal Meeting**
- **Acceptance Review**
- **Audits for Understanding**
- **Requests for Additional Information**
- **Draft Safety Evaluation**
- **Final Safety Evaluation**
- **General Topics**

**Financial Implications**

**Requested Future Improvements**

# Introduction

**The purpose of the meeting today is to share the results of Framatome's review of the ARITA topical report development and review by the NRC.**

**It is our intent to identify areas for future improvement in both areas.**

**Future improvements will aid the NRC in achieving its objectives regarding topical report reviews and industry objectives in the submittal of topical reports.**

# Summary

## Top Lessons Learned:

- **Alignment with review schedule, scope, and commitments**
- **Management oversight, early escalation, and define the escalation process within LIC-500**
- **Develop preliminary SE at the onset of the review in accordance with LIC-500**

# Lessons Learned

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# Requested Future Improvements

**Framatome has incorporated improvements in our topical report process to help assure submittal of quality reports that allow the NRC to make safety and regulatory findings on each report.**

**The following requested future improvements will aid the NRC in achieving its objectives regarding topical report reviews while aiding industry in achieving its objectives in the submittal of topical reports.**

# Requested Future Improvements

- **Revise LIC-109/LIC-500 to address the following:**
  - **Use of a preliminary SE with open items prior to issuance of RAIs will aid in determining what information is needed to make a safety and regulatory finding on the report.**
  - **Management oversight, early escalation, and the escalation process need to be defined within LIC-500.**
  - **Publish detailed meeting and audit summaries to assure agreements are addressed and retained.**

# Requested Future Improvements

- **Revise LIC-109/LIC-500 to address the following:**
  - **Ensure traditional audits are utilized where underlying calculations are reviewed and interactions with technical experts are performed to resolve concerns are performed.**
  - **Allow audit reports with RAI responses to be used in final –A version without the need for a formal RAI and RAI response.**
  - **Provide instructions on revising acceptance review milestones in the event original milestones are exceeded.**

# Requested Future Improvements

- **Revise LIC-109/LIC-500 to address the following:**
  - **Provide the Technical Evaluation Report with the draft SE when subcontractors are used to assure transparency and completion.**
  - **Reference topical report information in lieu of repeating in the final SE.**
  - **Allow vendors to create NP version of final SE to reduce time and expense.**
  - **Develop an appeal process to address significant and unresolved disagreements between NRC Staff and Framatome Technical Staff positions as well as between NRC Staff and Contractor positions.**



# Requested Future Improvements

- **Revise LIC-109/LIC-500 to address the following:**
  - A written Issue Resolution Map with NRC tracking to adequate resolution should be kept and distributed to Framatome and NRC Staff so that all are aware of the resolution status of each item.
- **Develop guidance on what constitutes reasonable assurance for use by NRC Staff and share with industry.**