



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

March 25, 2024

MEMORANDUM TO: Samantha Lav, Chief
Fuel Facility Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

FROM: Matt Bartlett, Senior Project Manager
Fuel Facility Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

A handwritten signature in cursive script that reads "Matthew Bartlett".

Signed by Bartlett, Matthew
on 03/25/24

SUBJECT: SUMMARY OF MEETING ON JANUARY 25, 2024, WITH TRISO-X LLC, TO ALIGN ON U.S. NUCLEAR REGULATORY COMMISSION SUPPLEMENT FOR THE RESPONSES TO THE REQUESTS FOR ADDITIONAL INFORMATION REGARDING THE MANAGEMENT MEASURES REVIEW (ENTERPRISE PROJECT IDENTIFIER L-2022-NEW-0005)

The U.S. Nuclear Regulatory Commission (NRC) staff held a closed call with TRISO-X, LLC (TRISO-X) on January 25, 2024. The purpose of the meeting was to discuss the supplement for the responses to the programmatic requests for additional information (RAI) for the management measures and quality assurance review of the license application dated July 28, 2023 (Agencywide Documents Access and Management System Accession No. ML23209A821). The NRC's RAIs were developed based on the NRC review of the TRISO-X license application and integrated safety analysis summary received April 5, 2022 (ML22101A200) and supplemented by letters dated October 13, 2022 (ML22286A144) and November 4, 2022 (ML22308A251).

This was the second meeting between the NRC and TRISO-X staff to align on the supplemental information needed to demonstrate compliance with the regulations. In preparation for this meeting, the NRC provided TRISO-X several guidance documents and examples that TRISO-X could use to inform the development of their quality assurance program and to supplement their RAI responses. The documents were discussed during the meeting.

TRISO-X requested the discussion begin with RAI 1-4, "Quality Assurance Elements for IROFS." TRISO-X provided an overview of how the other quality assurance elements for item(s) relied on for safety (IROFS) would be applied. They referenced Table 4-4 in the integrated safety analysis summary that shows which management measures will be applied to the

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different types of IROFS. The NRC staff indicated additional information is needed regarding the minimum requirements for the highest safety significant IROFS and indicated that TRISO-X also needs to provide a methodology for how they grade the quality assurance program IROFS and other safety systems with lower safety significance.

For RAI 1-1, "Construction Qualifications," the NRC staff requested additional explanation of the TRISO-X program and commitment to ensure the regulatory affairs function staff are appropriately qualified for construction oversight.

Discussion continued regarding the TRISO-X responses for RAI 1-2, "Quality Standards for IROFS." The NRC staff provided an example related to calibration requirements for instrumentation. For items of high safety significance, a relevant example of a standard is ISO-17025, "Testing and calibration laboratories." Another referenceable standard is the Army Corps of Engineers Quality Manual. With regard to electronic records documentation, TRISO-X may consider the Nuclear Information and Records Management Association standard which is referenced in Reg Guide 1.28 Rev. 6, "Quality Assurance Program Criteria (Design and Construction)."

At the conclusion of the meeting, the NRC staff requested TRISO-X to supplement their responses to the original RAIs with updates based on feedback discussed at the follow-up meetings. The NRC staff also recommended that TRISO-X provide a draft of the supplemental information to the NRC in advance of the formal submittal to provide opportunity to align on resolution of the RAIs. The NRC staff will issue a letter requesting the supplemental information with a proposed submittal date.

Enclosures:

1. Participants List (public)
2. Meeting Summary (non-public)

cc: trisoX@listmgr.nrc.gov

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