

# **Meeting with Framatome and the NRC on Topical Report ANP-10356, Revision 0, "Licensing Guidance for Lead Test Assemblies"**

**August 14, 2024**

# Introduction

On July 3rd, 2024, Framatome submitted topical report ANP-10356.

- The submittal seeks to provide clarity on:
  - the LTA provision in the standard technical specifications,
  - the application of 10 CFR 50.59, and
  - exemptions to 10 CFR 50.46.

The acceptance review is ongoing.

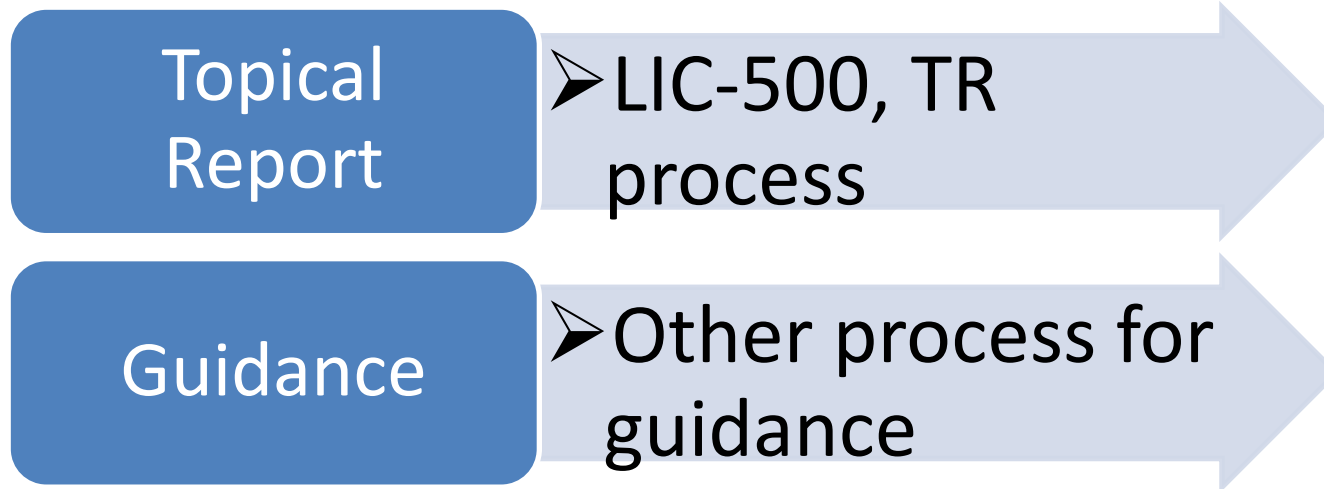
The NRC understands there are entities interested in further clarity to the NRC to NEI LTA letter of 2019, and the NRC is willing to engage.

# Intended Review Path

The NRC staff is **seeking clarification** on Framatome's intended review path for the submittal.

- Though submitted under the topical report review process, the submittal is largely worded as a regulatory guidance document.

Does Framatome intend that the NRC staff review the submittal (ANP-10356) as a **guidance document** for endorsement or as a **Topical Report (TR) for approval?**



# Topical Report Process

Potential Gaps identified in the submittal.

- **Technical basis** and **method of evaluation (calculational framework)** are unclear, potentially incomplete, and the submittal appears inconsistent with the intended purpose of a topical report.
  - Per LIC-500, “TR Process,” and LIC-109, “Acceptance Review Procedures,” the TR submittal must be sufficiently complete for NRC staff to begin its detailed technical review.
- Challenges with the interpretation of 10 CFR 50.59.
  - Approach in submittal appears inconsistent with NRC position as discussed in SECY-97-35.
  - Does not appear to provide a complete method of evaluation licensees can adopt without prior NRC approval (50.59(c)(2)(viii)).