



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

September 13, 2024

MEMORANDUM TO: Gerond A. George, Chief
Licensing Projects Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Ngola A. Otto, Project Manager */RA/*
Licensing Projects Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 14, 2024, MEETING WITH FRAMATOME INC.
AND THE U.S. NUCLEAR REGULATORY COMMISSION FOR
TOPICAL REPORT, ANP-10356, REVISION 0, "LICENSING
GUIDANCE FOR LEAD TEST ASSEMBLIES" (EPID L-2024-TOP-0026)

On August 14, 2024, the U.S. Nuclear Regulatory Commission (NRC) staff held a meeting via Microsoft Teams with representatives from Framatome Inc. (Framatome). The purpose of this meeting was for the NRC staff and Framatome representatives to discuss Topical Report (TR), ANP-10356, Rev. 0, "Licensing Guidance for Lead Test Assemblies," that Framatome submitted for review and approval on July 2, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24185A036). The NRC staff needed to clarify the appropriate process for the review of ANP-10356, Rev. 0, because Framatome had stated that the TR was intended to provide guidance on the interpretation and implementation of the Technical Specification Lead Test Assembly (LTA) provision within the construct of the plant's existing licensing bases. Therefore, the NRC staff needed feedback from Framatome to determine whether to evaluate the ANP-10356, Rev. 0 submittal as a TR or as guidance. Framatome also submitted an associated fee waiver request (ADAMS Accession No. ML24185A068). The NRC staff is currently conducting the acceptance review. The meeting notice is available in ADAMS at Accession No. ML24212A076.

The discussions focused on information (ADAMS Accession No. ML24225A251) that the NRC staff prepared for the meeting. The NRC staff explained that if the submittal was treated as a TR that it would follow the process outlined in LIC-500, "Topical Report Process" (ADAMS Accession No. ML20247G279). However, if the submittal is treated as guidance, it would follow a different NRC process. Framatome representatives clarified that they intended for the submittal to be treated as a TR. As such, the NRC staff provided feedback on what was submitted regarding gaps in the TR information provided that the NRC staff would need to conduct a review.

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The gaps in the information that were discussed included:

- Technical basis and method of evaluation
- Sufficient and complete information for NRC staff to begin its detailed technical review per Nuclear Reactor Regulation Office Instructions LIC-500, "TR Process," and LIC-109, "Acceptance Review Procedures" (ADAMS Accession No. ML20036C829).
- Inconsistency with NRC position as discussed in Commission Papers (SECY) 97-35, "Proposed Regulatory Guidance Related to Interpretation and Implementation of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.59 (Changes, Tests and Experiments)."
- Inconsistency with NRC positions in the 2019 NRC letter (ADAMS Accession No. ML18323A169) to Nuclear Energy Institute on LTA including key NRC positions the TR does not mention or explain regarding 10 CFR 50.59 requirements.
- Incomplete method of evaluation that licensees can adopt without prior NRC approval (10 CFR 50.59(c)(2)(viii)).

The NRC staff also asked several questions which focused on:

- Whether Framatome has inquired of other industry stakeholders as to if they were interested in the LTA topic.
- What in the 2019 NRC letter (ADAMS Accession No. ML18323A169), "Clarification on Regulatory Path for Lead Test Assemblies," to Nuclear Energy Institute on LTA that their submittal was attempting to clarify?
- How would this guidance be applied for plants that have different licensing basis requirements?

Framatome representative mentioned extending the acceptance period and having another meeting with the NRC staff in September 2024. Framatome plans to contact the NRC regarding another discussion on this TR. There were no questions or comments from members of the public.

Docket No. 99902041

Enclosure:
List of Attendees

List of Attendees

Public Meeting Between Framatome Inc. And The U.S. Nuclear Regulatory Commission

Regarding Topical Report ANP-10356, Rev. 0,

Framatome Licensing Guidance for Lead Test Assemblies

August 14, 2024, 9:00 am – 11:00 am

<u>NAME</u>	<u>ORGANIZATION</u>
Jerald Holm	Framatome Inc. (Framatome)
Paul Clifford	Framatome
David Beaulieu	U. S. Nuclear Regulatory Commission (NRC)
Bridget Curran	NRC
Vic Cusumano	NRC
Kevin Heller	NRC
Gerond George	NRC
Thomas Hipschman	NRC
Jo Jacobs	NRC
Michael Markley	NRC
Ngola Otto	NRC
Anthony Rossi	NRC
Andrea Russell	NRC
Amar Patel	NRC
Zach Turner	NRC
Chris VanWert	NRC
Chris Eastus	Entergy Nuclear
Amir Mobasheran	
Jana Bergman	
Raymond Wang	
Jobin Binu Daniel	
Amrit Patel	
Andrea Jennetta	

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EXTERNAL DISTRIBUTION:

Jerald.Holm.ext@Framatome.com

ADAMS Accession Nos.:

ML24240A020 (Package)

ML24240A019 (Summary)

ML24225A251 (Presentation)

***via email**

OFFICE	DORL/LLPB/PM*	DORL/LLPB/LA*	DORL/LLPB/BC*	DORL/LLPB/PM*
NAME	NOtto	DHarrison	GGeorge	NOtto
DATE	8/28/2024	9/11/2024	9/11/2024	9/13/2024

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