

**U.S. NUCLEAR REGULATORY COMMISSION SUMMARY OF THE AUGUST 14, 2024,  
INFORMATION PUBLIC MEETING TO DISCUSS LWR REACTOR ACCIDENT ANALYSIS  
MODERNIZATION EFFORTS WITH INDUSTRY STAKEHOLDERS**

**Meeting Summary**

The U.S. Nuclear Regulatory Commission (NRC) held an information public meeting on August 14, 2024, to discuss the Draft Reactor Accident Analysis Modernization (RAAM) report and provide interested stakeholders an opportunity to share their perspectives.<sup>1</sup> The NRC staff provided presentation slides to discuss during the public meeting.<sup>2</sup>

This hybrid information public meeting had attendees from NRC staff, industry stakeholders, and members of the public.

No decisions or commitments were made during the information meeting.

The following summarizes the discussion during the meeting:

- The NRC staff opened its presentation with an overview of the agenda and described the purpose of the meeting as sharing information regarding an NRC initiative to modernize reactor accident analysis regulatory framework and provide interested stakeholders an opportunity to share their perspectives. The desired outcome of the meeting was to use the feedback gathered during the meeting to finalize the RAAM report for the Office of Nuclear Reactor Regulation (NRR) Executive Team (ET), including recommendations for which items to pursue.
- The NRC staff described the RAAM Working Group as a team of seven senior technical experts and reviewers that was formed at the request of the NRR ET to look at improvements in licensing related to reactor accident analysis for both operating and new light-water reactors (LWRs).
- The NRC staff stated that the goal of the RAAM Working Group is to review NUREG 0800, Chapter 15 methods and propose ways to modernize the approach, using a holistic method, risk informing where possible, and using insights from ongoing reviews and related efforts.<sup>3</sup>
- The staff explained that the draft RAAM Working Group's report identified ideas that could be further investigated including options for implementation. The report estimated the level of interest from both operating reactors and new applicants and provided a final recommendation for each idea.

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<sup>1</sup> U.S. NRC, "Draft Reactor Accident Analysis Modernization Report," dated July 31, 2024, Agencywide Documents and Access Management Systems (ADAMS) Accession No. ML24213A123.

<sup>2</sup> U.S. NRC Presentation, "NRC Presentation – 8-14-24 – Public Meeting to Discuss LWR Reactor Accident Analysis Modernization (RAAM) Efforts," dated August 14, 2024, ML24220A292.

<sup>3</sup> U.S. NRC, NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," Chapter 15, "Transient and Accident Analysis," Revision 3, March 2007. <https://www.nrc.gov/docs/ML0707/ML070710376.pdf>

- Following the presentation, the NRC staff engaged in a discussion with public and industry stakeholders regarding the RAAM Working Group’s conclusions outlined in the draft RAAM report.
- An individual from Southern Nuclear Company stated that he thought several items were improperly identified as low priority for the operating fleet and should be changed to a higher priority.
- An individual from NuScale Power stated the NRC staff should consider addressing items that can be accomplished quickly such as developing Interim Staff Guidance (ISG).
- An individual from the Union of Concerned Scientists stated that while the perspective from the industry at large is that things are too conservative, he questioned if there were any items that go in the opposite direction (i.e., areas where additional controls or safety margin is needed). This individual stated that higher burnup fuel is a concern for the operating fleet, but that the industry does not seem interested in pursuing options that would add more regulations. The NRC staff responded that while adding requirements for passive failures could add more requirements since there is currently very limited guidance, having a repeatable framework for addressing the other issues would help establish consistency, transparency, and ensure safety.
- An individual from Constellation stated that including “time at temperature” criteria for the specified acceptable fuel design limits, would be beneficial to operating boiling-water reactors.
- An individual and member of the American Nuclear Society standards working group asked how the RAAM Working Group defined modernization. This individual stated that the Nuclear Energy Innovation and Modernization Act (NEIMA) uses the words “risk-informed,” and “performance-based,” there should be increased consideration of performance-based approaches.
- An individual from Framatome expressed concerns about the implicit conservatism that exists within the loss-of-coolant accident analysis, making transparency difficult.
- An individual from Rose Consultants stated that the staff should do more work on modernization from the perspective of NEIMA.
- At the conclusion of the discussion portion of the meeting, the staff asked the industry to provide their perspectives about whether the potential benefit to operating and new reactors was properly categorized for each focus area. The staff addressed each focus area making note of the items that the industry representatives felt were improperly categorized. In summary, staff received several inputs from participants informing that on a few issues (e.g., risk-informing application of the single failure criteria, and equipment qualification), staff had under-estimated the potential benefits for the operating plants.

- There were no additional comments made during the public comment portion of the meeting.

The meeting adjourned at 3:15 pm