



## Update Process for Approved Fuel Design and Safety Analysis Methods

Paul Clifford, Senior Technical Advisor  
Division of Safety Systems  
Office of Nuclear Reactor Regulation  
March 11, 2015

1

---

---

---

---

---

---

---

---



## Attributes

- Key attributes of an update process for approved fuel design and safety analysis methods:
  - Ability to update analytical models and methods without NRC review
    - Satisfy 50.59 screening requirements
  - Well defined boundaries for allowable changes
    - Itemized list of models
    - Specified thresholds triggering NRC review
  - Periodic self-assessment
  - Reporting requirements

2

---

---

---

---

---

---

---

---



## Challenges

- Challenges for the development and implementation of an update process:
  - Maintain oversight of approved models and methods
  - Prevent misuse of update process
  - Coordinate with existing regulations: Part 21, 50.59, and 50.46(a)(3)
  - Collection and assessment of new data
  - Documenting key attributes within each topical report
  - Revising previously approved topical reports?

3

---

---

---

---

---

---

---

---



## Going Forward

- Failure to reach consensus on an update process which provides both flexibility and responsibility may result in the following actions:
  - Required periodic assessments
  - Sunset clauses within staff safety evaluations
  - Withdrawal of approvals on legacy methods
- Public workshop in 2Q 2015 to address challenges for the development and implementation of an update process

4

---

---

---

---

---

---

---

---