



GEH Perspectives on an Update Process for Approved Nuclear Analysis Methods

2015 Regulatory Information Conference
March, 2015

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Current Process for Evaluation Models*

* RG 1.203 definition

- Develop/demonstrate, pre-application meetings, submit, review, RAIs, RAI response, SER, -A version 
- Becomes incorporated in licensing basis via COLR, TS bases, UFSAR
- Time consuming, expensive, doesn't provide finality
- Improvements/enhancements identified as technology evolves don't get implemented due to regulatory process uncertainty (cost and schedule) 

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Potential Advantages of New Approach

- Periodic update capability will help ensure methods are maintained current with technological advances
- Conditional updates without NRC review/approval would be more efficient and economical 
- Associated licensing bases (COLR, TS bases, UFSAR) would be more easily managed

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Challenges of New Approach

- Defining the conditional update framework
 - What requires NRC review and what doesn't?
 - Are detailed Limitations and Conditions sections in each topical report sufficient?
 - What happens to the –A process?
- Defining the regulatory framework that will permit this approach
 - Do we revise 10 CFR 50.59 to allow vendors to apply it (currently restricted to license holders)?



§ 50.59 Changes, tests and experiments.
(A) Changes for the purposes of this section:
(1) Changes for the purposes of this section:
(2) Change means a modification or addition to, or removal from, the Safety or provisions that affect a design function, method of performance, or condition of the facility, or an evaluation that demonstrates that licensed facilities will be accomplished.



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