




Today's Topical Report Process – Encouraging Efficient Innovation or Wasteful Stagnation

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Topical Reports: The Vision

► **What were we trying to accomplish with Topical Reports – the Vision?**


Vendors Licensees NRC Staff

► **The agreed upon Vision as stated by the NRC:**

A topical report allows for a single NRC review and (if appropriate) approval of a safety-related topic that may apply to multiple NPPs. In that way, it increases the efficiency of the licensing process and reduces the burden on licensees by minimizing the time and resources that both industry and the NRC staff could expend on redundant reviews of the same topic.

► **The Vision encouraged technological innovation while providing increased stability in the licensing process and minimizing wasteful, redundant licensee effort and NRC Staff review**

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Topical Reports: Is Today's Reality True to the Vision?

- ▶ The initial review and use goes generally as planned, with increased costs as the vision of future use of the Topical Report is fresh
- ▶ After the initial use, today the vision of continued use with minimal review is rarely realized. In short as an industry, WE REVIEW THE SAME TOPIC MULTIPLE TIMES!
- ▶ "Me Too" projects become virtual "First-of-a-Kind" projects, complete with full scale reviews and accumulated new review fees
- ▶ The reality today breeds regulatory uncertainty and wasteful, redundant expenditures, and encourages technological stagnation

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Topical Reports: What Do We Need To Stay True to the Vision?

- ▶ Good News: The Regulatory Structure in place is still fairly true to the Topical Report process Vision
- ▶ Good News: In the USA, we are a mature industry that has a long, solid and well-documented technological review history
- ▶ For Topical Reports to remain true to the Vision that promotes technological advancement and new product development/deployment, we need:
 - ◆ A single NRC review of the Topical Report with re-reviews for only significant, unreviewed changes to the Report, not the complete Report
 - ◆ A Topical Report change mechanism that credits regulatory conclusions in LAR SERs without the need for major re-reviews, thereby reducing regulatory uncertainty

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The Possibilities and Challenges: How Do We Get There From Here?

- ▶ First, the possibilities – is it a worthwhile goal: Reenergizing the Vision of the Topical Report Process will:
 - ◆ Reduce wasteful expenditure of Vendor, Licensee and Staff resources
 - ◆ Provide greater stability in the regulatory process
 - ◆ Encourage Technological Innovation
- ▶ The Challenges: With the Regulatory Structure in place, the primary challenges relate to implementing a disciplined process of development, submittal and review of licensing actions related Topical Reports. The process would result in:
 - ◆ A single NRC review of the Topical Report with re-reviews limited to changes to the Report, and not to the full Report
 - ◆ A Topical Report change mechanism that credits regulatory conclusions in LAR SERs without the need for major re-reviews
- ▶ Development of this process would require agreement among the stakeholders in the Topical Report Vision – Vendors, Licensee and the NRC Staff. When do we start?

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Closing Thoughts: A Vendor's Perspective

- ▶ Vendor's provide innovative solutions often translated into Licensee Action through the Topical Report Process
- ▶ Today, often Topical Reports are fully reviewed during initial and subsequent generic review processes as well as during each subsequent Licensee use process (e.g., LARs)
- ▶ The value of the Vendor's investment in the Topical Report diminishes rather than increasing with each review – resulting in waste of resources discouraging innovation
- ▶ Think of a process where the Staff's acceptances of an approved Topical Report in Licensee actions (e.g., LARs) are credited to the Topical Report without further generic review. Any plant specific nuances will be reviewed by the Staff in the next Licensee specific use of the Topical Report
- ▶ This is the initial Topical Report Vision reducing wasteful, redundant expenditure of resources and promoting technological innovations!!

Pedro Salas, AREVA – March 11, 2015 – p.7