Perspective on Proposed Topical Report Update Process

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Topical Reports

The NRC's stated purpose of TRs is to improve the efficiency of other licensing processes - i.e., license amendment requests (LARs).

- Once a TR is approved, LARs can reference it without the need for NRC to repeat a review of the technical content of the TR.
- Any revision or supplement to a TR must receive NRC review and approval.
- Generally TR review and approval is a low priority for NRC resulting in lengthy review period.

A process whereby a TR can be revised without requiring NRC approval could be beneficial.

- Need to clearly identify the criteria for when NRC approval is required.

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Current Issues with Topical Reports

There is no existing mechanism for NRC to notify industry when issues with an approved TR arise.

- Issues come to light during NRC review of an individual plant's license amendment request.
- NRC requests for information are issued to licensees but must be resolved by the owner of the TR.

However, licensees assume that approved TRs will not be "reopened" and vendor support will not be required to resolve NRC questions.

- Delay LAR approval / impact outage and budget

Even if a licensee works through the issue, a revision to the TR must still be pursued which subjects the TR to a second NRC review cycle.

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New Update Process

The proposed process includes “required periodic updates” of a TR based on the latest data “as that becomes available.”

- Need to address the expected actions for licensees.
  - Will adoption be required?
  - What is timeframe for adoption?

Introduces a level of risk based on uncertainties:

- When will data become available?
- What will the impact of the new data be on the TR conclusions?
- What will be the impact on the plant design basis?

May unintentionally discourage adoption of beneficial TRs.

NRC and industry should work together closely going forward.

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