

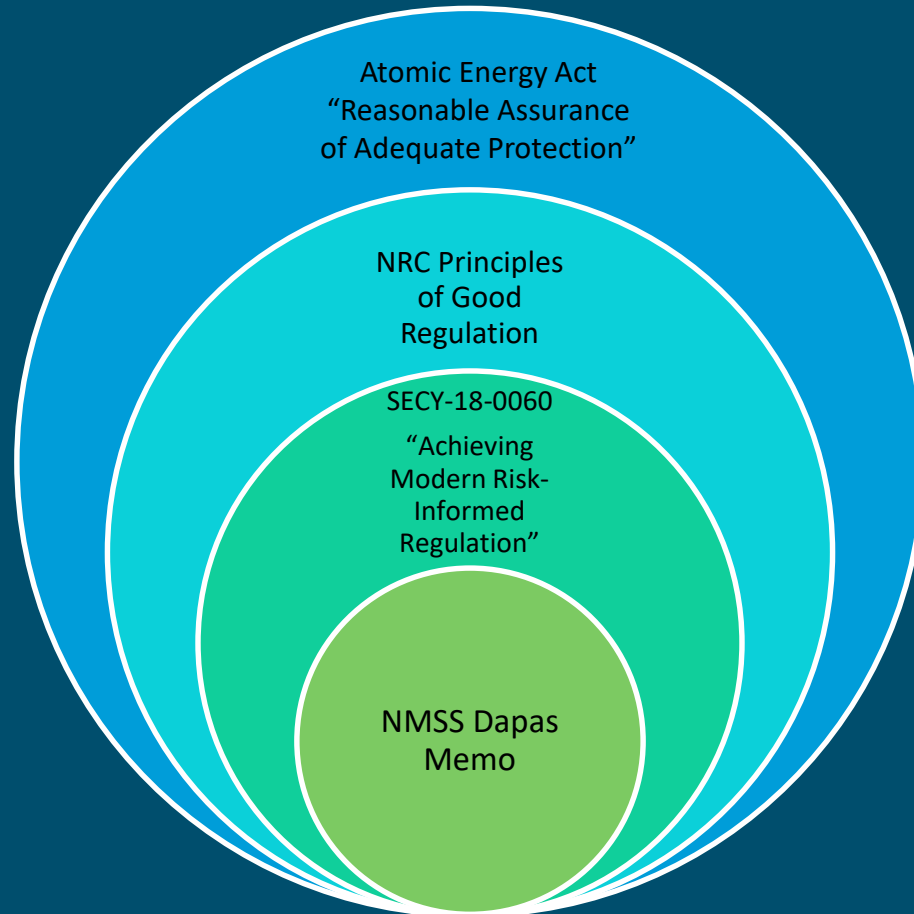


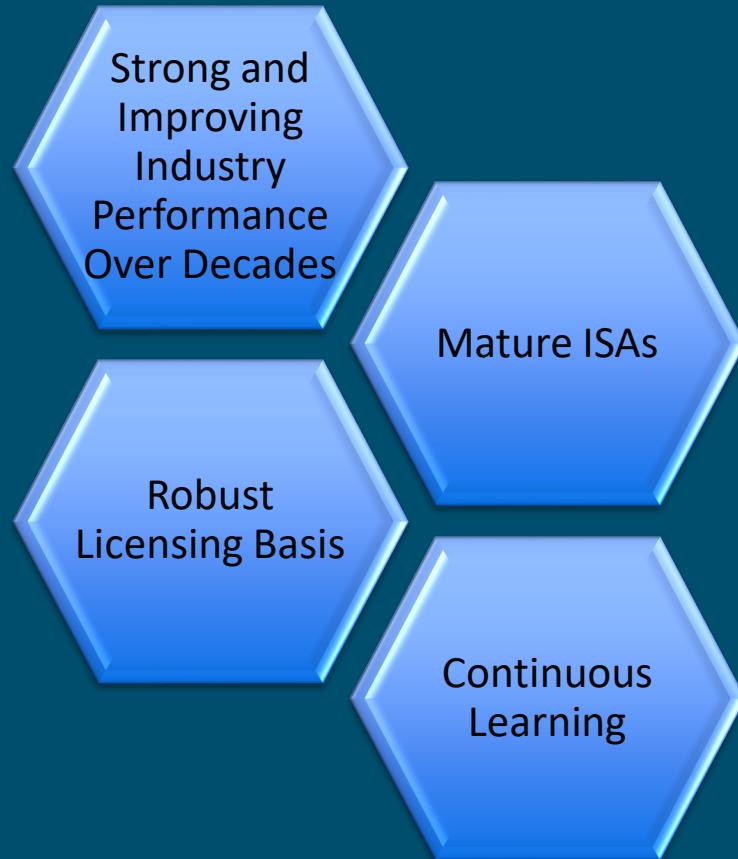
Building “Smarter” NRC Inspection and Licensing Programs – Industry’s Input and Perspectives

**NEI and its Fuel Cycle Facility
Members**

*NRC Public Meeting
May 2019*



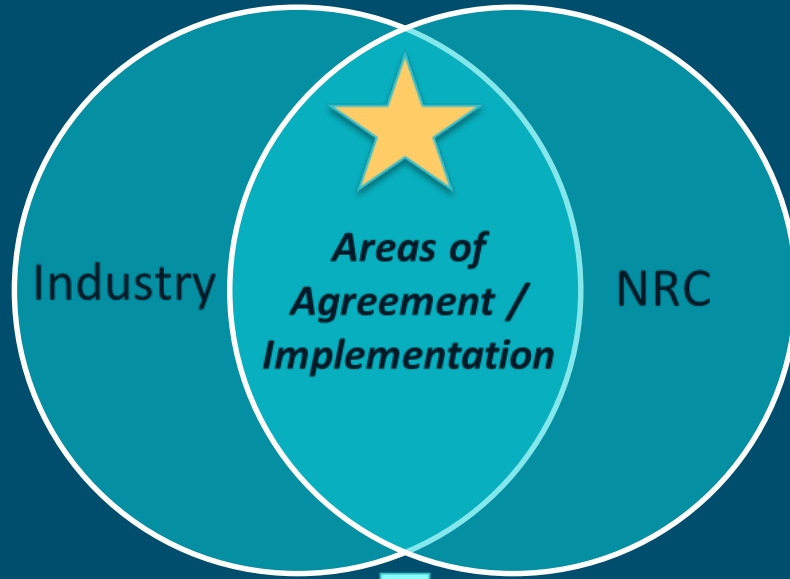




Efficiencies Can Be Gained

- Benchmark with Others
- Strong Project Management to help Ensure Timely and Effective Resolution of Issues
 - Staff and Management Turnover Pose Challenges

Success of Our Efforts Must be Measurable



Optimized Programs Lead to Reduced Resource Expenditures

Area 1: Acknowledgement of “Good” Performance

- What does that mean?
- What criteria should be used to define it?
 - e.g., sustained plant performance with no violations; self-identification
- How can License Performance Review process and findings be utilized in decision making?
- How does credit manifest itself? e.g.,
 - Reduced scope or frequency of inspection or both? (NMSS procedures allow a 50% reduction in frequency for certain materials licensees)
 - Reduced total number of hours

Area 2: Optimizing Inspection Procedures

- In-depth review of baseline/core hours; re-assess regulatory basis for each
- Re-scope content, focus, priorities based on historical inspection findings, operational events & conditions, expert judgment, ensure inspection activities have a safety benefit, etc.
- Bundle more Inspection Procedures
- Conduct biennial EP inspection and biennial EP observed drill in alternating years
- Transfer additional IPs to Resident Inspectors at Category I facilities, e.g., Waste Management, Transportation, Maintenance/Surveillance
- Remove PI&R inspection for those with accepted CAP
- Credit for robust self-assessments or internal/external independent audits, e.g., DOE-Navy, NUPIC, corporate cyber

Area 3: Managing Inspection Resources

- Preparation and Post Inspection Time: review of current practices; determine whether ratios are consistent among inspectors and appropriate for IP; establish maximum allowed; ensure appropriate scope for document requests
- Time on site: review of current IP hours; determine whether appropriate based on risk; establish maximum hours and allow for inspectors to reduce hours while on site if appropriate
- Travel Time and Related Costs –review of current practices; ensure travel time and related costs are efficient and cost effective e.g., inspection team members share rental cars

- **Area 1: Requests for Additional Information**
 - Clear regulatory basis for each RAI documented
 - Decision re: whether RAI issued in draft or final – pros/cons
 - Limited number of rounds of RAIs
- **Area 2: Licensing Milestones**
 - Solicit input from licensee and establish overall timeline that is documented on all licensing actions
 - Solicit input from licensee re: milestones from when licensing action is accepted until a final licensing decision/amendment or license is issued which are provided to licensee/applicant

- **Area 3: Licensing Process**
 - Benchmark with other NRC regulatory programs could identify efficiencies and management tools to ensure continuity
 - Renewals should focus only on areas of program change since licensees have “living” programs; diagnostic on past renewals
 - Continuity of quality and efficiency of licensing process is maintained despite staff and/or management turnover
 - Particularly challenging with protracted and more complex licensing actions – even more reason for established licensing milestones

- Does industry have suggestions for improvements to NRC's Enforcement Program or how it is implemented?
 - Alternate Dispute Resolution
 - All stakeholders must participate to avoid surprises
 - Current Severity Level enforcement examples