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July 10, 2020

MEMORANDUM TO: Christopher M. Regan, Deputy Director
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

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SUBJECT: PUBLIC VERSION OF THE SMARTER LICENSING ACTION PLAN AND
PROJECT STATUS

The enclosed action plan provides a publicly available summary of the Smarter
Licensing Action Plan.

Enclosure:
Smarter Licensing Action Plan
and Project Status (Public)

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SMARTER LICENSING ACTION PLAN AND PROJECT STATUS

Action Plan Overview:

Starting on April 26, 2019, the U.S. Nuclear Regulatory Commission (NRC) developed a charter for building a smarter fuel cycle licensing program (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19115A016), and directed the established Working Group (WG), to seek and evaluate input from stakeholders. On April 30, 2020, the NRC staff issued a report that included recommendations for addressing the collected suggestions from both internal and external stakeholders (ADAMS Accession No. ML20099F354). The WG initially prioritized the 37 suggestions on an individual basis.

This action plan provides a structured approach to grouping the implementation of the recommendations based on their common attributes. The actions are assigned to NRC staff teams to implement. Common attributes include relationships and overlaps between recommendations and/or activities that have already been initiated or are ongoing. These groupings will improve implementation resource efficiency.

The groups are sorted into three general categories:

1. Near-term actions anticipated to be completed by the first quarter (Q1) Fiscal Year (FY) 2021.
2. Mid-term actions anticipated to be completed by Q2 FY 2021.
3. Long-term actions with completion dates beyond Q2 FY 2021.

Structured Implementation

This section outlines the general guidance used to structure implementation.

- There is an overall Smarter Licensing Action Plan Project Manager.
- A small Implementation Team (I-Team) supports the Project Manager.
- Action teams are established to implement each group of recommendations.
- Each action team has a responsible branch chief, a lead staff member, and team members, as appropriate.
- Action teams review the recommendations associated with assigned suggestions. Decisions to take actions that differ from the recommendations will be discussed with the I-Team and management. If approved, the decision and any associated actions will be documented in an update to the plan.
- Action teams perform a cost-benefit evaluation to estimate the potential effectiveness and efficiency of implementing each recommendation.
- The I-Team, in coordination with the action teams, tracks progress and updates the action plan, as appropriate. Progress tracking includes time and cost, reports of changes to cost or schedule, and close-out reports for completed stages.

Action Plan Roles and Hierarchy

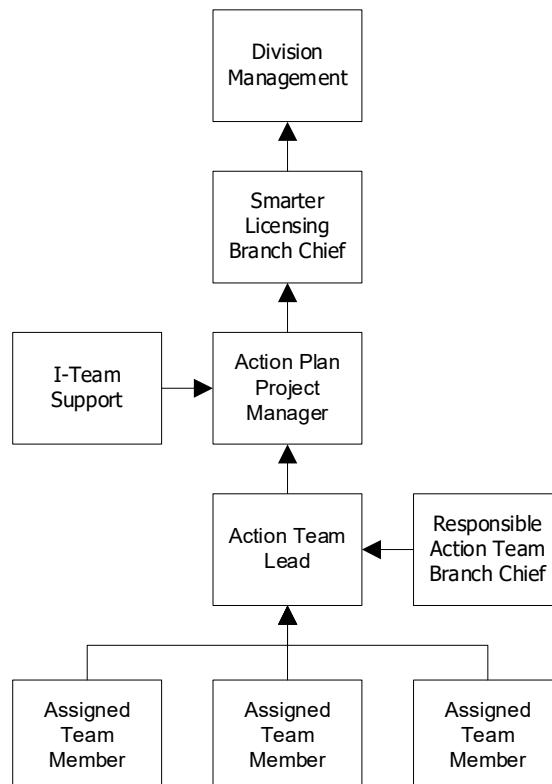
Project Manager – The Project Manager will have the overall responsibility for the action plan. The Project Manager will be responsible for developing and maintaining a tracking system to ensure that the overall project is completed in a timely manner. The Project Manager will be responsible for briefing management on the status of the actions and have an overall understanding of each action and status. The Project Manager will also be responsible for developing key messages, talking points, and briefing materials as requested. The Project Manager will maintain frequent contact with the various Action Team Leads. The Project Manager will arrange meetings of the responsible branch chiefs and division management, as requested.

I-Team – The Implementation Team will meet with the Project Manager periodically. This core team will be responsible for reviewing the solutions the Action Teams propose to address action items. The I-Team will also provide training on the cost-benefit evaluation.

Action Team – Each Action Team will have a responsible branch chief, a lead staff member and team members, as appropriate. Branch chiefs will assign the lead and team members. Because some actions involve ongoing activities, members of those Action Teams should include staff already assigned to those activities.

Action Team Lead – The Action Team Lead is responsible for taking actions to implement the assigned recommendations and measure their success, estimating the budget (FTE and contract funds, if appropriate) and performing the cost-benefit evaluation. The Action Team Lead is also responsible for completing the associated tasks and meeting milestones and target completion dates. The lead should establish these in cooperation with the Action Team and in consultation with the I-Team.

Diagram 1 – Hierarchy (note there are numerous, different action teams)



Communications and Action Plan Approach

Following the Hierarchy Diagram 1 above, the Project Manager and I-Team will contact the responsible branch chiefs for the assigned suggestions. The responsible branch chief aligns on the suggestions, milestones, and target completion dates with the appropriate Action Team Lead and Action Team members.

Progress Tracking

Stakeholder input and feedback was vital to this initiative in creating the Smarter Licensing suggestions. To inform the public on the action plans progress, the Project Manager will provide a progress update along with the completed recommendations at the semi-annual Cumulative Effects of Regulation meeting.

Near-Term Actions

NT 1 Process Guidance Associated with Project Manager and Licensee Periodic Interactions

As part of the merger activities within DFM, there is already an activity identified to develop guidance for processing licensing applications which will address the typical interactions between a project manager and the licensee. The recommendations associated with these activities are related to Suggestions 1, 2, 3, 6a, and a portion of 29.

NT 2 Licensee and Staff Meetings or Site Visits to Support Understanding the Application

This activity is related to improving the understanding of an application by the staff reviewers (including project managers, technical reviewers, OGC, etc.) as early as possible, such as during the pre-application or acceptance phases, especially for new, large, unique, or complex applications. The means for gaining this early understanding of an application should consider optimizing the staff's acquisition of knowledge, including site visits. The recommendations associated with these activities are related to Suggestions 4, 7b, and a portion of 27.

NT 3 Web-Based Licensing (WBL) and Metrics Considerations

As part of the merger activities within DFM, there is already an activity identified to enhance the WBL tool and its associated guidance which will address scheduling aspects and review metrics. The near-term task is related to the guidance activities. Any WBL tool improvements are addressed by LT 7. The recommendations associated with these activities are related to the guidance portions of Suggestions 5, 10, 17, and 28.

NT 4 Request for Additional Information (RAI) Guidance

As part of the merger activities within DFM, there is already an activity identified to develop guidance for the RAI process. The recommendations associated with this activity are related to Suggestions 7a, 8, 9a, 9b, a portion of 10, 11, 12, 13a, and a portion of 22.

Mid-Term Actions

MT 1 Guidance/Job Aids for Integrated Teams, Assignment and Alignment (A&A), and Review Scope/Focus

This activity involves the development of guidance and job aids to support the integration of review teams and early alignment on the scope, focus, and level of detail for reviews of license applications. The recommendations associated with this activity are related to Suggestions 15, 18, 21, 25a, a portion of 27, a portion of 29, 30, and 31. This activity may interface with other activities in this action plan (e.g., NT 1) and other guidance development activities (e.g., development of guidance for “Acceptance Reviews” and “Safety Evaluation Report”). Some aspects of this activity (e.g., specific review area/application job aids per Suggestion 30) will continue beyond this action as resources are made available, but as part of this action, the team will identify specific review areas and applications to develop as templates for the future activities.

Long-Term Actions

LT 1 Management Turnover Guidance/Expectations

While there is an implicit expectation and a good practice to have effective management (i.e., branch chief and above), there is currently no specific guidance describing the elements of effective management turnover, especially in the context of the continuity of licensing action reviews. This activity involves the development of more formalized guidance and/or expectations associated with management turnover, along with transition plan templates or job aids. The recommendations associated with this activity are related to Suggestion 13b, which interfaces with the activities related to the recommendations associated with Suggestions 24 and 25b (LT 4).

LT 2 License Renewal Guidance Development

This activity involves the development of more formalized guidance and/or expectations associated with performing reviews of license renewal applications. The recommendations associated with this activity are related to Suggestion 14 and 23.

LT 3 Greater Than Critical Mass (GTCM) Guidance Development

This activity involves the development of more formalized guidance and/or expectations associated with performing reviews of GTCM applications. The recommendations associated with this activity are related to Suggestion 20.

LT 4 Roadmap/Catalog for Guidance and Licensing Information

This activity involves the development of a roadmap to the appropriate regulations, guidance, procedures, job aids, etc. for each type of license. This activity also involves developing a catalog of references for each licensee/applicant or license type that is easily accessible to the staff (e.g., cross-reference listing or links on a Sharepoint site) and maintained up-to-date by each appropriate project manager. Furthermore, this activity involves developing templates to ensure the various types of licensing basis documents are profiled in ADAMS consistently. The recommendations associated with this activity are related to Suggestions 24 and 25b.

LT 5 Lessons Learned Activities to Prepare for New Types of Applications

This activity involves performing lessons learned following large-scope application reviews that are new or novel to support review improvements for future new types of applications (e.g., preparing for applications for pebble bed fuel fabrication, medical isotopes, accident tolerant fuel applications, etc.). The recommendation associated with this activity is related to Suggestion 26.

Note that there are three actions that are considered on-going activities within or in parallel with the other actions addressed in the action plan. These actions are not addressed as separate implementation actions. Rather, they are integrated within the achievement of the other actions addressed by the plan. As such, no separate schedule or metric is assigned to the following items:

1. The recommendations associated with Suggestion 16 are achieved by making the guidance developed for the other actions publicly available, as appropriate.
2. The recommendations associated with Suggestion 19 are achieved by developing knowledge management and/or training modules following the completion of the other actions, as appropriate.
3. The recommendations associated with Suggestion 32 are achieved with the development of the guidance from the other actions in the action plan that also harmonizes the staff guidance as part of merging the fuel cycle and spent fuel arenas into a single division of fuel management.