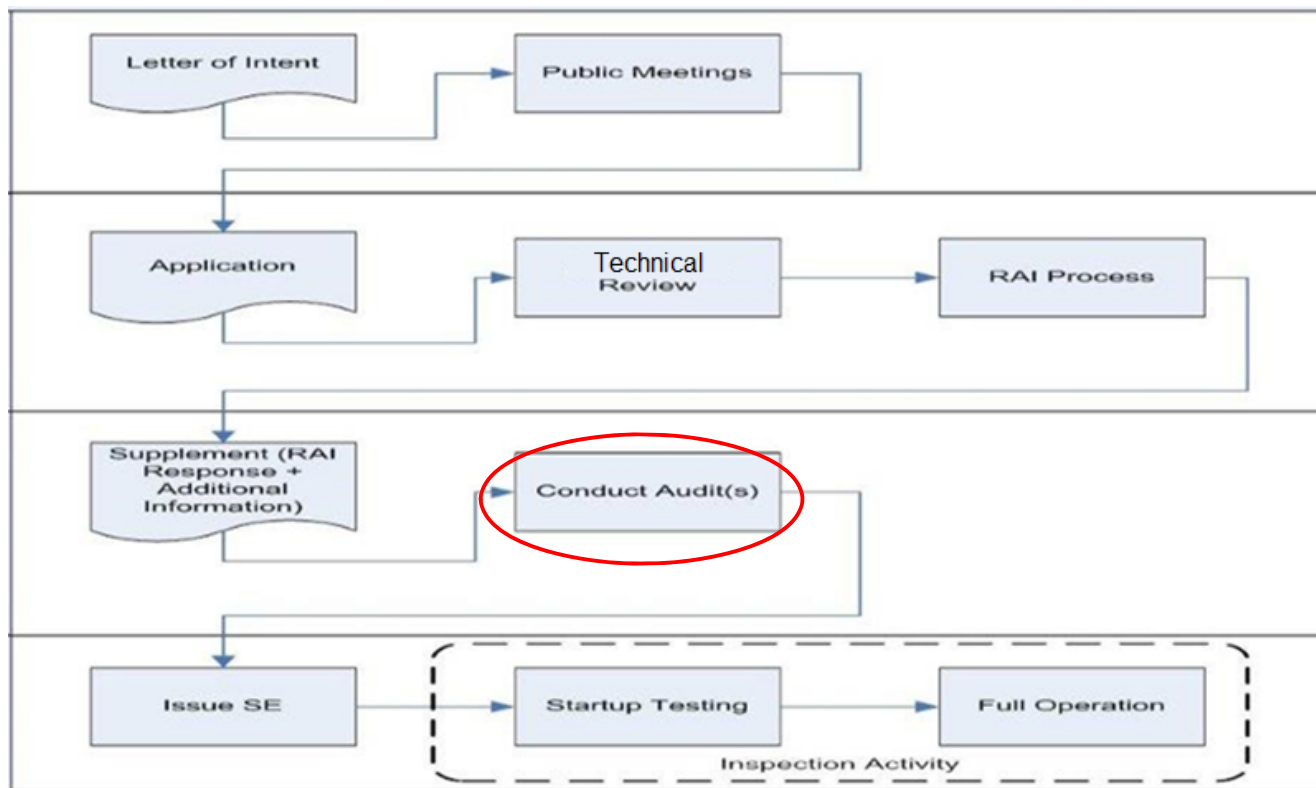




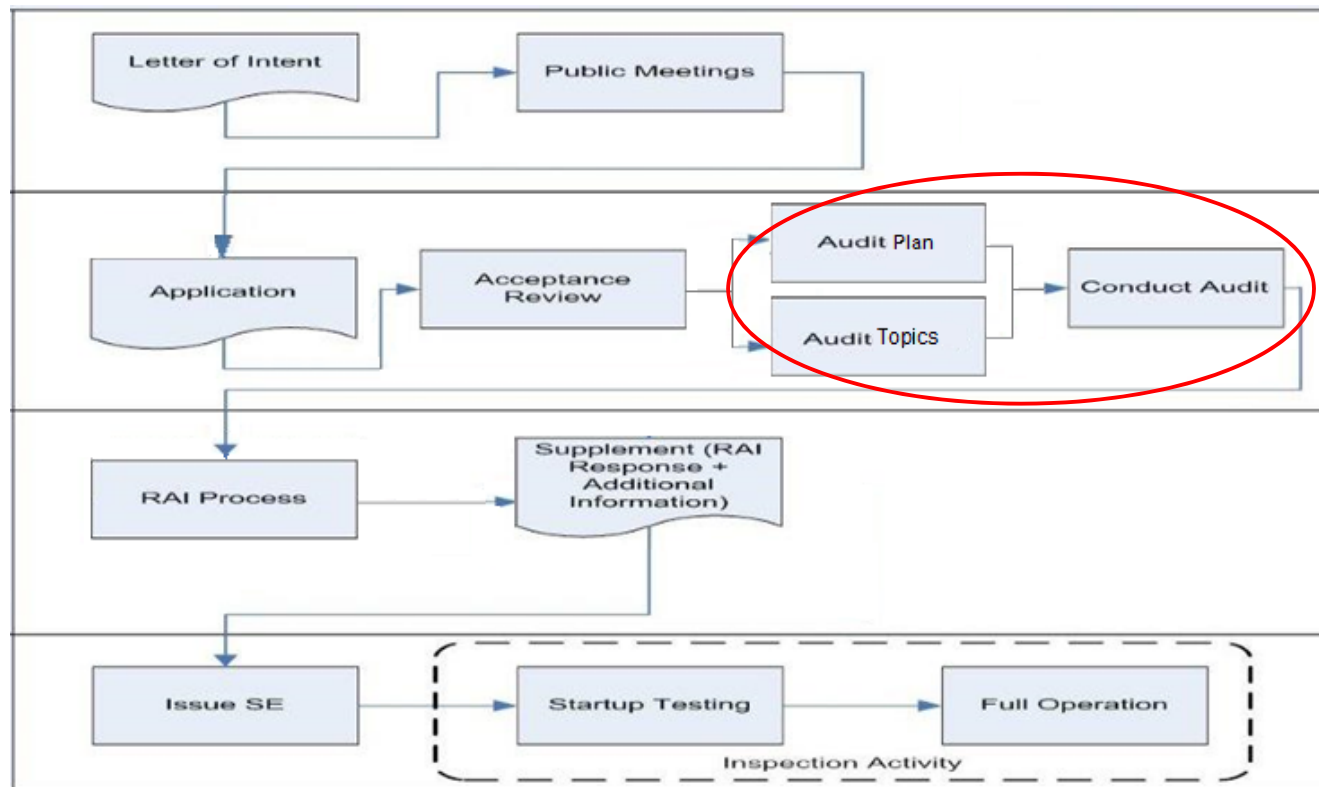
Regulatory Audits and Requests for Confirmation of Information

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NRC Regulatory Audit



NRC Regulatory Audit





NRC Regulatory Audit

Will I be audited if my system is not very complex?

It depends upon complexity of the licensing action:

- One or more audits will be conducted for license renewal
- I&C audits will typically be performed across the board, for all I&C amendments

Are audits done immediately and can they cause my application to be rejected or rescinded?

No, audits are performed after NRC staff has reviewed the material docketed, accepted the application, and determined that additional information is necessary



NRC Regulatory Audit

You submitted an application for a licensing action and the NRC says they want to conduct an audit ...

What do you think you need to do?



Should the audit process be desperately feared?



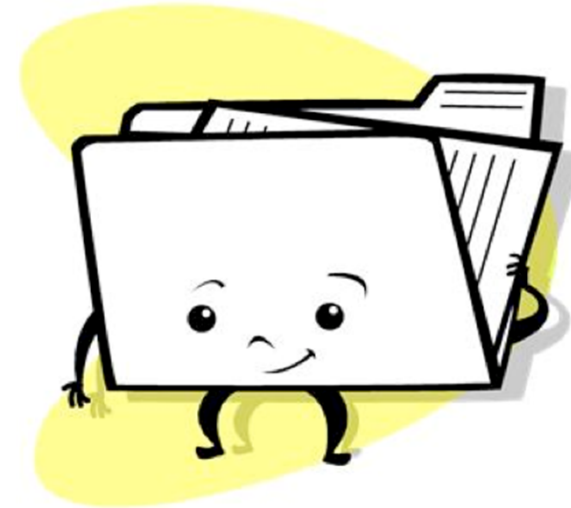
Not at all... NRC staff just need response to a few questions -

- The NRC purpose is to look at evidence that shows the design details support a conclusion that the system will perform the safety functions

NRC staff will prepare an audit plan

What is in this plan?

- goal and objectives for the audit,
- regulatory basis,
- activities to be performed,
- Participants and their roles,
- schedule, and
- information to be available during the audit



So, what happens during the audit?

At the beginning -

- NRC staff will discuss the items identified in the audit plan

During -

- NRC staff will review documents and talk to the designers
- Show how the system works

And at the end -

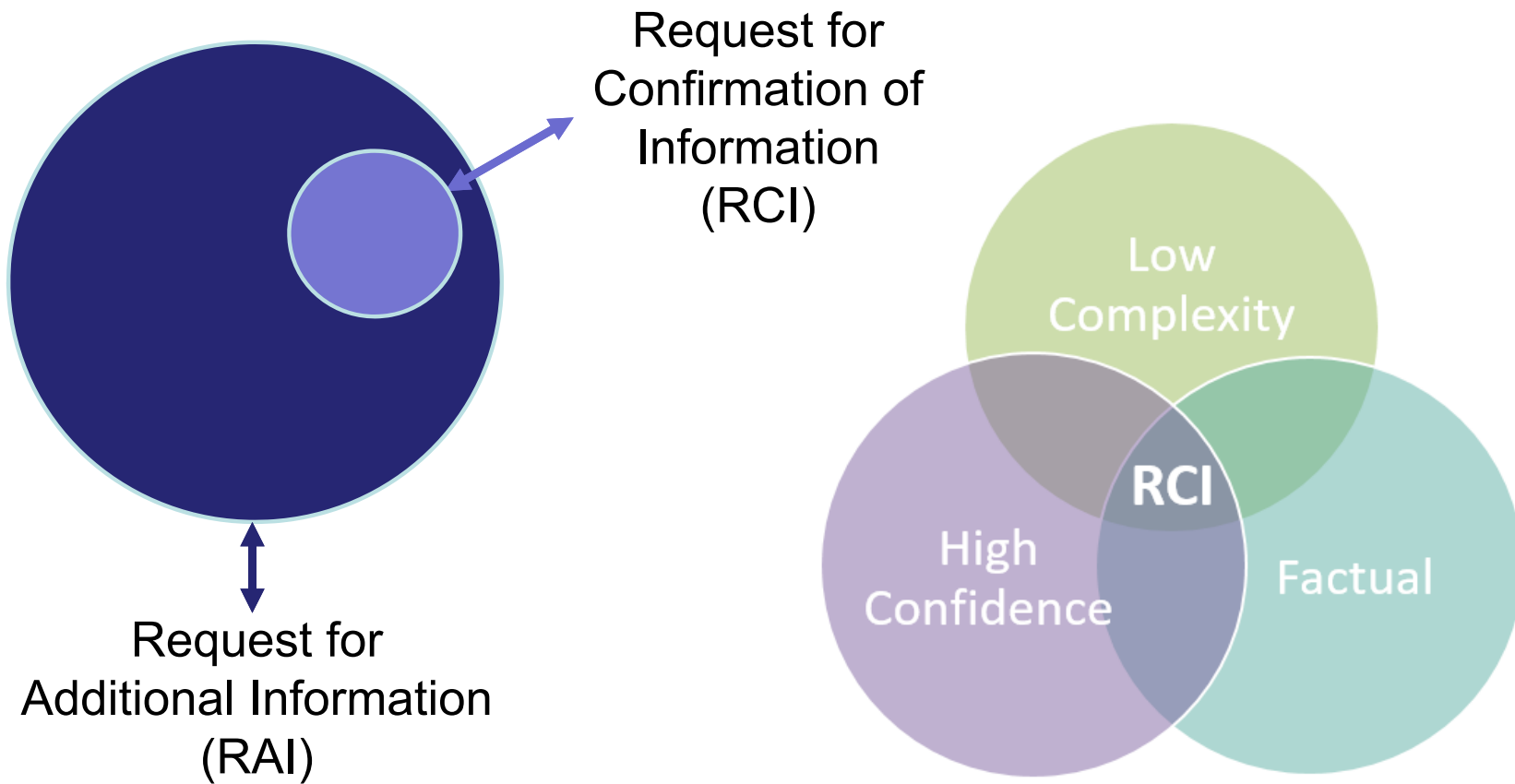
- Summarize activities performed and preliminary results



NRC Requests for Information

- **Request for Additional Information**
 - Formal letter to request necessary technical information on the docket in support of NRC staff reviews
- **Request for Confirmation of Information**
 - a streamlined process to docket necessary information, where the information is factual, of low complexity, and staff has high confidence in what would be reported by the licensee.

NRC Requests for Information



Typical RAI – Format – Before RCI:

- “To accurately identify the internal Environment for the “Flex Connections”, the staff request that the Applicant specifically identify where the “Flexible Connections” to be subjected to [an aging management review], are located.”

Converted to an RCI

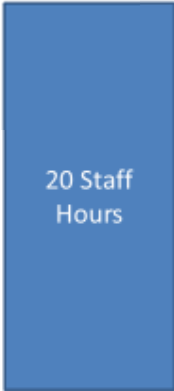
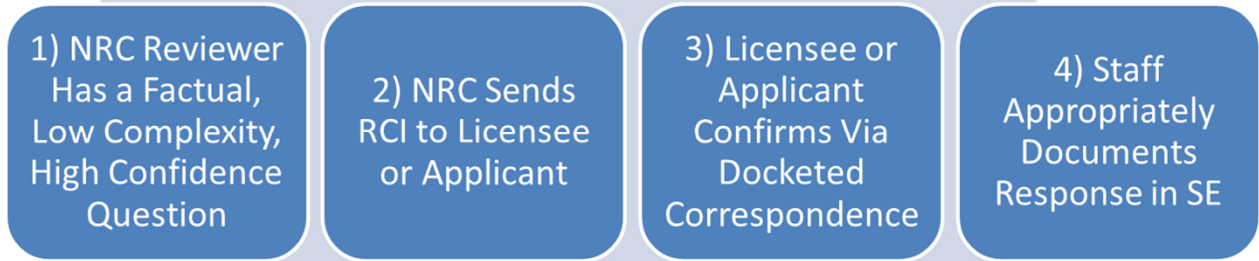
- “During the audit the applicant indicated that although flexible connections are not shown on [the applicable drawing], **they are exposed to an internal environment of indoor air.**”

Licensee or Applicant Response

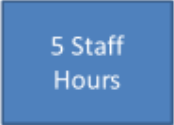
- “This information has been **confirmed** to be correct as stated.”

Questions?





Typical RAI



Typical RCI

This does not include licensee effort savings.

Estimate based on PM experience with RCI's and License Renewal