



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001**

July 29, 2021

MEMORANDUM TO: Shana R. Helton, Director  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

THRU: Jacob I. Zimmerman, Chief  
Fuel Facility Licensing Branch  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

FROM: Jonathan G. Rowley, Project Manager  
Fuel Facility Licensing Branch  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

A handwritten signature in cursive script that reads "Jonathan Rowley".

SUBJECT: SUMMARY OF JUNE 15, 2021, DISCUSSION WITH FUEL FACILITIES  
ON SAFETY MARGIN, SMARTER LICENSING, AND LOW SAFETY  
SIGNIFICANCE ISSUE RESOLUTION

The staff of the U.S. Nuclear Regulatory Commission (NRC) conducted a virtual meeting with representatives of the Nuclear Energy Institute (NEI), fuel cycle industry, and members of the public on June 15, 2021. The purpose of this meeting was to discuss the status of three specific initiatives involving the fuel cycle industry. The three topics discussed during the meeting were the status of Safety Margin Activities, status of the Smarter Licensing Program, and status of Low Safety Significance Issue Resolution.

The public meeting notice with the agenda topics and the meeting presentations are available in the Agencywide Documents Access and Management System (ADAMS) under Accession Nos. ML21162A066 and ML21162A043, respectively. The list of attendees is in the enclosure. No regulatory decisions or commitments were made during the meeting.

CONTACT: Jonathan Rowley, NMSS/DFM  
301-415-4053

### **Status of Safety Margin**

NEI gave a presentation detailing the fuel cycle industry concerns with the latest revision of Inspection Manual Chapter (IMC) 0616 issued on April 1, 2021. NEI requested the NRC provide a response to its comments on IMC 0616 provided in its May 2020, July 2020, and April 2021 letters as they raise both generic concerns and provide specific edits. The NRC asked clarifying questions, provided its perspective and indicated that a documented response will be provided.

The NRC lead for Safety Margin then led the NRC presentation outlining the NRC staff positions on the Safety Margin issue. The NRC presentation indicated that, while it understood the industry's views, the NRC position is final. NEI expressed concern that its comments on IMC 0616 were not incorporated into the NRC decisionmaking. The NRC and NEI agreed that continued discussions may be necessary depending on when the final official NRC position is documented.

### **Status of Smarter Licensing Program**

The NRC Project Manager (PM) leading Smarter Licensing provided a status of the Smarter Licensing Program. The PM informed NEI of the near-term, mid-term, and long-term plans to implement the Smarter Licensing Program recommendations into the Division Instructions.

NEI complimented the NRC on its informative Smarter Inspection Program Web page and suggested that the NRC develop a Web page for the Smarter Licensing Program analogous to the Smarter Inspections Program Web page. NEI and industry also offered to assist the NRC staff with prioritizing the long-term activities.

### **Status of Low Safety Significance Issue Resolution**

The NRC Senior Level Advisor leading Low Safety Significance Issue Resolution (LSSIR) provided a status update on the LSSIR activities. NEI was informed of experience from one inspection-related tabletop exercise that was performed in the second quarter of the calendar year, and this exercise was informing some changes in the progressive screening process that the NRC staff had developed. The NRC sought examples from the industry to support additional tabletops. The NEI recognized that the industry was not finding additional good inspection issues to tabletop. The NRC indicated that the LSSIR initiative would likely transition in the near future to addressing similar types of issues in the licensing arena going forward.

### **Action Items**

The following action items resulted from the discussions during the meeting:

#### ***Safety Margin***

1. NRC agreed to provide a response to NEI's comments in its 2020 and 2021 letters.

#### ***Smarter Licensing***

2. The NRC likes the idea of a Web page for the Smarter Licensing Program, and shall investigate the feasibility of implementation.

***Low Safety Significance Issue Resolution***

3. The NRC will continue to provide a status to the industry as the initiative progresses into the licensing arena.

Enclosure:  
List of Attendees

**SUBJECT:** SUMMARY OF JUNE 15, 2021, DISCUSSION WITH FUEL FACILITIES ON SAFETY MARGIN, SMARTER LICENSING, AND LOW SAFETY SIGNIFICANCE ISSUE RESOLUTION

**DATED:** July 29, 2021

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| <b>OFFICE</b> | DFM/FFLB/PM* | DFM/FFLB/LA* | DFM/FFLB/BC* | DFM/FFLB/PM* |
| <b>NAME</b>   | JRowley      | ELee         | JZimmerman   | JRowley      |
| <b>DATE</b>   | 07/28/2021   | 07/29/2021   | 07/29/2021   | 07/29/2021   |

**OFFICIAL RECORD COPY**

LIST OF ATTENDEES

FEBRUARY 25, 2021 PUBLIC MEETING WITH INDUSTRY TO DEMONSTRATE THE U.S.  
NUCLEAR REGULATORY COMMISSION ONLINE WEB-BASED RELIEF REQUEST PORTAL  
REGARDING PROPOSED ALTERNATIVES

| <b>Name</b>          | <b>Affiliation</b>                       |
|----------------------|--|
| Matt Bartlett        | U.S. Nuclear Regulatory Commission (NRC) |
| Mike Call            | NRC                                      |
| Leira Cuadrado       | NRC                                      |
| Suzanne Dennis       | NRC                                      |
| Marilyn Diaz         | NRC                                      |
| Yaira Diaz           | NRC                                      |
| Patrica Glenn        | NRC                                      |
| Gregory Goff         | NRC                                      |
| Michael Greenleaf    | NRC                                      |
| Donnie Harrison      | NRC                                      |
| Shana Helton         | NRC                                      |
| Janelle Jessie       | NRC                                      |
| Nathan Mackey        | NRC                                      |
| Nicholas Mertz       | NRC                                      |
| Eric Michel          | NRC                                      |
| Alayna Pearson       | NRC                                      |
| Francis Peduzzi      | NRC                                      |
| Christopher Regan    | NRC                                      |
| Timothy Sippel       | NRC                                      |
| Osiris Siurano-Perez | NRC                                      |
| Pual Startz          | NRC                                      |
| LaDonna Suggs        | NRC                                      |
| Jennifer Tobin       | NRC                                      |
| Thomas Vukovinsky    | NRC                                      |
| Shakur Walker        | NRC                                      |
| Robert Williams      | NRC                                      |
| Richard Jervey       | NRC                                      |
| David Spangler       | BWXT Nuclear Operations Group Inc.       |

|                   |                                |
|-------------------|--------------------------------|
| David Adams       |                                |
| Lindsey Cooke     |                                |
| Patricia Donnelly |                                |
| Tim Tate          | Framatome                      |
| Scott Murray      | Global Nuclear Fuel - Americas |
| Andrew Zach       | EPW                            |
| Jennifer Wheeler  | X-Energy                       |
| Janet Schlueter   | Nuclear Energy Institute       |
| Robert Link       | Nuclear Energy Institute       |
| Wyatt Padgett     | Urenco USA                     |