

October 14, 2014

MEMORANDUM TO: Marissa G. Bailey, Director  
Division of Fuel Cycle Safety, Safeguards,  
and Environmental Review  
Office of Nuclear Material Safety  
and Safeguards

FROM: Matt Bartlett, Project Manager **/RA/**  
Enrichment and Conversion Branch  
Division of Fuel Cycle Safety, Safeguards,  
and Environmental Review  
Office of Nuclear Material Safety  
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SUBJECT: SUMMARY OF SEPTEMBER 22-23, 2014, MEETING WITH THE  
NUCLEAR ENERGY INSTITUTE AND STAKEHOLDERS TO DISCUSS  
FUEL CYCLE REGULATORY ACTIVITIES AND THE CUMULATIVE  
EFFECTS OF REGULATION

The staff of the U.S. Nuclear Regulatory Commission (NRC) met with the fuel cycle industry, the Nuclear Energy Institute (NEI), and members of the public on September 22 and 23, 2014, in Rockville, Maryland. The purpose of the Category 2 public meeting was to discuss the cumulative effects of regulation; updates to NUREG-1520, Revision 2, "Standard Review Plan for License Applications for Fuel Cycle Facilities"; the Corrective Action Program (CAP); and the generic letter on "Natural Phenomena Hazards for Fuel Cycle Facilities." The meeting announcement for these items is available in the Agencywide Documents Access and Management System (ADAMS) under the accession number ML14252A513.

On Monday afternoon, the NRC staff presented updates to the regulatory items listed on the fuel cycle Integrated Schedule and Supplement (<http://www.nrc.gov/materials/fuel-cycle-fac/regs-guides-comm.html#cumeffects>). The NRC staff also presented an overview of proposed revisions to NEI's draft Regulatory Issue Resolution Protocol (RIRP) (ADAMS No. ML14149A423). The RIRP provides a step-by-step procedure to identify, track, and bring to closure generic regulatory initiatives. The takeaway from the meeting was for the NRC staff to update the fuel cycle Integrated Schedule and Supplement on the NRC public website. The NRC staff will also incorporate final comments on the RIRP and provide the updated draft to NEI. NRC and industry agreed that the goal is for industry to submit a revised protocol based on NRC input and receive NRC endorsement by the end of 2014.

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On Tuesday morning, the NRC staff provided an overview of revisions to NUREG-1520, Revision 2 entitled, "Standard Review Plan for License Applications for Fuel Cycle Facilities." The revisions to each chapter were discussed and the industry and NEI provided feedback on the drafts. Industry also commented that due to the evolving nature of some subject areas, e.g., security and a dermal/ocular standard, that NRC should consider delaying the update until several related regulatory initiatives are resolved. Industry comments will be provided in writing for NRC's consideration.

During the session on CAP, the NRC staff provided a presentation on inspection procedure (IP) 88161, "Corrective Action Program Implementation at Fuel Cycle Facilities (ADAMS Accession No. ML14178A494) to show how the IP is related to Regulatory Guide 3.75, "Corrective Action Programs for Fuel Cycle Facilities" (ADAMS Accession No. ML14139A321). Industry representatives asked clarification questions regarding CAP and offered to provide written comments on the IP. The NRC staff welcomed any comments that would be submitted in writing on the IP and indicated that NRC would consider them in future updates to the IP.

The NRC staff provided a slide presentation on the draft generic letter, "Treatment of Natural Phenomena Hazards in Fuel Cycle Facilities." The draft generic letter was issued on August 8, 2014, for a 90-day public comment period. Industry plans to submit comments for NRC's consideration. The purpose of the generic letter is to request information to verify assumptions in the facilities integrated safety analyses regarding protection against the occurrence of natural phenomena hazard events. The NRC staff provided a discussion on each set of requested actions in the generic letter as well as a discussion of the process to issue the generic letter. Industry asked clarifying questions and noted that much of the requested information is available in existing facility-specific Integrated Safety Analyses. The NRC staff noted that the generic letter would be vetted with the NRC's Committee to Review Generic Requirements to ensure appropriate NRC staff conformance with NRC backfit requirements. The draft generic letter can be accessed in ADAMS (Accession No. ML13157A158).

Following each slide presentation, the NRC, NEI, and industry representatives held general discussions. The slides for each presentation are included in Enclosure 1 and the attendees list is provided in Enclosure 2. No regulatory decisions or commitments were made during the meeting.

Enclosures:

1. Slide Presentations
2. Attendance List

cc w/enclosures:

Janet Schlueter

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