

# Cumulative Effects of Regulation

Presenter: Matt Bartlett

NRC Project Manager NMSS/FCSS

301-287-9112, [matthew.bartlett@nrc.gov](mailto:matthew.bartlett@nrc.gov)

# Introduction

- **CATEGORY 2 MEETING**
  - The primary discussions are expected to be between the NRC, the Nuclear Energy Institute and industry representatives. Members of the public will be invited to participate at designated points during the meeting.
- **REMINDER**
  - The timelines presented are based on best estimates, but may change based on pressing safety issues or other Commission priorities.

# CER Agenda

- **Updated Integrated Schedule**
- **Points of Interest on Integrated Schedule**
- **Regulatory Issue Resolution Protocol (RIRP)**
- **Comments on RIRP**

# Integrated Schedule

Regulatory Activity	Revised	2014												2015												2016												2017												2018											
		A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D			
<b>Part 20-Rdtn Protection</b> POC: Cardelia Maupin Driver: SRM	09/15/2014	[Schedule bars: yellow, green, blue]												Pre-rulemaking analysis ongoing												Seek Commission Approval of Draft Reg. Basis																																			
<b>Part 21-Quality Assurance</b> POC: Sabrina Atack Driver: Staff	09/15/2014	[Schedule bars: blue, yellow, green]												Draft Reg Basis												Develop Proposed Rule												Issue Proposed Rule												Review by Commission											
<b>Part 26-Fatigue</b> POC: A. Sapountzis Driver: SRM	09/15/2014	[Schedule bars: blue, yellow, green]												[Schedule bars: blue, yellow, green]												[Schedule bars: blue, yellow, green]												[Schedule bars: blue, yellow, green]												[Schedule bars: blue, yellow, green]											
<b>Part 73-Mtrl Attractiveness</b> POC: A. Sapountzis Driver: SRM	09/15/2014	[Schedule bars: blue, yellow, green]												Draft Regulatory Basis												Develop Proposed Rule												Proposed Rule to Commission												Draft Final Rule to Commission											
<b>Part 40-Source Material ISAs</b> POC: David Tikitsky Driver: SRM	09/15/2014	[Schedule bars: green]												Commission Action Letter Proposing Path Forward																																															
<b>Part 61 - LLW Disposal</b> POC: Gary Comfort Driver: SRM	09/15/2014	[Schedule bars: orange, green]												Draft to Commission												[Schedule bars: orange, green]												[Schedule bars: orange, green]																							
<b>Part 70, Appendix A</b> POC: Booma Venkataraman Driver: Industry	09/15/2014	[Schedule bars: green]												[Schedule bars: green]												[Schedule bars: green]												[Schedule bars: green]																							
<b>Part 74-MC&amp;A</b> POC: Tom Pham Driver: SRM	09/15/2014	[Schedule bars: green]												Discuss meaning of previous comments												[Schedule bars: green]												[Schedule bars: green]																							
<b>Chemical Security</b> POC: J. Hammelman	09/15/2014	[Schedule bars: green]												Notation Vote Paper for Commission Direction																																															
<b>Cyber Security</b> POC: Brian Smith	09/15/2014	[Schedule bars: green]												Seek Commission Direction																																															
<b>ANS 57.11 (ISA)</b> POC: Kevin Morrissey Driver: SRM	09/15/2014	[Schedule bars: green]												Final ANS Standard												Draft ISG, if Applicable												Final ISG, if Applicable																							
<b>NUREG-1520</b> POC: Soly Soto Driver: Staff	09/15/2014	[Schedule bars: green]												Final NUREG												[Schedule bars: green]												Begin Revision 3																							
<b>Dermal and Ocular</b> POC: Marilyn Diaz Driver: Staff/SRM	06/09/2014	[Schedule bars: green]												Issue Draft ISG																																															
<b>Soluble Uranium (ISG)</b> POC: Chris Ryder Driver: SRM	09/15/2014	[Schedule bars: green]												Draft ISG												Final Guidance																																			
<b>RFCOP &amp; CAP</b> POC: Kurt Cozens Driver: SRM	09/15/2014	[Schedule bars: green]												Issued Reg. Guide and Inspection Procedure												[Schedule bars: green]												[Schedule bars: green]																							
<b>MC&amp;A Reg. Guides</b> POC: Osiris Siurano Driver: SRM	09/15/2014	[Schedule bars: green]												[Schedule bars: green]																																															
<b>Natural Phenomena Hazards</b> POC: Jonathan Marcano Driver: Staff & SRM	09/15/2014	[Schedule bars: green]												90 days to respond to generic letter												[Schedule bars: green]												[Schedule bars: green]																							
<b>FCIX</b> POC: Maria Guardiola Driver: Staff	04/30/2014	[Schedule bars: green]												[Schedule bars: green]												[Schedule bars: green]												[Schedule bars: green]																							

●/● = Meetings  
 I = Marks a milestone with text  
 [Blue] = Regulatory Basis/Draft Guidance  
 [Orange] = Proposed Rule/Draft Guidance  
 [Green] = Final Rule/Final Guidance  
 [Yellow] = Public Interaction  
 [Pink] = Implementation  
 ↓ = Change occurred in the box below arrow  
<http://www.nrc.gov/materials/fuel-cycle-fac/cer-integrated-schedule.xlsx>

# Regulatory Issue Resolution Protocol (RIRP)

- **Purpose:** Establish a process to handle generic regulatory issues
- **5 Phases:** Identification, Screening, Planning, Implementation, & Closure
- **Objects:** Improve communications, define problem statement, & ensure durable resolution

# Step 1: Identification Phase, 3.2.1- pg. 3

- **Assign a Point of Contact**
  - e.g., NRC project manager
- **Identify Generic Issue**
- **Share with other organization**
  - Appendix A: Regulatory Evaluation Summary



- **Regulatory Issue Screening Form**
  - Answer question in Appendix B.
  
- **Accept – Interact within 60 days**
  - Mutual understanding of the issue
  
- **Commit Necessary Resources**

- **Form Teams**
  - POC
  - Management oversight
  - Technical experts
  
- **Develop the Issue Resolution Project Plan**
  - Appendix D within 60 days
  - Problem statement and success criteria
  - Regulatory basis
  
- **Agree on scope of activities**



## **Step 4: Implementation Phase, 3.2.4**

**– pg. 5**

---

- **Create Draft Documentation**
- **Interact with Stakeholders**
- **Resolve Comments**
- **Produce Durable, Documented Product**

## **Step 5: Closure Phase, 3.2.5 – pg. 5**

- **Complete Issue Closure Form**
  - Appendix E – Issue Closure Form
- **Develop Problem Closure Statement**
- **Document Resolution**

# Comments on the Draft Process

- **“understanding” versus “agreement”**
  - RIRP, pg. 1
- **“e.g., ... endorse industry approach”**
  - RIRP, pg. 1
- **“stakeholders” versus “NEI/Industry”**
  - RIRP, pg. 3, 4, C-2, and E-1
- **The regulatory basis is not a stand alone document (i.e., differs from rulemaking)**
  - RIRP, pg. 4

# Summary

- **Maintain Integrated Schedule and Supplement**
- **Finalize RIRP**
- **Path Forward on RIRP**
- **Next Quarterly Meeting in January (???)**

End of slide show, Esc to exit













# Part 70 Appendix A, Reportable Safety Events

4	2015												2016												2017																							
S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O											

**Key Information on Part 70 Appendix A, Reportable Safety Events:**

- Rulemaking to revise the number of days that would be allowed for a licensee to submit the written follow-up report after discovery of the event, to update the reporting framework for certain situations and to remove redundant reporting requirements.
- This is a direct final rulemaking.

**Meeting Information:**

- None scheduled.

**Contact:**  
 Booma Venkataraman,  
[NMSS/FCSS/PORSB](#),  
 301-287-9143









# Part 74 Material Control & Accounting of Special Nuclear Material

4	2015												2016												2017										
	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J
	↓		↓		↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓																	
	●																																		
Discuss meaning of previous comments																																			

**Key Information on Part 74, Material Control and Accounting of SNM:**

- The comment period on draft rule and guidance was extended and now ends on March 10, 2014.
- The schedule has been rebase lined to extend the completion date by one year to allow resolution of comments.

**Meeting Information:**

- September 25, 2014 – Public meeting to discuss and clarify the purpose of comments from stakeholders.

**Contact:**  
 Tom Pham,  
[NMSS/FCSS/MC&AB](#),  
 301-287-9132



# Cyber Security

2014									2015									2016														
A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D

# Chemical Security

4				2015												2016											
S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	
																					</						













# MC&A Reg. Guides

4				2015												2016								
S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S
↓				↓																				
█				█																				

## Key Information on Material Control and Accounting Regulatory Guides:

- The purpose of this effort is to consolidate and eliminate outdated guidance as requested by the Chairman.
- 27 MC&A guidance documents are consolidated into 7 documents.
- Staff expects to complete the draft Regulatory Guides and technical basis for public comments by September 2014.
- The Regulatory Guides may be issued for public comment individually, as they complete concurrence.
- None of the integrated Regulatory Guides are impacted by ongoing draft rulemaking of 10 CFR 74.

## Meeting Information:

- September 2014, 30 day comment period for Draft Regulatory Guides for Material Control and Accounting.

**Contact:**  
Osiris Siurano,  
[NMSS/FCSS/EUB](#),  
301-287-9070





# FCIX

4	2015												2016												2017												2018										
	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J

**Key Information for RFCOP on Fuel Cycle Information Exchange:**

- The annual FCIX is scheduled for June, 2015 at the US Nuclear Regulatory Commission headquarters.

**Meeting Information:**

- June, 2015, Annual Fuel Cycle Information Exchange

**Contact:**  
 Maria Guardiola,  
[NMSS/FCSS/CDMOB](#),  
 301-287-9118  
 10/20/2014



# Standard Review Plan for License Applications for Fuel Cycle Facilities

## NUREG-1520, Revision 2

Soly I. Soto, Project Manager  
Division of Fuel Cycle Safety and Safeguards  
September 23, 2014



# Agenda



- ▶ Chapters Revised
- ▶ Major change to all chapters
- ▶ Discussion of the changes per chapter
- ▶ Address NEI's questions





# Chapters Revised

- ▶ Only the “Evaluation Findings” section of Chapters 8 and 10 was revised

Chapters	
Chapter 1, “General Information”	Chapter 6, “Chemical Safety”
Chapter 2, “Organization and Administration”	Chapter 7, “Fire Safety”
Chapter 3, “ISA and ISA Summary”	Chapter 9, “Environmental Protection”
Chapter 4, “Radiation Protection”	Chapter 11, “Management Measures”

# Major Change to All Chapters



- ▶ Section X.5, “Review Procedures” and Section X.6, “Evaluation Findings” were revised to include a more consistent standardized approach.
- ▶ Section X.6 revised to provide guidance on documentation of SERs.



# Introductory Sections

- ▶ Abstract: deleted text repeated in the introduction
- ▶ Executive Summary: deleted
- ▶ Glossary: NCS-specific terms added
- ▶ Introduction: administrative changes

# Chapters 1 & 2



## ▶ Chapter 1

- 1.2.3 Areas of Review
  - Protection of Safeguard Information— The application should describe how safeguards information will be protected against unauthorized disclosure.
- 1.2.4.3.6 Protection of Safeguards and Classified Information
- 1.2.4.3.7 Information Security at Uranium Enrichment Facilities

## ▶ Chapter 2

- Section 2.5 and Section 2.6

# Chapter 3



- ▶ Section 3.1 Purpose of Review
  - Redundant text or text not relevant to the section text was deleted
  - Several original text are now footnotes
  - Purpose of review of:
    - License Application and Safety Program
    - ISA Summary review
    - Vertical Slice Review

# Chapter 3 (cont.)



- ▶ Section 3.3 Areas of Review
  - Reorganization of guidance
    - 3.3.1 License Application and Safety Program
      - Specific areas of review for new license applications or license renewal
      - Specific areas of review for license amendment
    - 3.3.2 Integrated Safety Analysis Summary
      - Existing guidance was relocated into this subsection



# Chapter 3 (cont.)



- ▶ Section 3.4 Acceptance Criteria
  - Removed redundant text
  - Reorganized to follow the format of Section 3.3
    - 3.3.1 License Application and Safety Program
      - New guidance under “(3) Management Measures”
    - 3.3.2 Integrated Safety Analysis Summary
      - Minimum administrative changes overall
      - Existing acceptance criteria remains the same
      - The acceptance criteria for the definitions of “Unlikely,” “Highly Unlikely,” and “Credible” remain the same



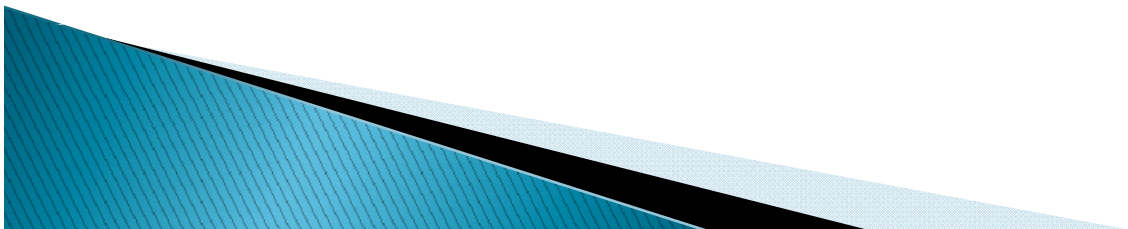
# Chapter 3 (cont.)

- ▶ Section 3.5 and Section 3.6 similar standardized text like the other chapters
- ▶ Appendices A–D were not revised

# Chapter 4



- ▶ Mostly administrative changes
- ▶ Section 4.5 and Section 4.6 similar standardized text like the other chapters



# Chapter 5



- ▶ NCS-specific terms added to glossary
- ▶ Inclusion of ISG-10 on subcritical margin as an appendix (new Appendix B)
- ▶ Example NCS evaluation added as an appendix (new Appendix C)
- ▶ Added criteria for acceptance reviews, new applications, and license amendments
- ▶ Added guidance for reviewing emergency plans
- ▶ Section 5.5 and Section 5.6 similar standardized text like the other chapters

# Chapter 6



- ▶ Administrative changes
- ▶ Relocation of guidance to more appropriate section

# Chapter 7



- ▶ 7.4.3.2.1 Development of a Fire Hazard Analysis as a Tool for Evaluating Fire Hazards
  - New paragraph added to include additional guidance on fire hazard analysis



# Chapter 8



- ▶ Was not part of the scope of this revision
- ▶ Section 8.5 and 8.6 similar standardized text like the other chapters
- ▶ Revision of this chapter will be considered in the future



# Chapter 9

- ▶ Revised to clarify that although the information regarding environmental monitoring may be used by the staff as part of a larger set of information considered in the preparation of an EIS, this SRP chapter is not intended to satisfy the independent information needs to prepare an EIS or EA under the separate requirements of NEPA.
- ▶ Needs to be revised to remove Office of Federal and State Materials and Environmental Management Programs
- ▶ Section 8.5 and 8.6 similar standardized text like the other chapters

# Chapter 11



New guidance added to describe use of graded management measures

Management Measure	Graded	Not Graded
Configuration Management		X
Maintenance	X	
Training and Qualification	X	
Procedures	X	
Audits and Assessments	X	
Incident Investigations	X	
Records Management	X	
Other Quality Assurance Elements	X	X



# Chapter 11

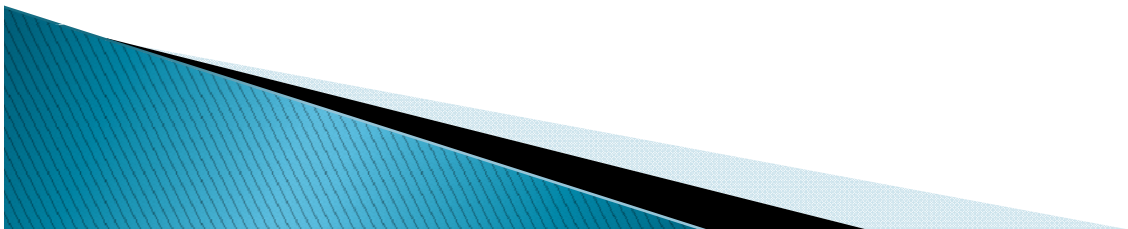
## Other Quality Assurance Elements

Graded	Not Graded
QA Program	Organization
Control of Purchased Material, Equipment, and Services	Document Control
Inspection	Identification and Control of Items
Corrective Action	Control of Special Processes
Audits	Test Control
Design Control	Handling, Storage, and Shipping
Procurement Document Control	Inspection, Test, and Operating Status
Instructions, Procedures, and Drawings	Control of Nonconforming Items
Control of Measuring and Test Equipment	
QA Records	

# Chapter 12



- ▶ New Chapter!
- ▶ The new chapter 12 will address the requirements for material control and accounting described in 70.22(b)



# Chapter 13



- ▶ New Chapter!
- ▶ Chapter 13 will address the requirements for physical protection described in 70.22(g), (h), (j), and (k)



# Next Steps



**COMMENT PERIOD ENDS**

November 3, 2014



**RESOLUTION OF PUBLIC COMMENTS**

Fall 2014



**PUBLICATION OF THE FINAL SRP**

Fall 2015



# References

- ▶ 79 FR 32579 dated June 5, 2014
- ▶ Draft is available in the NRC Electronic Reading Room <http://www.nrc.gov/public-involve/doc-comment.html#nuregs>
- ▶ Redline version of the draft SRP is publically available in ADAMS at the following accession number: ML14153A580
- ▶ FCIX Presentation: ML14170A159



**U.S.NRC**

UNITED STATES NUCLEAR REGULATORY COMMISSION

*Protecting People and the Environment*

---

**IP 88161:  
Corrective Action Program (CAP)  
Implementation at Fuel Cycle Facilities**

**September 23, 2014**

Sabrina Atack/Jonathan DeJesus  
U.S. Nuclear Regulatory Commission

# Fuel Facility Corrective Action Programs

- NRC Enforcement Policy (ADAMS Accession No. ML13228A199) allows the use of non-cited violations for both NRC-identified and licensee-identified severity level IV violations if the licensee has an adequate CAP and certain conditions are met
- RG 3.75, “Corrective Action Programs for Fuel Cycle Facilities” issued in July 2014 (ADAMS Accession No. ML14139A321)

# CAP Adequacy

CAP  
Acceptability

- Licensee commitment to RG 3.75 and subsequent issuance of license condition, or
- Submittal of licensee CAP description, technical review of CAP submittal, and issuance of CAP approval with license condition and safety evaluation report

CAP Effectiveness

- Inspection of CAP implementation (IP 88161)
  - Done subsequent to receipt of letter from licensee identifying that it is ready for inspection

---

CAP is adequate

- SL IV violations may be dispositioned as non-cited violations if the Enforcement Policy provisions are met

# IP 88161

- Two purposes:
  - Verify that CAP policies, procedures, and implementing documents are consistent with license commitment (Section C of RG 3.75 or licensee CAP description)
  - Verify that CAP is effective
- Inspection Implementation
  - Sufficient time will be spent on initial inspection to assess program documents
  - After initial inspection, evaluation of program documents will be focused on policies and procedures that have been revised since last inspection
  - Both initial and subsequent inspections will assess program effectiveness

## **IP 88161: Organization**

- Verify that the licensee has a CAP organization that includes an Independent Reviewing Organization (IRO)
- IRO must be auditable and independent of production organization
  - IRO duties may be assigned to existing part of licensee organization or a consultant, provided that appropriate justification is provided
- IRO must be provided appropriate authority, access to work areas and organizational independence to effectively perform its responsibilities





**U.S.NRC**

United States Nuclear Regulatory Commission

*Protecting People and the Environment*

## **IP 88161: Policies, Programs, and Procedures**

- **Assess CAP policies and procedures**
  - Should include definitions of key terms, CAP expectations, CAP requirements, personnel responsibilities and implementation processes.
  - Must provide sufficient guidance to ensure the licensee's implementation of RG 3.75 elements
  - Need to describe the management of sensitive information (if that information will be managed outside the CAP database)
- The IRO is required to review and document concurrence with new and revised CAP policies and procedures
- If any CAP responsibilities are delegated to other individuals or organizations, the delegation must be documented



## **IP 88161: Identification, Reporting, and Documentation of Safety and Security Issues**

- Verify that employees are trained on how to identify conditions adverse to safety and security and enter them in the CAP
- Employees are comfortable with the avenues available to raise safety concerns
  - Positive safety culture
- Conditions adverse to safety or security are entered into the CAP
  - The licensee documents conditions adverse to safety and security in the CAP
    - Includes an assessment of data sources such as failure logs and NRC reportable events to ensure appropriate inclusion in CAP

## **IP 88161: Significance Assessment and Causal Evaluation of Safety and Security Issues**

- Verify that criteria for determining the significance of conditions adverse to safety or security were implemented
  - Significance of conditions entered in the CAP is appropriately classified
- For significant conditions adverse to nuclear safety or security, inspection will verify that the licensee determines the root cause, evaluates the extent of condition, and takes actions to prevent recurrence

## **IP 88161: Development and Implementation of Corrective Actions**

- Verify that the licensee promptly initiates corrective actions when conditions adverse to safety or security are identified
  - Timeliness of action is commensurate with significance of issue
  - Impact to other work in progress was assessed (including need to stop work)
- The licensee uses a graded approach to verify implementation and close out of corrective actions in a time frame consistent with the safety or security significance of the identified issue
  - Corrective actions adequately address the causes and were performed by qualified personnel using approved methods
- The IRO performs appropriate verifications of corrective actions to ensure CAP effectiveness
  - Reviews the corrective actions for significant conditions
  - Evaluates implementation of corrective actions as appropriate
- Trends and adverse conditions are reported to the appropriate level(s) of management

## **IP 88161: Assessment of Corrective Action and Program Effectiveness**

- Verify that the licensee is evaluating the effectiveness of the CAP at specified intervals
  - Periodic audits or self-assessments of the corrective action program performed and documented
    - Include elements such as the identification, reporting, assessment of condition significance, and correction of conditions
- Conditions adverse to safety or security are analyzed to identify adverse trends in performance

## Example of an Adequate CAP

- Procedures are established that address the six elements RG 3.75 in sufficient detail to ensure effective, consistent implementation
- A CAP organization is developed that includes an independent reviewing organization
- Personnel receive CAP training and are comfortable raising safety and security concerns
- Conditions adverse to safety and security are identified, documented, assessed for significance, reported to appropriate levels of management, and corrected
  - For significant conditions, the impact to work in progress is considered, the root cause is identified, and actions are taken to preclude recurrence
- Routine trending is performed to identify repetitive conditions
- An assessment process is implemented to periodically verify the effectiveness of the CAP.

# Examples of Inadequate CAP

- No process for periodic audit and assessment of program effectiveness
- Multiple conditions (e.g., equipment failures, reportable events, inventory differences) not entered into CAP
- Repeated, improper classification of condition significance leading to inadequate rigor in evaluating cause and precluding repetition
- Failure to include security issues in CAP (does not apply to provision for managing sensitive information outside CAP database)
- Staff not receiving training on CAP or not feeling comfortable raising safety/security concerns



# Lessons Learned

- Inclusiveness of term “safety and security”
  - The CAP must address not just conditions adverse to safety, such as issues with IROFS, but also security
  - Security includes material control and accounting, physical security (e.g., controlled areas of the facility), information security, and cyber security



**Draft Generic Letter: Treatment of Natural Phenomena Hazards at  
Fuel Cycle Facilities**

**September 23, 2014**

# Agenda

- Background
- Generic Letter
- Key Messages

***All comments that are to receive consideration in the final generic letter must still be submitted electronically or in writing as indicated by Federal Register Notice.***

# Background

- Japan Earthquake and Tsunami
  - Fukushima Daiichi event
- Temporary Instruction (TI) 2600/015
  - Unresolved Items
- Draft Generic Letter

# Draft Generic Letter

- Purpose:
  - Request for information to verify compliance with regulations regarding natural phenomena hazards effects (e.g. earthquake, high winds)
- Outcome:
  - Verify the basis and documentation of how the facility provides for the adequate protection of the public health and safety under natural phenomena hazard (NPH) events

## Draft Generic Letter (Cont.)

- Information collection (90 days)
  - Definitions of “unlikely,” “highly unlikely,” and “credible” for NPH events
  - Integrated Safety Analysis
    - Likelihood & Magnitude
    - Accident sequences
    - Consequences (performance requirements)
    - Items Relied on for Safety
  - Description of changes to hazards applicable to site with facility design basis
  - Summary of the results of any walk downs (e.g. evaluation of degraded conditions)

## Draft Generic Letter (Cont.)

- Additional information (180 days)
  - If a need to change the facility safety assessment is identified
    - Evaluation basis event used (magnitude & likelihood)
    - Safety margin evaluation and/or mitigation strategies
    - If applicable, submit proposed modifications



## Draft Generic Letter (Cont.)

- Draft Generic Letter documents
  - ADAMS Accession Number: [ML13157A158](#)
  - <http://www.regulations.gov/#!docketDetail;D=NRC-2014-0187>
  - Comment period closes November 06, 2014

# Generic Letter Closure Process

- Review Process
  - Submittal of responses
  - Staff review of responses
    - Request for additional information (if needed)
    - Site visits (if needed)
  - Letter to document closure of generic letter review process
  - Inspections to close previously identified Unresolved Items

# Key Messages

- Systematic evaluation of fuel cycle facilities identified potential generic issues regarding compliance with current regulatory framework for natural phenomena hazards (NPH).
- Staff is developing a Generic Letter to collect information from fuel cycle facilities.
- Validation of assumptions of how the facility provides adequate protection under NPH events.



**Questions?**