

Fuel Facility Stakeholders Meeting

May 18, 2022

Public Meeting With Nuclear Energy Institute
and Members from the Nuclear Fuel Facility Industry

Jonathan Rowley, Project Manager

Division of Fuel Management

Office of Nuclear Material Safety and Safeguards

Email: Jonathan.Rowley@nrc.gov

Phone: 301-415-4053

Meeting Category and Public Participation

This is an Observation Meeting. This is a meeting in which attendees will have an opportunity to observe the NRC performing its regulatory function or discussing regulatory issues. Attendees will have an opportunity to ask questions of the NRC staff or make comments about the issues discussed following the business portion of the meeting; however, the NRC is not actively soliciting comments towards regulatory decisions at this meeting.

Agenda – May 18, 2022

| Topic | Time | Presenter |
|---|----------|--|
| Introduction (Purpose/Rules) | 9:30 AM | Jonathan Rowley, Project Manager, DFM |
| Opening Remarks | 9:35 AM | Shana Helton, Director Division of Fuel Management Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission Janet Schlueter Nuclear Energy Institute (NEI) |
| Part 170 and 171 Fee Rule | 9:40 AM | Jennifer Tobin, Project Manager, DFM |
| Non-Fee Billable Work Expenditures | 10:00 AM | Matt Bartlett, Senior Project Manager, DFM |
| Fuel Facility Licensing Issues | 10:20 AM | Osiris Siurano, Project Manager, DFM Matt Bartlett, Senior Project Manager, DFM |
| Controlled Unclassified Information Implementation Status | 10:50 AM | Tanya Mensah, Project Manager, OCIO |
| Break | 11:10 AM | |
| Material Control and Accounting Guidance for Category II Facilities | 11:20 AM | Suzanne Ani, DFM |
| Inclusion of Part 70 In Electrical Regulatory Guides | 11:40 AM | Sheila Ray, NRR |
| Public Q&A | 12:10 PM | |
| Recap of Action Items | 12:20 PM | Jonathan Rowley, Project Manager, DFM |
| Closing Remarks and Adjourn | 12:25 PM | Shana Helton, Director Division of Fuel Management Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission Janet Schlueter Nuclear Energy Institute (NEI) |

Opening Remarks

Shana Helton, Director

Division of Fuel Management

Office of Nuclear Material Safety and Safeguards

Janet Schlueter, Senior Director

Fuel and Radiation Safety

Nuclear Energy Institute

Fiscal Year 2022 Fee Rule

Jenny Tobin, Project Manager

Fuel Facilities Licensing Branch

Division of Fuel Management

KEY MESSAGES

- FY22 proposed fee rule published February 23, 2022, for public comment (public meeting held March 17, 2022).
- No comments related to fuel facilities
- FY22 final rule to be published by June 30th (effective 60 days afterward).
- Majority of fuel facilities fees from 5 licensees (Centrus, BWXT, LES, NFS, and Westinghouse)
- Increase in hourly rate (\$288 to \$291)
- Fees have gone down slightly for fuel cycle facilities

Part 170/171 Fees

- Part 170: Estimated Billing increase as a result of the review of a new fuel facility license application, including the environmental review, for TRISO–X and the staff’s continued review of the Westinghouse Electric Company, LLC license renewal application
- Part 171: Annual fee decrease due to efficiencies gained as a result of implemented enhancements to the licensing program and enhancements made to the fuel facility oversight program through the implementation of the smarter inspection program

Effort Factors for Fuel Facilities

TABLE IX—EFFORT FACTORS FOR FUEL FACILITIES, FY 2022

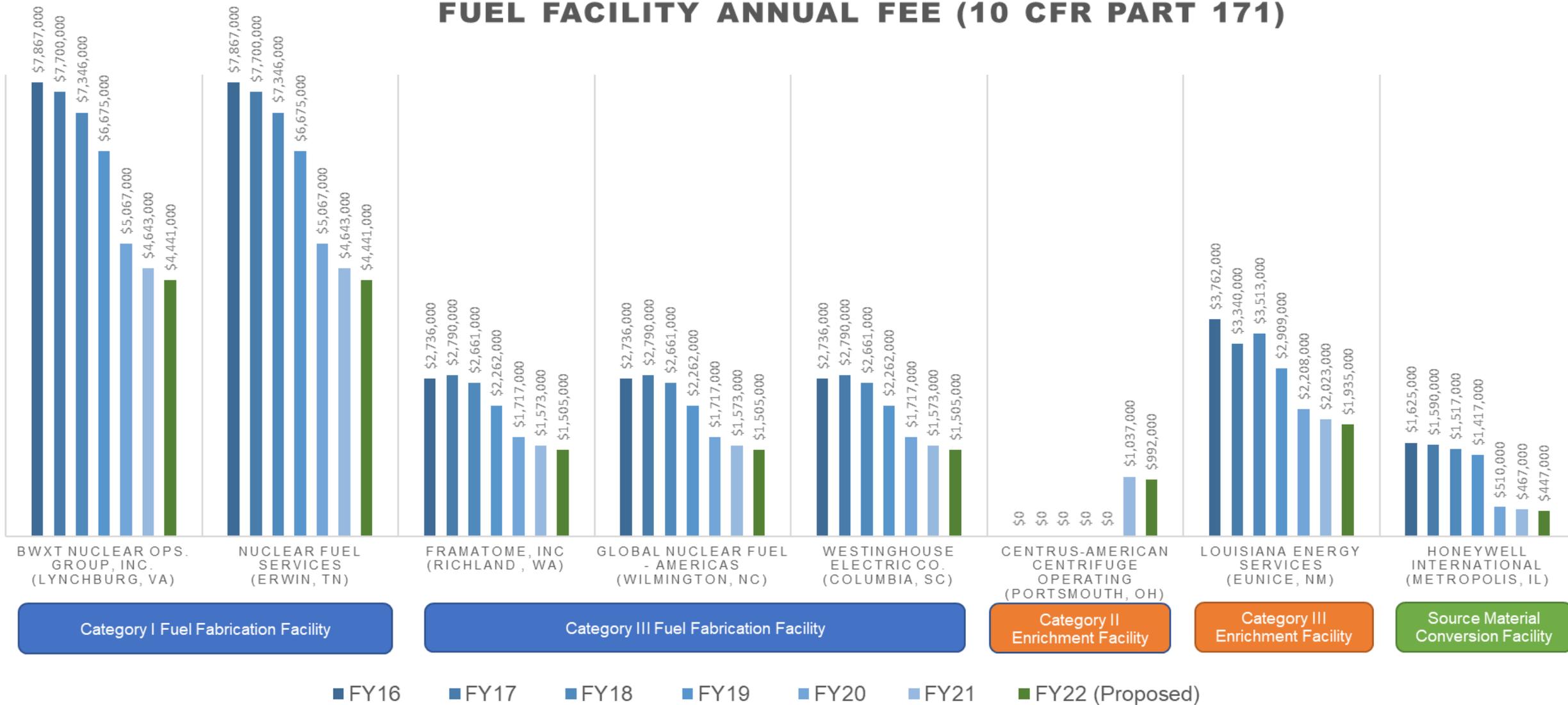
| Facility type (fee category) | Number of facilities | Effort factors | |
|---|-------------------------|----------------|------------|
| | | Safety | Safeguards |
| High-Enriched Uranium Fuel (1.A.(1)(a)) | 2 | 88 | 91 |
| Low-Enriched Uranium Fuel (1.A.(1)(b)) | 3 | 70 | 21 |
| Limited Operations (1.A.(2)(a)) | 1 | 3 | 17 |
| Gas Centrifuge Enrichment Demonstration (1.A.(2)(b)) | 0 | 0 | 0 |
| Hot Cell (and others) (1.A.(2)(c)) | 0 | 0 | 0 |
| Uranium Enrichment (1.E.) | 1 | 16 | 23 |
| UF ₆ Conversion and Deconversion (2.A.(1)) | 1 | 7 | 2 |

Annual Fees (Part 171)

TABLE X—ANNUAL FEES FOR FUEL FACILITIES
[Actual dollars]

| Facility type (fee category) | FY 2021 final annual fee | FY 2022 proposed annual fee |
|---|--------------------------------|-----------------------------------|
| High-Enriched Uranium Fuel (1.A.(1)(a)) | \$4,643,000 | \$4,441,000 |
| Low-Enriched Uranium Fuel (1.A.(1)(b)) | 1,573,000 | 1,505,000 |
| Facilities with limited operations (1.A.(2)(a)) | 1,037,000 | 992,000 |
| Gas Centrifuge Enrichment Demonstration (1.A.(2)(b)) | N/A | N/A |
| Hot Cell (and others) (1.A.(2)(c)) | N/A | N/A |
| Uranium Enrichment (1.E.) | 2,023,000 | 1,935,000 |
| UF ₆ Conversion and Deconversion (2.A.(1)) | 467,000 | 447,000 |

FUEL FACILITY ANNUAL FEE (10 CFR PART 171)



Current and Future Non-fee Billable Activities

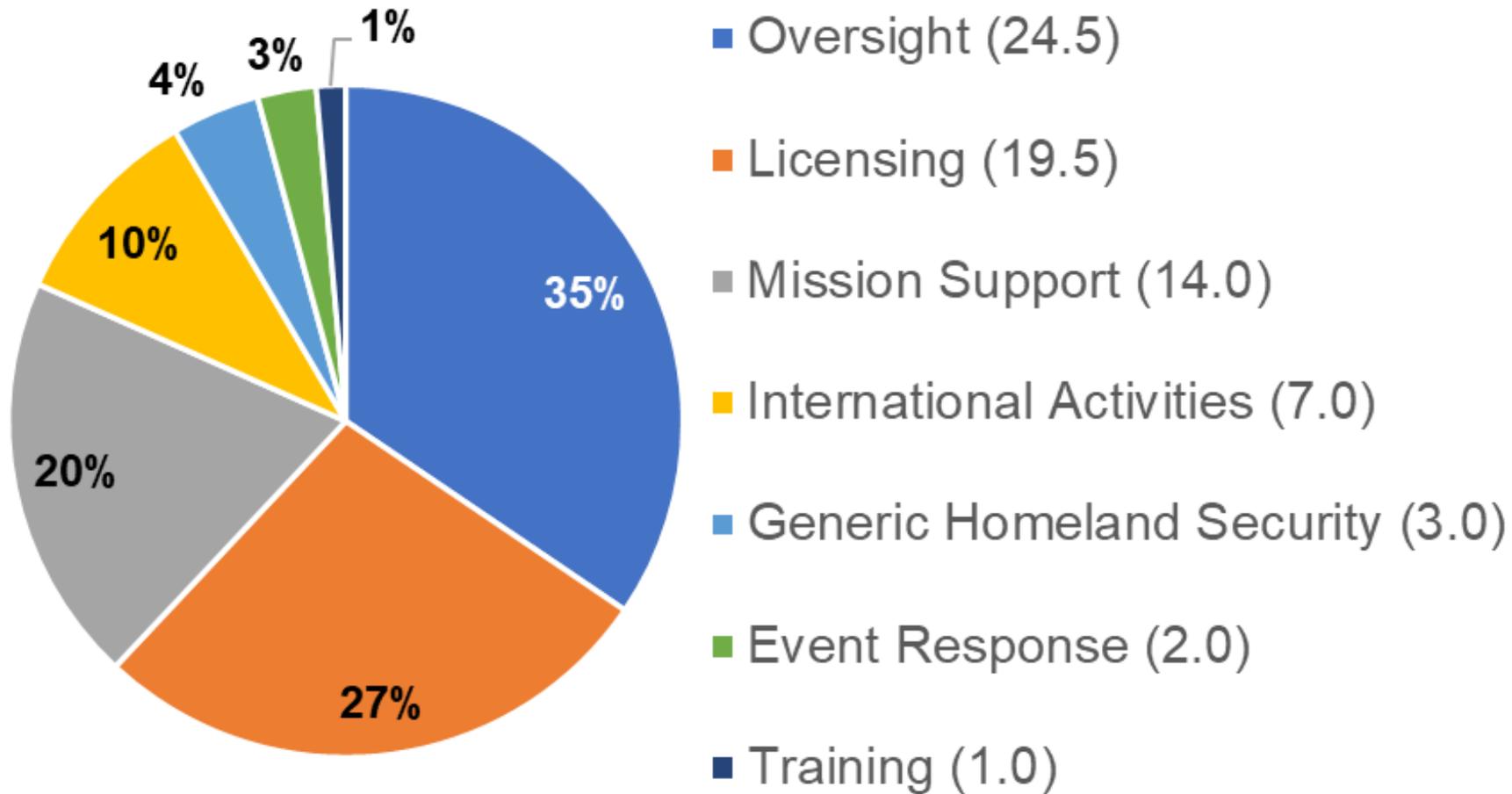
Matthew Bartlett, Project Manager
Fuel Facility Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards

Budget vs. Utilization (October – March 2022)

| Product Line | Total Budget (FTE) | Non-Billable (FTE) | Billable (FTE) |
|---------------------------|--------------------|--------------------|----------------|
| Event Response | 2.0 | 0.7 | 0.0 |
| Generic Homeland Security | 3.0 | 1.4 | 0.0 |
| International Activities | 7.0 | 3.2 | 0.0 |
| Licensing | 19.5 | 6.4 | 4.4 |
| Oversight | 24.5 | 8.7 | 4.4 |
| Rulemaking | 0 | 1.2 | 0.0 |
| Mission Support | 14.0 | 8.8 | 0.0 |
| Training | 1.0 | 0.6 | 0.0 |
| TOTAL | 71.0 | 31.0 | 8.8 |

FY2022 Budget

Business Line 38 - FY22 Budgeted Items (FTE)



Budget vs. Utilization (October – March 2022)

| Product Line 1 - Event Response | Annual | Utilized | |
|--|---------------|--------------------|----------------|
| Description | Budget (FTE) | Non-Billable (FTE) | Billable (FTE) |
| NB-FF-Event Response-Response Operations | 2.0 | 0.7 | 0 |
| Response Operations Total | 2.0 | 1.3 | 0 |

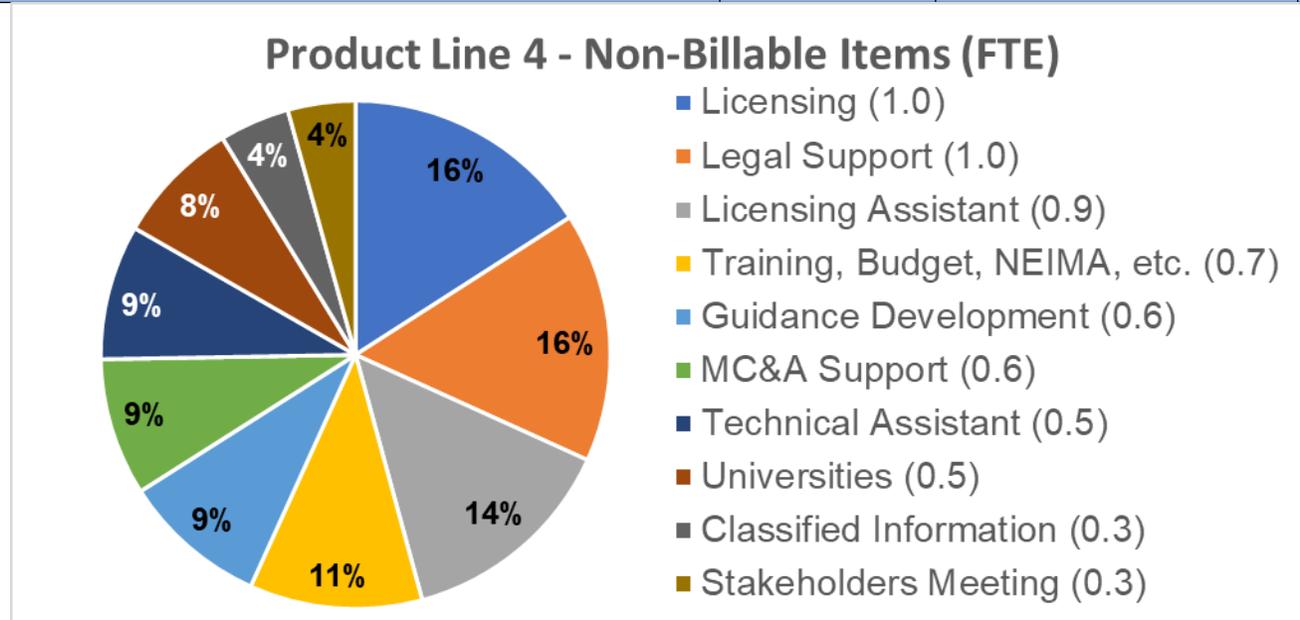
| Product Line 2 - Generic Homeland Security | Annual | Utilized | |
|---|---------------|--------------------|----------------|
| Description | Budget (FTE) | Non-Billable (FTE) | Billable (FTE) |
| Security Infrastructure | 3 | 1.4 | 0 |
| Response Operations Total | 3.0 | 1.4 | 0 |

Budget vs. Utilization (October – March 2022)

| Product Line 3 - International Activities | Annual | Utilized | |
|--|---------------------|---------------------------|-----------------------|
| Description | Budget (FTE) | Non-Billable (FTE) | Billable (FTE) |
| Conventions & Treaties | 4.0 | 1.8 | 0 |
| Licensing Export/Import | 1.0 | 0.5 | |
| International Technical Cooperation | 2.0 | 0.9 | |
| Response Operations Total | 7.0 | 3.2 | 0 |

Budget vs. Utilization (October – March 2022)

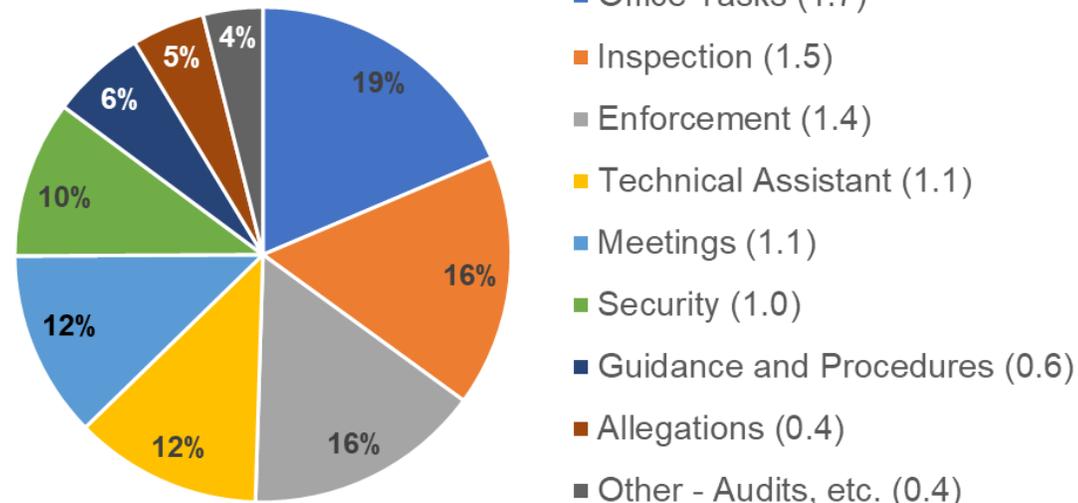
| Product Line 4 – Licensing Actions | Annual | Utilized | |
|------------------------------------|--------------|--------------------|----------------|
| Description | Budget (FTE) | Non-Billable (FTE) | Billable (FTE) |
| Licensing Action (Fee Recoverable) | 16 | 5.4 | 4.1 |
| Policy Advice and Outreach | 1 | 0.1 | 0.0 |
| Security | 2 | 0.9 | 0.3 |
| Response Operations Total | 19 | 6.4 | 4.4 |



Budget vs. Utilization (October – March 2022)

| Product Line 5 - Oversight | | Utilized | |
|----------------------------------|--------------|--------------------|----------------|
| Description | Budget (FTE) | Non-Billable (FTE) | Billable (FTE) |
| Allegations and Investigations | 1.0 | 0.4 | 0 |
| Enforcement | 3.0 | 1.4 | 0 |
| Inspection | 18.0 | 6.1 | 3.7 |
| Security | 4.0 | 1.3 | 0.7 |
| Response Operations Total | 26 | 9.2 | 4.4 |

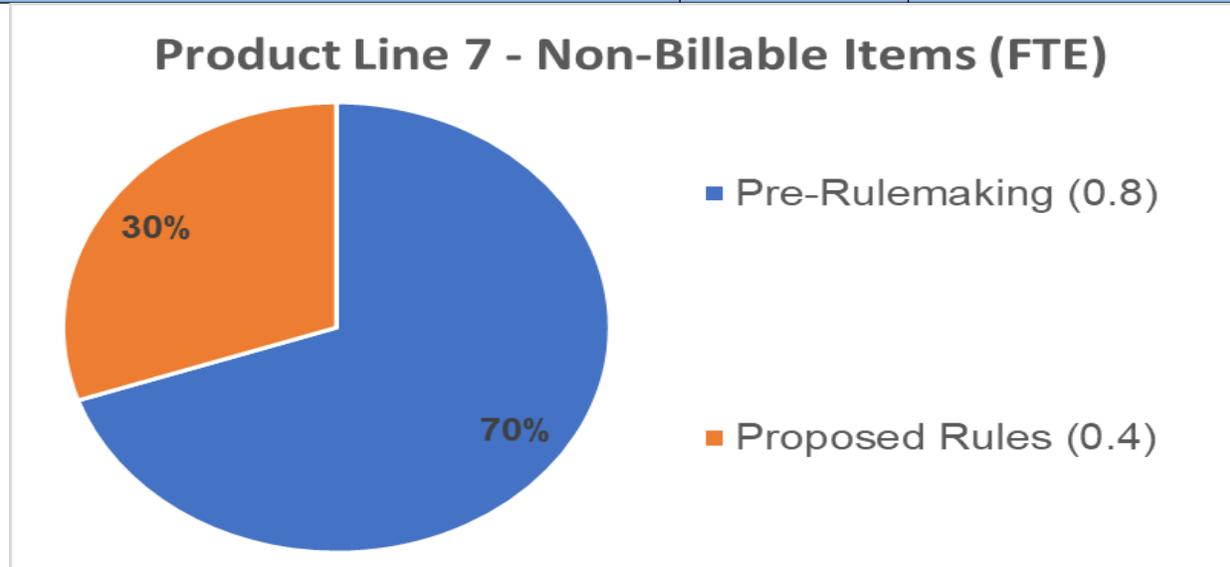
Product Line 5 - Non-Billable Items (FTE)



Budget vs. Utilization (October – March 2022)

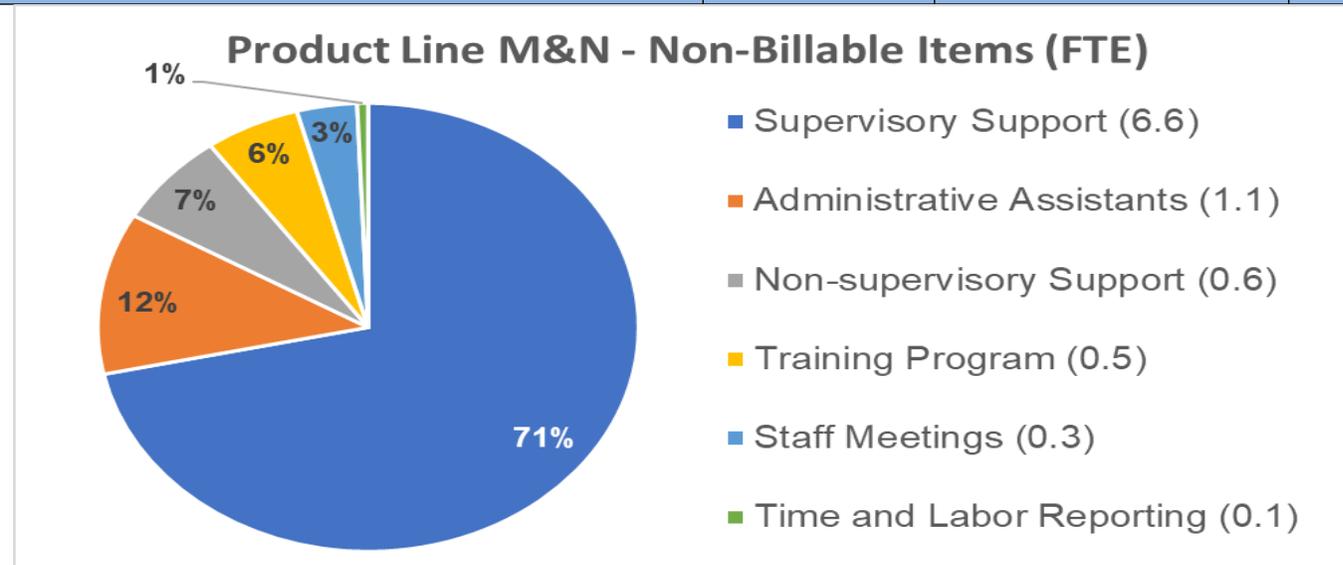
Product Line 7 – Rulemaking (Non-billable)

| Product Line 1 - Event Response | Annual | Utilized | |
|----------------------------------|--------------|--------------------|----------------|
| Description | Budget (FTE) | Non-Billable (FTE) | Billable (FTE) |
| Rulemaking | 0 | 1.2 | 0 |
| Response Operations Total | 0 | 1.2 | |



Budget vs. Utilization (October – March 2022)

| Product Line M & N – Training/Mission Support and Supervisors | Annual | Utilized | |
|---|--------------|--------------------|----------------|
| Description | Budget (FTE) | Non-Billable (FTE) | Billable (FTE) |
| Non-Supervisory Resources | 2 | 1 | 0 |
| Entry-Level Hiring | 1 | 0.5 | |
| Supervisory Staff | 10 | 6.6 | |
| Administrative Assistants | 2 | 1.1 | |
| Response Operations Total | 0 | 1.2 | 0 |



Future Non-Billable Work in the Fuel Facilities Business Line

FY 2022-2023

- Commission meetings and drop-in meetings
- Guidance Updates and Assessment
 - Advanced Reactors
 - Accident Tolerant Fuel
 - NUREG-1748 - Environmental Review
 - NUREG-2212 - New Applications For Greater Than Critical Mass
 - Authorizing Official and Classified Networks
 - Staff Training and Qualifications
- Renew existing license for 2 fee-exempt universities
- Operating Experience Review
- Rulemaking Activities
 - Annual Fee Rule
 - Cyber Security

Current and Future Non-fee Billable Activities

QUESTIONS/COMMENTS

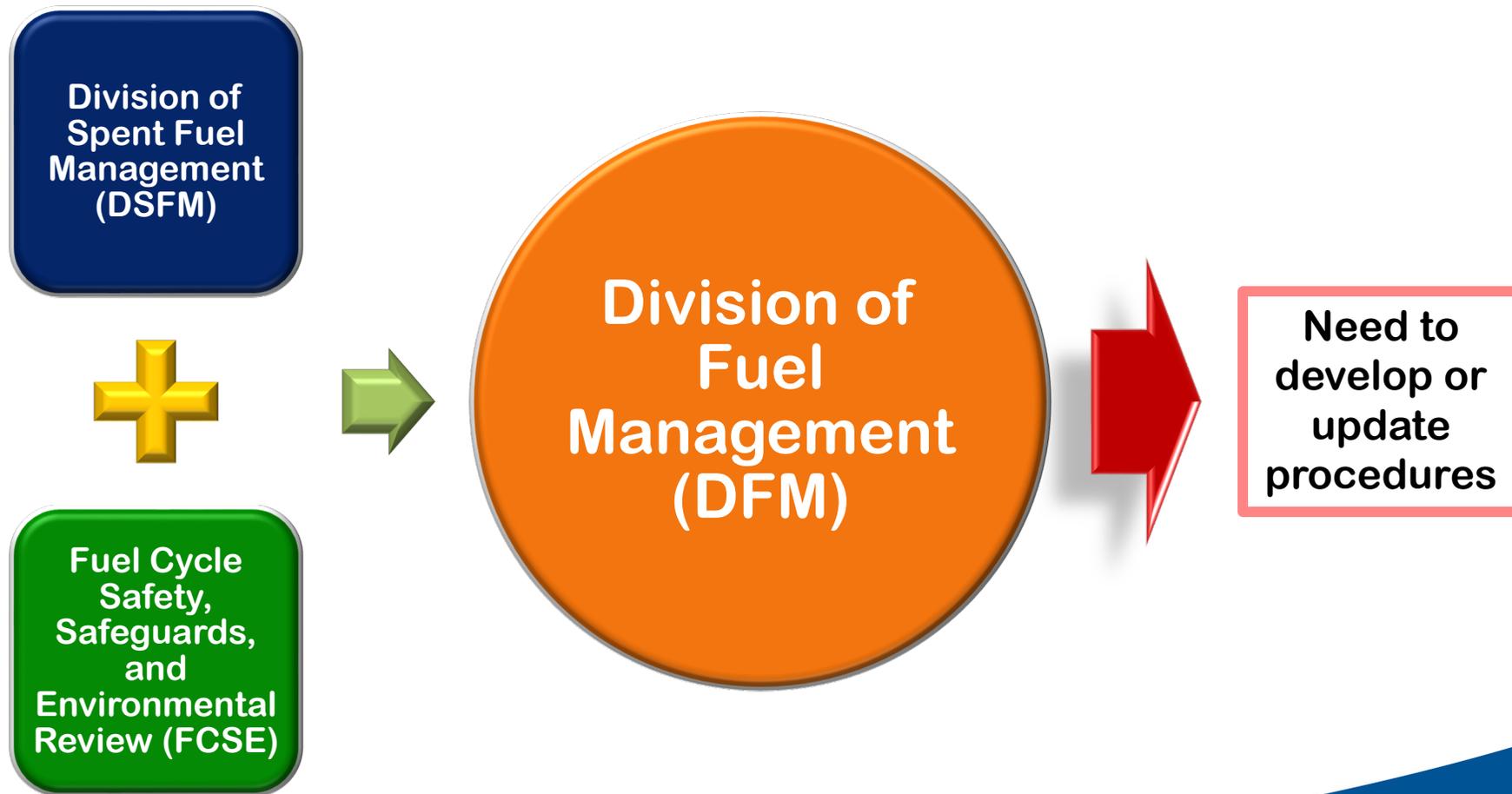
Division of Fuel Management Instructions Development, Status, and Next Steps

Osiris Siurano-Pérez

Project Manager

Fuel Facility Licensing Branch

Division Instructions Development/Update



Division Instructions Development/Update

- Guidance and recommendations considered and incorporated
 - Fuel Cycle Safety, Safeguards, and Environmental Review Licensing Handbook
 - Spent Fuel Storage and Transportation Division Instructions (DIs)
 - Smarter Licensing Working Group Recommendations
 - Management Expectations on Licensing and Certification Process
 - General Accounting Office Report (GAO-20-362) Recommendations
 - Inspector General Report (OIG-21-A-08) Recommendations

Division Instructions Development/Update

- Four DIs prioritized
 - LIC-FM-1, “Overview and Expectations of the Certification and Licensing Process”
 - LIC-FM-2, “Acceptance Review Process”
 - LIC-FM-3, “Requests for Additional Information”
 - LIC-FM-4, “Safety Evaluation Reports”

Division Instructions Development/Update

- Sample changes to current procedures
 - LIC-FM-1, “Overview and Expectations of the Certification and Licensing Process” (new/updated guidance)
 - Consider conducting pre-application meetings and/or audits to better understand administrative and technical aspects of application

Division Instructions Development/Update

- Sample changes to current procedures (continued)
 - LIC-FM-2, “Acceptance Review Process”
new/updated guidance
 - Consider conducting additional meetings during the acceptance review to better understand administrative and technical aspects of application
 - Issuance of observations in acceptance letter
 - May become RAIs or may go away during the detailed technical review

Division Instructions Development/Update

- Sample changes to current procedures (continued)
 - LIC-FM-3, “Requests for Additional Information”
 - Discuss and ensure consistent structure and clarity of RAIs (includes incorporation and use of job aids):
 - Justification
 - Regulatory requirement
 - Information needed

Division Instructions Development/Update

- Sample changes to current procedures (continued)
 - LIC-FM-4, “Safety Evaluation Reports”
 - Use of job aids and templates for drafting SERs
 - Facilitate inspector involvement early in the licensing review process, where and when appropriate

Division Instructions Status

- Prioritized DIs issued internally for staff use
 - One additional DI completed and publicly available
 - FF-FM-2, “Implementation of the US & IAEA Safeguards Agreement”
 - Effective date: March 2021 (ML20353A353)
- Staff training on prioritized DIs completed
- Receiving feedback/input/comments from DFM staff

Division Instructions

Next Steps

- Revise/Incorporate staff input
- Release DIs to public
 - LIC-FM-1
 - To be released by end of May 2022
 - LIC-FM 2, and LIC-FM 3
 - To be released by end of Summer 2022
 - LIC-FM-4
 - To be released by September 2022

Division Instructions

Development, Status, and Next Steps

QUESTIONS/COMMENTS

Smarter Licensing Program

Matthew Bartlett, Project Manager
Fuel Facility Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety and
Safeguards

Smarter Licensing Program

Background:

1. 2019, see Charter - April 26, 2019, ([ML19115A016](#))
2. Near-Term, Mid-Term and Long-Term Recommendations - April 30, 2020 ([ML20099F354](#))
3. Action Plan - July 10, 2020 ([ML20184A267](#))

Smarter Licensing Program

Items completed since October 2021

1. Incorporated the Smarter License Recommendations (SLRs) in the DIs.
2. Incorporated a cross-walk for the SLRs in each DI appendix
3. Published a quarterly update on the public website at: <https://www.nrc.gov/materials/fuel-cycle-fac/regs-guides-comm.html#building>.

Smarter Licensing Program

Each of the 4 DIs contain an appendix stating the SLRs addressed and their location within the DI

| LIC-FM-2 Appendix C. Smarter Licensing Recommendations in this Division Instruction | | |
|---|--|---|
| SLR No. | Summary of Recommendation | Section(s) |
| NT1-1 | Establish schedule and date of completion of technical review with input from licensee. | 2.3.4 2.3.7 2.3.9 2.3.10 2.11.1(e)(2) |
| NT1-2 | Share with the licensee metrics and estimated hours needed for completing the technical review. | 2.3.9 2.3.10 2.11.1(e)(2) |
| NT1-6a | Coordinate and share with the applicant the review milestones/schedule including milestones for actions/areas to be completed by supporting organizations (e.g., OGC, external contributors, centers of excellence). | 2.3.9 2.3.10 2.11.1(e)(2) |
| NT1-29 | Improve and incorporate into review guidance early alignment between the NRC staff and the applicant on the scope and content of the submittals/review. | 2.3.5 2.3.9 |
| NT2-4 | Consider holding meetings with the applicant prior to submitting the application or during the acceptance review to better understand unique aspects of the application and technical review. | 2.3.6 2.7.3 (introduction) 2.7.3(a) |

SLR Number

SLR Description

DI Sections

Smarter Licensing Program

Examples of SLRs included:

NT1-1 and 1-2 Provide estimated schedule and hours

LIC-FM-02 (2.3.10) – Incorporated in acceptance letters

NT3-5 Use flexible review metrics

LIC-FM-02 (2.7.1) – Combine acceptance with approval

NT4-12 Ensures a complete set of RAIs

LIC-FM-04 (2.1.4.2) - Develop a draft SER with the RAIs

Smarter Licensing Program

Status on Next Steps

1. Incorporate staff comments/input
2. Publish DIs starting May 2022
 - a. Continue to provide quarterly updates on public website:
<https://www.nrc.gov/materials/fuel-cycle-fac/regs-guides-comm.html#building>

Smarter Licensing Program

QUESTIONS/COMMENTS

Controlled Unclassified Information (CUI) Implementation Status

Scott Flanders, Deputy Chief Information Officer
Tanya Mensah, CUI Program Manager

Office of the Chief Information Officer (OCIO)
US Nuclear Regulatory Commission (NRC)

Purpose

- To continue discussions with NRC stakeholders regarding the NRC's plans to implement a Controlled Unclassified Information (CUI) program.
- Discuss the NRC's approach to disseminate CUI to non-executive entities (i.e., licensees).

Agenda

- Key Messages
- NRC CUI Implementation Schedule
- CUI Information-Sharing Agreements
- NRC Path Forward To Disseminate CUI To Licensees

What Is CUI?

CUI is information that is not classified, but that Federal law, regulation, or governmentwide policy either requires or permits an agency to handle using safeguarding and dissemination controls.

The CUI Program:

1. Standardizes the way the Federal government handles information that is not classified or Restricted Data but requires protection.
2. Replaces more than one hundred different agency policies and associated markings with one shared policy (i.e., CUI) and standardized markings for Federal executive branch agencies.
3. Directly applies to executive branch agencies that designate or handle CUI, and indirectly applies through formal CUI written agreements or arrangements to non-executive branch recipients.

Key Messages

- The NRC plans to transition to CUI on September 20, 2022*.
- CUI will:
 - Replace the NRC’s current Sensitive Unclassified Non-Safeguards Information (SUNSI) Program.
 - Include Safeguard Information (SGI) and SGI-Modified Handling (SGI-M).
 - **10 CFR Part 73, “Physical Protection of Plants and Materials” requirements remain the same.**
- **All NRC employees and contractors continue to follow the existing NRC policy for Sensitive Unclassified Non-Safeguards Information (SUNSI), which remains in effect until CUI is implemented.**
- The NRC is committed to minimizing the impact of this transition for NRC internal and external stakeholders, to the extent practicable.

*Refer to the summary of the March 28, 2022, NRC CUI Public Meeting for more details (ADAMS Accession No: [ML22095A160](#))

Key NRC CUI Implementation Tasks

NRC CUI Policy Statement

- ✓ **Published the NRC's high-level CUI Policy Statement in the [Federal Register](#)** on November 12, 2021.

NRC CUI Implementing Policy & Guidance

- ✓ **Published MD 12.6, "NRC Controlled Unclassified Information Program"** on December 3, 2021.
- ✓ Available on the NRC's CUI Public Website:
<https://www.nrc.gov/reading-rm/cui.html>

NRC CUI Training

- Deploy mandatory CUI training** for NRC employees and contractors (Goal: June 1, 2022).

CUI Rulemaking (Administrative)

- Publish Final Rule** (Goal: August 2022)
 - This rulemaking consists of nomenclature changes proposed to existing regulations in 10 CFR Part 2, "Agency Rules of Practice and Procedure," to avoid potential confusion once the SUNSI program is discontinued.
 - Reference: [SECY-21-0105](#): Final Rule: Controlled Unclassified Information

CUI Written Agreements

- Establish CUI information-sharing agreements** with non-Executive entities (*In progress*)

CUI Information-Sharing Agreements (32 CFR 2002.16(a)(5))

- Agencies should enter into a formal information-sharing agreement, whenever feasible, when sharing CUI with a non-executive branch entity.
- When an agency cannot enter into formal agreements, but the agency's mission requires it to disseminate CUI to non-executive entities, the Government strongly encourages non-executive entities to protect CUI in accordance with the CUI Rule.
- CUI protections should also accompany the CUI if the non-executive entity disseminates it further.

NIST SP 800-171 Compliance

- The NARA CUI rule identifies National Institute of Standards and Technology (NIST) Special Publication (SP) 800-171* as containing the security requirements for protecting CUI's confidentiality on non-Federal information systems.**
- All agencies must prescribe, at a minimum, the requirements of NIST SP 800–171 when sharing electronic CUI with non-executive entities that are not operating an information system on behalf of the agency.
- NIST SP 800-171 applies to non-executive entities that intend to take possession (i.e., download, forward, and print) of CUI they receive from an agency.

* <https://csrc.nist.gov/publications/detail/sp/800-171/rev-2/final>

** NIST CUI Information Security Requirements Workshop: <https://www.nist.gov/news-events/events/2018/10/controlled-unclassified-information-security-requirements-workshop>

NRC Path Forward To Disseminate CUI To Non-Executive Entities

- Following the March 28, 2022, NRC CUI Public meeting, the Nuclear Energy Institute identified significant burden on licensees to comply with NIST SP 800-171. (ADAMS Accession No. [ML22110A178](#)).
 - On May 3, 2022, the NRC issued a response to further clarify its approach to minimize burden on licensees (ADAMS Accession No. [ML22110A175](#)).
- Path Forward:
 - NRC is developing a draft NRC CUI information-sharing agreement (ADAMS Accession No. [ML22081A315](#)).
 - An administrative Regulatory Issue Summary (RIS) is under development to formally inform all NRC external stakeholders before September 20, 2022, of the upcoming transition to CUI and to discuss the CUI information-sharing agreements that are forthcoming.
 - NRC is exploring a technical solution to securely share CUI by email with non-executive entities that do not want to take possession of CUI onto their non-Federal systems.
 - Licensees would not be able to download, forward, or print any CUI you receive from the NRC.
 - Additional public meetings will be needed to share the NRC's progress.
 - Licensees that take possession of CUI they receive from an agency will need to satisfy NIST SP 800-171.

NRC Approach To Verify Non-Executive Entity Compliance With NIST SP 800-171

- Licensees that do not intend to take possession of CUI onto their non-Federal system, do not have to satisfy NIST SP 800-171.
- Licensees that intend to take possession of CUI onto their non-Federal system, must:
 - Develop and maintain a system security plan (SSP) and plan of action (POAM) milestones to satisfy NIST SP 800-171.
 - Self-certify compliance to NIST SP 800-171. The NRC does not plan to:
 - Request that the SSP and POAM be submitted to the NRC for review.
 - Conduct inspections or audits of the licensee using NIST SP 800-171A.

How Can You Obtain Additional Information?

- NRC CUI Program Contact
 - Scott Flanders, OCIO Deputy Chief Information Officer
 - Jon Feibus, Acting NRC CUI Senior Agency Official
 - Tanya Mensah, NRC CUI Program Manager
 - Email: CUI@nrc.gov
- NARA CUI Website (<https://www.archives.gov/cui>)
 - CUI Registry
 - Policy & Guidance
 - Training (NARA CUI videos)
 - CUI Blog
 - CUI Program Update To Stakeholders Meeting
- NRC CUI Public Website: <https://www.nrc.gov/reading-rm/cui.html>



Guidance for Material Control and Accounting:

NUREG-2159, Revision 1

Acceptable Standard Format and Content for the Fundamental Nuclear Material Control Plan Required for Special Nuclear Material of Moderate Strategic Significance

Suzanne Ani

Material Control and Accounting Branch
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards

NUREG-2159, Revision 1

Final Draft

- Draft for Comment published in *Federal Register Notice* (86 FR 52926), on September 23
- Original 60-day public comment period extended for an additional 14 days, ending on December 3, 2021, per request from stakeholder (86 FR 61795, November 08, 2021).
- Four comment submissions, 17 comments total

NUREG-2159, Revision 1

Final Draft

- Final Draft has been revised to address comments
- Review for Congressional Review Act (CRA) currently in progress
- CRA review likely to take at least 3 months
- Issuance of final version of NUREG will be noticed in the *Federal Register*

QUESTIONS/COMMENTS

Inclusion of Fuel Facilities in Electrical Regulatory Guidance

Sheila Ray, P.E.

Senior Electrical Engineer

Electrical Engineering Branch

Division of Engineering and External Hazards

Office of Nuclear Reactor Regulation

Electrical Engineering Center of Expertise

- The Electrical Engineering Center of Expertise provides the agency's technical support for the review of operating reactors, new reactors, production and utilization facilities, and fuel facilities.
 - Onsite Power Systems
 - Offsite Power Systems
- The staff identified a potential area of improvement for the review of fuel facilities.

Electrical Regulatory Guidance

- Currently, the Electrical Regulatory Guidance is applicable to applicants and licensees subject to 10 CFR Part 50 and 52.
 - Nuclear Power Plants
 - Production and Utilization Facilities
- The consideration is for the Electrical Regulatory Guidance to be applicable to fuel facilities licensed under 10 CFR Part 70.
 - The staff approved the use of electrical standards (i.e., IEEE consensus standards) to satisfy the requirements for fuel facilities.
- Inclusion of 10 CFR Part 70 Facilities in Electrical Regulatory Guidance would be a case-by-case basis, since not all electrical components are in fuel facilities.
- Electrical Regulatory Guidance is one acceptable method to meet the regulations and do not constitute new requirements or expectations.
- This strategy is not creating or imposing requirements.
- Staff continues to seek a reasonable assurance of safety, compliance with the relevant regulations, and conformance to applicable guidance.

Benefits of Inclusion of Fuel Facilities

- One-stop shop for applicants and licensees
- Regulatory consistency in reviews
- Conserves staff and applicant/licensee resources resulting in efficient reviews
 - Potential to avoid multiple rounds of requests for additional information
- Simplifies licensing because the methods, techniques, and requested data described in regulatory guidance are known to meet the stated regulations

Feedback Requested

- Implementation would involve using one Regulatory Guide update as a 'pilot' - feedback and lessons learned from that update would be used to inform future Regulatory Guides.
 - One option: Sizing of batteries (Regulatory Guide 1.212, endorses IEEE Standard 484, “IEEE Recommended Practice for Sizing Lead-Acid Batteries for Stationary Applications”)
 - Consideration of terminology of “items relied on for safety (IROF)”
- Consistent with NRC value of openness, we are requesting feedback on the strategy.
 - Any Challenges?

Acronyms

- CFR – Code of Federal Regulations
- IEEE – Institute of Electrical and Electronics Engineers
- IROF – items relied on for safety

QUESTIONS/COMMENTS

Public Participation

At this time, the public is afforded an opportunity to ask questions and/or provide comments on the following topics:

- Non-fee Billable Work Expenditures
- Fuel Facility Licensing
- CUI Implementation
- MC&A for Category II Facilities
- Inclusion of Fuel Facilities in Electrical RGs

Recap of Action Items – Days 1 and 2

Jonathan Rowley, Project Manager

Division of Fuel Management

Office of Nuclear Material Safety and Safeguards

Closing Remarks

Shana Helton, Director

Division of Fuel Management

Office of Nuclear Material Safety and Safeguards

Janet Schlueter, Senior Director

Fuel and Radiation Safety

Nuclear Energy Institute