

U.S. NUCLEAR REGULATORY COMMISSION SUMMARY OF THE MAY 31, 2024,
OBSERVATION PREAPPLICATION PUBLIC MEETING
WITH SMR, LLC (A HOLTEC INTERNATIONAL COMPANY)
TO DISCUSS THE TOPICAL REPORT ON THE QUALITY ASSURANCE PROGRAM FOR
HOLTEC INTERNATIONAL'S SMALL MODULAR REACTOR DESIGN AND
CONSTRUCTION

Meeting Summary

The U.S. Nuclear Regulatory Commission (NRC) held an observation public meeting on May 31, 2024, with SMR, LLC (SMR), a Holtec International Company (Holtec), to clarify information related to remote source verification discussed in Revision 1 of the Topical Report on the Quality Assurance Program for its small modular reactor design and construction.^{1, 2}

There was no closed session to discuss proprietary information. No decisions or commitments were made during this meeting. The meeting was attended by representatives from SMR (Holtec), the NRC and members of the public.

The following summarizes the discussion during the meeting:

- Following the introductions of both the NRC staff and SMR (Holtec), the NRC staff discussed the information in the topical report referring to remote source verification during exigent conditions. The NRC staff referenced an NRC endorsed Electric Power Research Institute (EPRI) report that provides guidance to conduct remote source verification.³ The NRC staff further explained that a commitment in the topical report to conduct such verification without details on how the verification would be conducted will result in a plant specific action item for a future applicant incorporating the topical report.
- SMR (Holtec) described that the topical report under NRC staff review is consistent with another NRC approved Holtec Quality Assurance Program for radioactive material packages received in 2022.⁴ The NRC staff noted that this approval was granted under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 71, Subpart H, which have different requirements from the quality assurance criteria applicable to power reactors in Appendix B to 10 CFR Part 50.

¹ Letter from A. Brenner, "SMR, LLC – Submittal of Licensing Topical Report, "Quality Assurance Program for Holtec International's Small Modular Reactor Design and Construction," Revision 1, dated April 19, 2024, Agencywide Documents and Access Management System (ADAMS) Accession No. ML24110A089 part of ML24110A088.

² SMR, LLC, (Holtec), Licensing Topical Report HI-2230815, "Quality Assurance Program for Holtec International's Small Modular Reactor (SMR) Design and Construction," Revision 1, dated April 19, 2024, ML24110A090 part of ML24110A088.

³ EPRI 3002019436-A, EPRI Report "Remote Source Verification During a Pandemic or Similar State of Emergency: Screening Criteria and Process Guidance," dated October 16, 2020, ML20300A384.

⁴ U.S. NRC Form 311, "Quality Assurance Program Approval for Radioactive Material Packages," Approval Number 0784, Revision 5, dated July 11, 2022, ML22187A034.

- SMR (Holtec) expressed concerns should it commit to the EPRI report (see footnote 3) for cases where it voluntarily implements actions above and beyond what is required. After a discussion of different scenarios on the implementation of the EPRI report, the NRC staff noted that the EPRI report only applies to remote source verification during exigent conditions. The NRC staff further clarified that a vendor is responsible for determining and documenting how it meets the regulations. Lastly, the NRC staff noted the risk of having guidance provided in a lower-level procedure that could change the original NRC evaluation.
- Near the end of the meeting, SMR (Holtec) confirmed it understood the NRC staff's concern and would propose a resolution considering the meeting discussion.
- SMR (Holtec) asked how a revision to the topical report to address this concern would affect the NRC staff's review schedule. The NRC staff stated that it would need to review the current schedule before providing a response.
- There were no questions or comments from members of the public observing the meeting.

The meeting was adjourned at 10:50 a.m.