



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

September 5, 2024

MEMORANDUM TO: Samantha Lav, Chief  
Fuel Facility Licensing Branch  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

FROM: Matt Bartlett, Sr. Project Manager  
Fuel Facility Licensing Branch  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

A handwritten signature in blue ink, appearing to read "Matthew Bartlett", is positioned to the left of the text "Signed by Bartlett, Matthew on 09/05/24".

Signed by Bartlett, Matthew  
on 09/05/24

SUBJECT: SUMMARY OF MEETING ON July 17, 2024, WITH TRISO-X LLC, TO  
ALIGN ON THE SUPPLEMENT RESPONSES TO THE  
MANAGEMENT MEASURES AND QUALITY ASSURANCE  
REQUESTS FOR ADDITIONAL INFORMATION, (ENTERPRISE  
PROJECT IDENTIFIER L-2022-PMP-0005)

The U.S. Nuclear Regulatory Commission (NRC) staff conducted a closed Microsoft Teams meeting with TRISO-X, LLC (TRISO-X) on July 17, 2024, from 3:00 p.m. until 5:00 p.m. to discuss their management measures and quality assurance (MM/QA) program. The purpose of the meeting was to align on TRISO-X's development of a supplement to support the response to requests for additional information (RAIs) that were submitted via letter dated July 28, 2023 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML23209A821). The TRISO-X original application was received April 5, 2022 (ML22101A200 - package) and was supplemented by letters dated October 13, 2022 (ML22286A144 - package), November 4, 2022 (ML22308A251 - package) and February 29, 2024 (ML24060A239).

The NRC staff has held a number of meetings with TRISO-X to discuss the supplemental information needed to resolve the RAIs including May 17, 2023 (ML24053A029), December 18, 2023 (ML24002A825), January 25, 2024 (ML24066A181 - package), and June 17, 2024 (ML24198A233 - package). This meeting continues these discussions, as summarized below.

CONTACT: Matt Bartlett, NMSS/DFM  
301-415-7154

Enclosure 2 transmitted herewith  
contains Security-Related  
Information. When separated from  
Enclosure 2, this document and  
Enclosure 1 are decontrolled.

The meeting involved additional discussion on the following open management measures RAIs:

- RAI 1-1 – “Construction Qualifications,”
- RAI 1-2 – “Quality Standards for Items Relied on for Safety (IROFS),” and
- RAI 1-4 – “Quality Assurance Elements for IROFS.”

TRISO-X requested to discuss RAI 1-4 first. The TRISO-X staff stated that they are not using a graded approach for management measures. The NRC staff agreed this approach is conservative and would resolve this RAI. For the RAI 1-1 regarding construction qualification, TRISO-X provided additional commitments to a minimum level of experience for personnel overseeing construction inspection. The NRC staff agreed this was a move in right direction but requested additional qualifications for senior managers. TRISO-X also clarified they would ensure construction contractors are appropriately qualified for the activities they conduct. The NRC agreed this was an improvement. The NRC staff emphasized that TRISO-X is responsible for overseeing construction related to IROFS and must ensure the personnel have an appropriate level of experience with construction of safety related systems. The NRC and TRISO-X discussed adding a clause to the minimum qualifications to ensure staff are qualified for the complexity, scope, and technical discipline they are overseeing.

For the RAI 1-2 regarding quality standards for IROFS, TRISO-X pointed out their quality assurance program would be based on ISO 9001:2015, “Quality management systems.” The NRC staff stated that stating the TRISO-X program is based on a standard is not a commitment. TRISO-X pointed out that they commit to implement the 18 quality assurance elements identified in NUREG-1520, Revision 2. The NRC staff agreed, but stated the level of information is very high level and repeats back language from the guidance. It does not provide sufficient description of the program for implementing the 18 elements. TRISO-X indicated the information will be placed in the implementing procedures on site. The NRC staff discussed the need for TRISO-X to revise the response to commit to ISO 9001:2015, as supplemented in the license application.

TRISO-X indicated they would be interested in holding another meeting on MM/QA to discuss how they apply the quality assurance program to IROFS. A list of participants is provided as Enclosure 1. Additional meeting summary information is provided in Enclosure 2 (non-public).

Docket No. 07007027

Enclosures:

1. Participant List (public)
2. Additional Meeting Summary (non-public)

cc: [trisox@listmgr.nrc.gov](mailto:trisox@listmgr.nrc.gov)

S. Lav

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SUBJECT: SUMMARY OF MEETING ON JULY 17, 2024, WITH TRISO-X LLC, TO ALIGN ON THE SUPPLEMENT RESPONSES TO THE MANAGEMENT MEASURES AND QUALITY ASSURANCE REQUESTS FOR ADDITIONAL INFORMATION, (ENTERPRISE PROJECT IDENTIFIER L 2022 PMP 0005)

DOCUMENT DATE: September 5, 2024

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**ADAMS Accession Nos.: ML24228A125 (pkg), ML24228A128 (memo), ML24228A126 (encl 1), ML24228A127 (encl 2, non-public)**

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