



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

February 4, 2025

MEMORANDUM TO: Shana R. Helton, Director
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

THRU: Samantha C. Lav, Acting Chief
Fuel Facility Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

A handwritten signature in blue ink, appearing to read "Samantha C. Lav".

Signed by Lav, Samantha
on 02/04/25

FROM: Jonathan G. Rowley, 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 "Jonathan G. Rowley".

Signed by Rowley, Jonathan
on 02/04/25

SUBJECT: SUMMARY OF NOVEMBER 13, 2024, FUEL FACILITY STAKEHOLDER
PUBLIC MEETING

The staff of the U.S. Nuclear Regulatory Commission (NRC) conducted a hybrid meeting (in-person and virtual via Microsoft Teams) with representatives of the Nuclear Energy Institute (NEI), the fuel facility industry, and members of the public on November 13, 2024. The purpose of this observation meeting (formerly category 2) was to discuss the status of several regulatory issues involving the fuel facility industry. Topics discussed during the meeting included: update on NRC management changes of interest to fuel cycle facilities, the resolution of action items from the May 1, 2024, fuel facility stakeholder meeting; updates to the integrated schedule and its supplement; timeliness of decommissioning funding plan reviews, the Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy (ADVANCE) Act; the effort factors used in fuel facility annual fee calculations; feedback and recent interactions regarding the current licensing program; integrated safety analysis (ISA) considerations and designation of items relied on for safety (IROFS) for natural phenomena-initiated events, feedback on public dashboards, and a report on the Industry Regulatory and Inspection Summit and its applicability to fuel cycle facilities.

The public meeting notice with the agenda topics and the meeting presentations are available in the Agencywide Documents Access and Management System (ADAMS) under Accession Nos., [ML24317A208](#), [ML24310A188](#), and [ML24320A120](#) respectively. No regulatory decisions or commitments were made during the meeting.

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The activities started with the NRC staff providing an overview of the meeting's category, purpose and logistics. Opening remarks were provided by Shana Helton, Director of the Division of Fuel Management (DFM), and Greg Core, Fuel Cycle Facilities and Transportation Director, NEI.

After the opening remarks, the NRC provided an update of the senior management changes within the NRC Commission and DFM, and the fuel cycle facility related reorganization within Region II.

Next, the NRC staff provided an update on the resolution of the action items from the Spring 2024 Fuel Facility Stakeholders Public Meeting. The action items included the following:

Action Item 1:

The NRC and NEI/Industry shall exchange any meeting presentation materials at least one week prior to the scheduled meeting date.

The DFM has taken steps for planning and conducting the bi-annual fuel facility stakeholders meeting to facilitate issuing the meeting presentation materials to the public at least 7 days prior to the meeting.

This action item is an ongoing periodic action.

Action Item 2:

The NRC staff will maintain a current Integrated Schedule of Regulatory Activities chart on the NRC public website for the fuel facility stakeholders meeting.

The NRC website (<https://www.nrc.gov/materials/fuel-cycle-fac/regs-guides-comm.html#cumeffects>) is updated at least twice a year prior to each stakeholder meeting and as needed when new items are added.

This action item is an ongoing periodic action.

Action Item 3:

The NRC will consider adding the Department of Homeland Security initiative resulting from the Cyber Incident Reporting for Critical Infrastructure Act of 2022 to the Integrated Schedule of Regulatory Activities chart. The industry acknowledges that this is not within the NRC's purview but affects the fuel cycle industry.

To maintain the clear and effective communication provided by the Integrated Schedule of Regulatory Activities, content of the chart will remain limited to activities directly under the NRC's control.

This action item is closed.

Action Item 4:

If requested by the industry, the NRC will host a meeting to further discuss structures as items relied on for safety.

A public meeting on ISA consideration and designation of IROFS was held on June 27, 2024 (ML24191A343).

This action item is closed.

Integrated Schedule Chart and Supplement Updates

The NRC staff provided updates made between May 2024 and November 2024 to the rulemaking and regulatory activities impacting the fuel cycle industry listed on the integrated schedule of the regulatory activities chart. The integrated schedule supplement was also updated with changes from May to November. A detailed summary of the changes to the chart is provided by [ML24305A156](#). The NRC staff posted the updated integrated schedule and updated supplement on the NRC public website site at <https://www.nrc.gov/materials/fuel-cycle-fac/regs-guides-comm.html#cumeffects>.

Timeliness of Decommissioning Funding Plan Reviews

The fuel cycle industry desired to have a conversation about the frequency at which licensees need to submit decommissioning funding plans (DFPs). The NRC staff presented some of the background information that help to determine the current three-year basis for the submittal of DFPs by the licensees.

The NRC staff and the fuel cycle industry discussed suggestions that are believed to benefit both the industry and the NRC. The NRC staff suggested the industry provide a redline version of the DFP to make it more efficient for the NRC to see the changes from the previous DFP submittal, the industry indicated it would provide the NRC notification if the incoming DFP contained substantial changes to aid the NRC in estimating the number of hours needed to perform the review, and the NRC staff suggested using a standard format for the DFPs as outlined in NUREG-1757, Volume 3, Revision 1.

Accelerating Deployment of Versatile, Advanced Nuclear Clean Energy (ADVANCE) Act of 2024

The NRC staff provided an overview of the ADVANCE Act, ADVANCE Act tasks assigned to or supported by NMSS, and ways that NMSS is already addressing some of the activities stemming from the ADVANCE Act.

The fuel cycle industry presented and explained its perspectives on implementation of the ADVANCE Act. The fuel cycle industry perspectives included: requiring precedent reviews in licensing actions, establishing licensing project health metrics, and increased transparency and improved accountability of licensing reviews through NRC leadership discussions. An additional suggestion offered by the industry involved the NRC establishing core review teams for licensing actions.

Members of the NRC ADVANCE Act core team were in attendance to assist with answering questions from the industry and public. The core team informed the attendees that the NRC is looking at a radical rethinking of how regulatory activities are performed in the U.S.

Effort Factors

The NRC staff informed the attendees of how effort factors are used to allocate annual fees across the different classes of licensees in the fee class. The NRC staff presentation covered the background on the effort factors, effort factor processes, and effort factor matrix values.

The fuel cycle industry desired to learn and understand where NRC time is spent when planned actions that are used to generate the NRC budget are not submitted as planned (un-utilized Part 170 fees). An action item was taken to have a discussion on that during the Spring 2025 stakeholder meeting.

Current Licensing Program Feedback and Recent Interactions

The NRC staff informed the meeting attendees about the consideration of targeted updates to NUREG-1520, Revision 2, "Standard Review Plan for Fuel Cycle Facilities License Applications." Past interactions and conversations with licensees have resulted in the identification of potential areas for revision. Prior to beginning targeted revisions to NUREG-1520, the industry and the NRC agreed to take an action to develop separate lists of areas for targeted updates and then come together to compare and contrast in a future meeting or workshop.

There was a discussion of the lessons learned from the reviews of recent major license amendment requests. The NRC staff and the industry spoke favorably of the pre-application activities, calls to discuss the requests for additional information (RAIs) in draft form prior to formal issuance of the RAIs, the importance of audits and site visits during the review process, the importance of quality submittals and quality information in the responses to RAIs. The industry added that the pre-application activities would be better if some of the activities occurred on-site and were more purpose driven. The industry raised the idea of the NRC sending a select group of staff to the site during the acceptance phase of the review. The industry also suggested that the NRC staff devise a way to decrease the time of administrative activities (such as time attaining signatures and no legal objection).

Fuel Cycle Facility Inspection Program Self-Assessment

The NRC staff provided a presentation reviewing the findings of the recently completed fuel cycle facility inspection program self-assessment. The fuel cycle industry communicated that they appreciated the information in the self-assessment report and generally were supportive of periodic self-assessments. The fuel cycle industry noted that there was a recommendation in the self-assessment to form a working group to investigate Part 21 applicability at Part 70 facilities. The fuel cycle industry expressed interest in this topic and concern that the NRC staff was re-opening a topic that from their perspective had already been closed in previous discussions. The NRC staff clarified that any working group recommendations that could impact the industry would be communicated prior to implementation.

Update on ISA Considerations and Designations of IROFS for Natural Phenomena-Initiated Events

The NRC staff and the fuel cycle facility industry discussed ISA considerations and designations of IROFS for natural phenomena-initiated events. The NRC staff reaffirmed its position on the regulations and guidance for acceptable methods that applicants can demonstrate reasonable assurance of adequate protection for postulated natural phenomena-initiated events. The NRC

staff suggested this topic be discussed, as needed, by applicants during pre-application discussions supporting future applications.

Feedback on Fuel Facility Dashboards

The NRC staff provided a presentation on the dashboards being used for new license applications and major license amendments. The presentation explained the current features that are intended to enhance the visibility and accountability of licensing reviews, provide insight on resource expenditures vs. estimates, and track schedule progress. The NRC staff solicited feedback from the fuel cycle facility industry. Feedback received included adding better explanation of the values that appear on the dashboards and correcting standard text that is misleading (such as indicating “none” under tabs for which there is no activity rather than the fields being blank).

Report on the Industry Regulatory and Inspection Summit (IRIS) and Applicability to Fuel Cycle Facilities

The NRC staff provided a report on the IRIS held in Region II between the NRC and the nuclear reactor industry. The fuel cycle facility industry desired the information to help determine if a similar activity would be of benefit to them. The fuel cycle facility industry expressed interest in holding a forum in a similar vein as the IRIS on licensing best practices.

Summary of Meeting’s Discussions

Following the completion of the discussions of the agenda items, the NRC staff provided a summary of the discussions held during the day. The NRC staff concluded the meeting with closing remarks by Shana Helton, Director, DFM, and Greg Core, Fuel Cycle Facilities and Transportation Director, NEI.

Adjourn

Neither the NRC staff, the NEI, industry, nor members of the public raised further questions or comments, and the meeting was adjourned at 3:30 p.m. The NRC staff plans to conduct its next fuel facility stakeholder meeting during the Spring of 2025.

Action Items

The following action items resulted from the discussions during the meeting:

1. The NRC will continue making meeting materials available to the public at least 7 days in advance of the meeting.
2. The NRC will continue to maintain an up-to-date Integrated Schedule of Regulatory Activities chart on its [public webpage](#).
3. A discussion on what happens to unutilized Part 170 fees is to be include in the Spring 2025 stakeholder meeting.
4. The industry and the NRC should develop separate lists of areas for targeted guidance updates and then meet to compare the lists before the NRC begins revising NUREG-1520.
5. The NRC will schedule a meeting or workshop on licensing best-practices and areas of improvement in conjunction with the spring 2025 fuel facility stakeholders meeting.

Enclosure:
List of Attendees

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DOCUMENT DATE: February 4, 2025

DISTRIBUTION:

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OFFICE	NMSS/DFM/FFLB	NMSS/DFM/FFLB	NMSS/DFM/FFLB
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DATE	1/22/2025	1/23/2025	2/4/2025
OFFICE	NMSS/DFM/FFLB		
NAME	JRowley		
DATE	2/4/2025		

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LIST OF ATTENDEES

NOVEMBER 13, 2024, FUEL FACILITY STAKEHOLDERS PUBLIC MEETING

Name	Affiliation
Aaron Totemeier	Electric Power Research Institute
Adam Stein	Breakthrough Institute
Anthony Ponko	The U.S. Nuclear Regulatory Commission (NRC)
Araceli Billoch Colon	NRC
Armand Laferrere	Orano USA
Ashby Bridges	General Matter
Ashley Morris	Nuclear Fuel Services
Benjamin Karmioli	NRC
Bob Sanders	Honeywell
Bradley Davis	NRC
Brandon Hanson	Framatome
Brian Wagner	NRC
Brian Zaleski	NRC
Cameron Hughes	Member of the public
Cameron Ubben	NRC
Camille Zozula	Westinghouse Electric Company
Caylee Kenny	NRC
Celimar Valentin-Rodriguez	NRC
Chad Oelstrom	NRC
Charles Stanko	NRC
Cinthya Roman	NRC
Claire Nicolae	Idaho National Labs
Cynthia Taylor	NRC
Dan Watts	Centrus / ACO
Daniel Ashworth	BWXT Nuclear Operations Group
Dante Johnson	NRC
David Tiktinsky	Bostonbout Services, Nano Nuclear Energy
Diana Woodyatt	NRC
Diane Jackson	NRC
Doug Weaver	Contractor
Eben Allen	NRC
Eric C Michel	NRC
Ethan Tievy	NRC
Florent Burel	Orano USA
George Tartal	NRC
Greg Core	Nuclear Energy Institute (NEI)
Gregg Goff	NRC
Gregory Trussell	NRC
Heather B Petterson	Nuclear Fuel Services
Irene Wu	NRC
Isaac Wang	NRC

Jack Britt	NEI
James Downs	NRC
James Hammelman	NRC
Jay Diaz	Member of the public
Jessica Moses-Arnone	NRC
Jim Tomkins	Member of the public
Jonathan Marcano Lozada	NRC
Jonathan Rowley	NRC
Jose Diaz	NRC
Joy Jiang	Breakthrough Institute
Juan Lopez	NEI
Justin Raudabaugh	NRC
Kalene Walker	Member of the Public
Kelly Sullivan	NRC
Kenneth Kline	NRC
Kimyata Morgan-Butler	NRC
LaDonna Suggs	NRC
Langston Lewis	NRC
Linda Howell	NRC
Lisa Dimmick	NRC
Louis Caponi	NRC
Luis Betancourt	NRC
Maddie Blalock	The U.S. Senate Committee on Environment and Public Works
Martin Ortiz Gonzalez	NRC
Matt Bartlett	NRC
Matthew Doyle	NRC
Meg Day	NRC
Michael Greenleaf	NRC
Michelle Albert	NRC
Mike Call	NRC
Mike King	NRC
Nicole Coover	NRC
Noah Woodyard	NRC
Oliver Barrett	Member of the public
Omar Lopez-Santiago	NRC
Osiris Siurano-Perez	NRC
Peter Vescovi	Orano USA
Phil Brochman	NRC
Ravi Penmetsa	NRC
Robert Link	NEI
Robert Mathis	NRC
Robert Sun	NRC
Sean Patterson	Honeywell
Shana Helton	NRC
Shilp Vasavada	NRC

Spencer Toohill	Breakthrough Institute
Stephen Poy	NRC
Steven Pope	Information Systems Laboratories
Suzanne Ani	NRC
Tekia Govan	NRC
Tim Knowles	Global Laser Enrichment
Tim Tate	Framatome
Tom Boyce	NRC
Wyatt Padgett	Urenco USA
Yawar Faraz	NRC
Yilia Vega Claudio	NRC