

Highlights

- The NRC staff discussed their plans to develop implementing guidance for the agency's new mission statement developed in response to ADVANCE Act requirements, breaking down the mission statement into four distinct elements, with expectations/behaviors (currently a work in progress) for each element.
- The NRC will create a "general guidance document" explaining effective implementation of the mission statement for all NRC staff; it would include the general expectations/behaviors for all staff, with appendices that will provide on expectations for the agency organizational functions (e.g., licensing oversight, emergency preparedness, mission support). "Success Templates" will also be included (e.g., Kairo's Hermes review). Ultimately guidance will be included in Management Directors, Office Instructions, organizational performance expectations and metrics; the NRC also plans to perform training as well.
- An information paper (with guidance included) is due to the Commission this May, and a report to Congress due in July).
- The staff will have further "Town Hall" type meetings on the implementation guidance.

Discussion

The NRC staff discussed their plans during a March 13 meeting to develop implementing guidance for the agency's new mission statement developed in response to ADVANCE Act requirements: "The NRC protects public health and safety and advances the nation's common defense and security by enabling the safe and secure use and deployment of civilian nuclear energy technologies and radioactive materials through efficient and reliable licensing, oversight, and regulation for the benefit of society and the environment." In opening statements, NRC's Mike King said the goal is to "help ensure the staff across the agency sees themselves clearly in what the mission statement means to them, and how it applies to their job, so we can most effectively implement the updated statement."

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To develop guidance, the staff segmented the mission statement into four elements with principles and expectations/behaviors under each. Notable expectations included in each element are described below (for full list of expectations, see slides 8-16 in the NRC's [presentation](#))

- **Element I**, "The NRC protects public health and safety and advances the nation's common defense and security..." – one of the expectations is to risk-inform every decision by applying every step in [Be riskSMART](#) and revise Be riskSMART to emphasize the need to use all relevant data, evidence and information to make decisions.
- **Element II**, "... by enabling the safe and secure use and deployment of civilian nuclear energy technologies and radioactive materials..." - in addition to timeliness, flexibility, adaptability, a

notable expectation is accepting an appropriate amount of risk – perfection is the enemy of good. In addition, the expectations note a Strategic Direction Initiative on consulting vs. guidance. [Editor's Note: During the Regulatory Information Conference held March 11-13, Chairman David Wright commented that ADVANCE Act provides an opportunity to be more collaborative – this doesn't mean the staff should become consultants, but if the staff knows exactly what information is needed in order to make a finding, that should be communicated. "We don't have to tell them how to do it, or how to get it, but they should know clearly, openly and transparently from us what is needed."]

- **Element III**, "... through efficient and reliable licensing, oversight, and regulation..." - notable expectations include applying the [Principles of Good Regulation](#) (POGR) "unfailingly" in discussing options and recommending the path forward; prompt resolution of differing views; meaningful metrics at every level; and consistency among regions.
- **Element IV**, "... for the benefit of society and the environment" - in addition to meaningful public engagement and POGR directing its work, a notable expectation is to consider both what can go wrong and also what can go right in applying Be riskSMART.

The staff also is considering additional guidance for its licensing staff, most already addressed as part of the "[NRR expectations memorandum](#)" these include:

- Applying risk-informed principles when strict, prescriptive application of deterministic criteria such as the single failure criterion is unnecessary to provide for reasonable assurance of adequate protection of public health and safety; this was [direction](#) from the Commission related to application of single failure criterion to NuScale's inadvertent actuation block valves
- Proactively consider initiating exemptions on a case-by-case basis. [Editor's Note: The context provided on this bullet and the above was that NRC needs to be flexible given technology is changing, and there may be less risk – some deterministic criteria does not apply to the technology; an applicant can engage with the NRC to determine if it can be exempt from that requirement.]
- Use pre-application engagement to understand unique technical aspects and align on regulatory paths.
- Complete draft safety evaluation reports with placeholders before requesting additional information.
- Streamline safety evaluation content.
- Increase use of audits and requests for confirmatory information.
- Plan resources and timelines and track execution.

Additional guidance for inspection staff under consideration: (also discussed in a [recent meeting](#) addressing ADVANCE Act Sec. 507) include:

- Focus inspection samples on those with the greatest risk significance.
- If an issue can reasonably be determined to be of very low safety/security significance AND would take a significant amount of time to resolve, then the inspector is empowered to not follow up any further or enter the Very Low Safety Significance Issue Resolution (VLSSIR) process.
- Complete inspection activities on schedule and within allotted resources; in-office review should only be used if the licensee has not provided key information by the end of the inspection and there is a possible risk-significant issue.
- A successful inspection is one where objectives have been met **regardless of whether an issue or violation is identified.**

Mission support guidance is also being considered.

An information paper (with guidance included) is due to the Commission this May, and a report to Congress due in July).

The staff will have further "Town Hall" type meetings on the implementation guidance. - *Deann Raleigh, draleigh@curtisswright.com*