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DPBA TICKET

19-Mar-01

Assigned	PAB
Item No	2001-056
Priority	JMG3
From	King
Office	RES
To	Funches
Date	03/16/2001
Due Date	03/23/2001
OCFO No	2001-101
Subject	Concurrence-SECY Paper re: Plan for Pre-Application Activities on the Pebble Bed Modular Reactor (PBMR)
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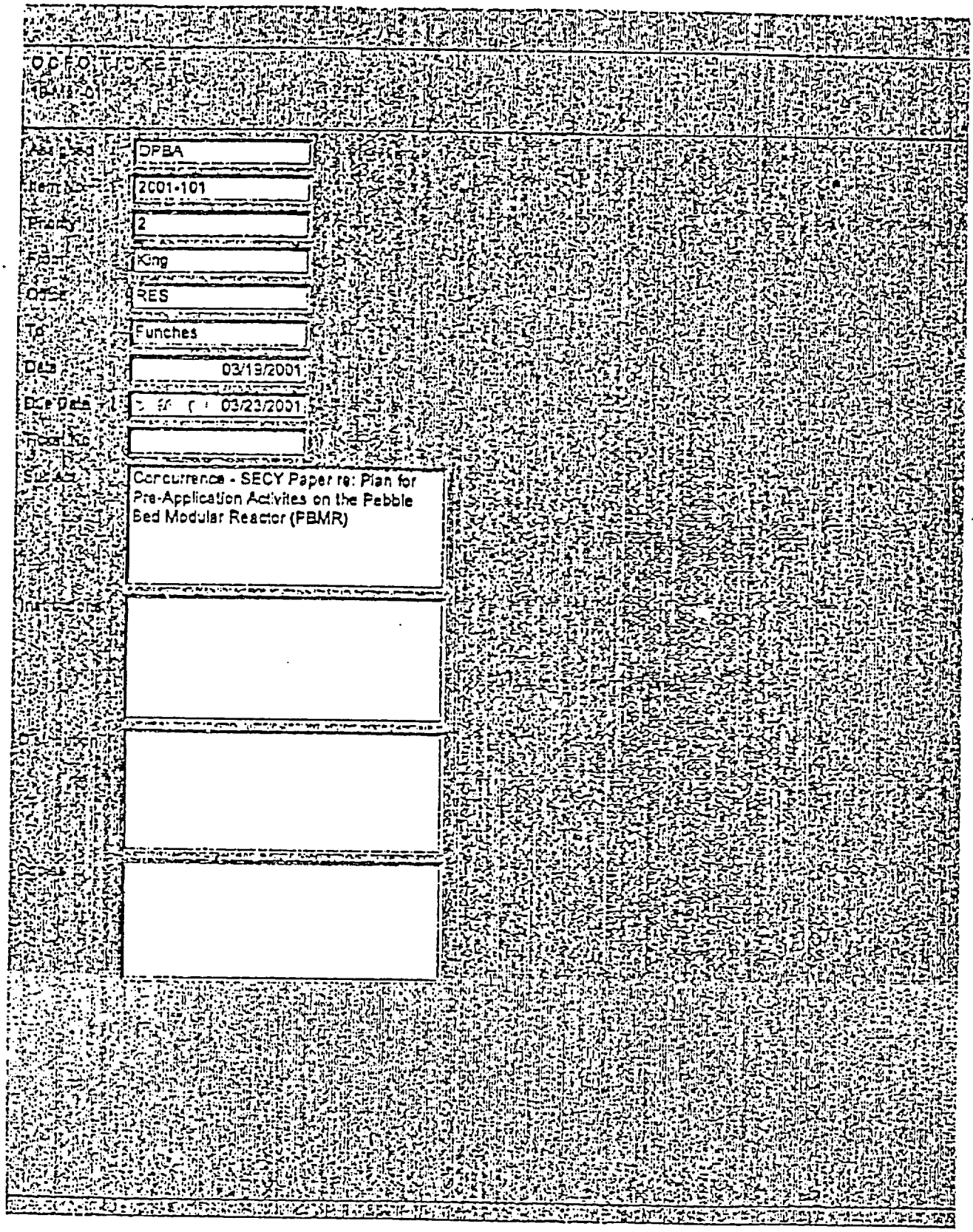

OFFICE RECORD

Issued	DPBA
Item No	2001-101
Rev No	2
From	King
Office	RES
To	Funches
Date	03/19/2001
Due Date	03/23/2001
Proj No	
Subject	Concurrence - SECY Paper re: Plan for Pre-Application Activites on the Pebble Bed Modular Reactor (PBMR)

ROUTING AND TRANSMITTAL SLIP

DATE:March 16, 2001

TO: THE COMMISSIONERS

FROM: William D. Travers

SUBJECT: PLAN FOR PRE-APPLICATION ACTIVITIES ON THE PEBBLE BED MODULAR REACTOR (PBMR)

ORIGINATOR/SECRETARY: Angelina Chapeton

ROOM NO./BLDG: T10 E 52
PHONE NO.: 415-5728

****

SIGN AND/OR

	CONCUR	DATE
1. TKing	RC	3/14
2. TECH Editor	____	/ /
3. AThadani	____	/ /
4. SCollins	____	/ /
5. MVirgilio	____	/ /
6. OGC	____	/ /
7. CFO	____	/ /
8. CPaperiello	____	/ /
9. WTravers	____	/ /

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AS REQUESTED:	NOTE & RETURN:	PREPARE REPLY:
COORDINATION:	PER CONVERSATION:	

FOR PARALLEL CONCURRENCE:

WITTS20000117 - Due to EDO - 3/30/01

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FOR: The Commissioners

FROM: William D.Travers
Executive Director for Operations

SUBJECT: PLAN FOR PRE-APPLICATION ACTIVITIES ON THE PEBBLE BED MODULAR REACTOR (PBMR)

PURPOSE

To request Commission approval to proceed with pre-application activities on the PBMR.

BACKGROUND:

On November 14, 2000, representatives from Exelon Generation Company informally expressed their desire for early (pre-application) interactions with the staff directed toward establishing the feasibility of licensing a PBMR in the United States. The PBMR is a modular high-temperature gas-cooled reactor (HTGR) being developed in the Republic of South Africa (RSA). Subsequently, in a letter dated December 5, 2000, Exelon formally requested such early interactions (Attachment 1). An initial meeting with Exelon was held on January 31, 2001 at NRC HQ to discuss the PBMR design and technology and the pre-application plans for the PBMR. Based upon the initial meeting, Exelon has indicated that it is their desire to have the pre-application phase completed by July 2002. Subsequently, the Commission issued a Staff Requirements Memorandum (SRM), dated February 13, 2001, which requested the staff to assess its readiness for new nuclear plant construction including the pebble bed reactor.

CONTACT: Thomas L. King, RES
301-415-5790

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DISCUSSION:

Consistent with my memorandum of November 14, 2000, on advanced reactors, RES has taken the lead (in coordination with NRR and NMSS) to develop a plan for pre-application activities on the PBMR. This plan is provided as Attachment 2 and involves technology assessment, regulatory framework and regulatory process assessment activities. It is estimated that approximately 18 months would be required to complete the plan.

As part of the PBMR technology assessment activities the staff would familiarize itself with HTGR designs, technology and safety issues and identify NRC scientific and technology research needs. As part of the PBMR regulatory framework and regulatory process assessment activities the staff would become familiar with the PBMR design, assess regulatory requirements applicable to the PBMR and Exelon's approach to licensing, and identify key licensing issues and regulatory policy issues needing resolution. These activities would build upon the staff's previous domestic and international HTGR experience and its advanced light water reactor (ALWR) design and regulatory reviews. Enhancements in NRC resources and infrastructure needed to conduct an actual licensing review and inspection of a new PBMR plant and fuel facility would also be identified.

Commission approval is requested to begin the PBMR pre-application activities described in the plan. With respect to the PBMR, we believe that the plan is consistent with the Commission SRM and is responsive to Exelon's request. However, certain activities will be completed later than Exelon has requested. For example, assuming a start date in late April 2001, completion of the pre-application activities would more likely be in Fall 2002 in lieu of July 2002 as requested by Exelon.

Early interactions with potential applicants are encouraged by and consistent with the Commission's policy statement on advanced reactors. Because of the active interest in the PBMR and requests of Exelon, this plan is being forwarded to the Commission in advance of the broader readiness assessment being developed in response to the February 13, 2001 SRM.

RESOURCES:

EX.5

The ~~U.S. Department of Energy~~ (DOE) also considers an NRC safety and technology assessment of modular HTGRs, like the PBMR, as providing fundamental input for evaluating their advanced reactor program. Accordingly, DOE has recently inquired into the feasibility of NRC conducting such an assessment and has indicated that they would be willing to fund (FTE

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Portions withheld - EX 5

and contractor support) a portion of the work. DOE funding would support technology assessment and transfer activities that are generically applicable to modular HTGRs, including the PBMR. It is expected that most of the work for DOE would benefit the staff by developing the understanding, expertise and capabilities it would need to conduct future licensing reviews of modular HTGRs, including the PBMR. However, the DOE funding scope would not include safety and technology assessment work that is applicable only to the PBMR.

[redacted] EX 5

Exelon would be charged a fee in accordance with 10 CFR Part 170.21 for NRC resources (FTE and contractor support) expended for assessment activities that are specific to the PBMR design and for all of the staff's PBMR regulatory framework and regulatory process assessment activities. Additionally, an actual license application for a modular HTGR such as the PBMR would be conducted on a fee recoverable basis in accordance with 10 CFR Part 170.21.

COORDINATION:

The Office of the General Counsel has no legal objection to this paper. The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objections.

RECOMMENDATION:

That the Commission approve proceeding with pre-application activities on the PBMR, including the DOE-sponsored modular HTGR technology assessment and transfer activities, described in Attachment 2. Early feedback on this recommendation is requested in order to support a late April 2001 initiation of the pre-application activities.

William D. Travers
Executive Director
for Operations

Attachments: (1) December 5, 2000, Exelon letter
(2) Plan

Portions withheld - EX 5

Distribution: DRAA Chron, W. Travers, C. Paperiello, F. Miraglia, A. Thadani, M. Federline, S. Collins, R. Zimmerman, W. Kane, G. Holahan, D. Matthews, J. Wilson, F. Eltawila, M. Mayfield, T. King, J. Dunn Lee, H. Faulkner, M. Virgilio, M. Weber, D. Carlson, S. Rubin, P. Bird, K. Raglin, M. Bridgers-WITS20000117

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Exelon Generation

Attachment 1

December 5th, 2000

Document Control Desk
U.S Nuclear Regulatory Commission
Washington, DC 20555-0001

Attn Mr William Travers

Subject Pebble Bed Modular Reactor Review Requirements

Dear Mr. Travers.

As you are aware, Corbin McNeill, the co-CEO of Exelon Corporation, has expressed interest in the Pebble Bed Modular Reactor (PBMR) technology. Exelon and several partners are currently trying to determine the technical, economic, and licensing feasibility of the PBMR design worldwide, including here in the United States.

The NRC's "Statement of Policy for Regulation of Advanced Nuclear Power Plants" (July 8, 1986) encourages the earliest possible interaction between the agency and applicants to provide licensing guidance. In line with this policy, Exelon and our partners request to formally engage with the NRC Staff for exploratory discussions on how we could most efficiently proceed with licensing the PBMR. We expect these discussions to help us determine if the PBMR is a viable project, in advance of our decision to be taken later. We would expect to identify review assumptions, policy issues to be considered, and to establish an estimate of cost and schedule for preliminary NRC PBMR technology education and review. It is our intent that subsequent phases could be identified during these initial discussions. We would like to target completion of a first meeting by January 12, 2001.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

James A Muntz
Vice President
Nuclear Projects

xc: C. A McNeill, Jr.
E. F Sproat, III
D. Nicholls (Eskom)
P. H. Readle (BNFL)
J Colvin (NEI)
Honorable B Richardson (DOE)
W D. Magwood (DOE)

EDO --G20000567

Attachment 2

Plan for Pre-application Activities on the PBMR

INTRODUCTION

In a letter dated December 5, 2000, to William Travers, Exelon Generation Co. requested pre-application interactions with NRC directed toward assessing the viability of certification of a pebble bed modular reactor (PBMR) in the United States. The PBMR is a modular high-temperature gas-cooled reactor (HTGR), utilizing helium as the coolant and having online refueling capability, similar to HTGRs developed in Germany in the 1970s and 1980s. The current design is being developed in the Republic of South Africa (RSA) where a full-scale prototype PBMR module may be built and demonstrated. In addition to being a non-LWR, the design concept of the PBMR being developed in the RSA has other features which together are characteristic of (and unique to) modular high-temperature gas-cooled reactors. These characteristics makes their approach to protecting public health and safety very different from reactor designs currently licensed in the United States. Chief among these features are:

- passive decay heat removal processes that are to be demonstrated under postulated accident conditions

- coated UO_2 fuel particles that are designed to contain the fission products and to be demonstrated at very high (accident) temperatures

- low power density (an order of magnitude below that for LWRs) with large thermal capacity that are to be demonstrated to provide for slow transient behavior

- no conventional containment building

- a significantly reduced emergency planning zone (EPZ)

- multi-modular site concept with incremental power generation

The Commission's Policy Statement on Advanced Reactors encourages early interactions on such advanced designs so as to facilitate the resolution of safety issues early in the design process.

Concurrently, DOE has informally inquired into the feasibility of the NRC staff conducting an independent assessment of modular HTGR technology and safety in order to assist in assessing their advanced reactors program. The proposed assessment (which would be conducted with DOE funding) would examine the design and the safety basis for modular HTGRs (including the PBMR) from a generic perspective. The assessment would include DOE support for the development of key analytical tools and NRC staff expertise in order for the NRC to conduct qualitative and quantitative safety assessments of modular HTGR reactors such as the PBMR. It is expected that most of the work for DOE would benefit the staff by developing the understanding, expertise and capabilities it would need to conduct a future licensing review of a modular HTGR, including the PBMR.

For NRC to be prepared to review the PBMR in a timely fashion, pre-application activities are proposed consistent with the Commission's Advanced Reactor Policy Statement. It is proposed that the staff conduct: (1) a preliminary assessment of the modular HTGR (including PBMR) technology and safety, and (2) a preliminary assessment of the regulatory framework and regulatory process for the PBMR. The objectives of these activities would be as follows:

Modular HTGR Technology Assessment:

- conduct early interactions with DOE on the NRC preliminary technology assessment scope and content to meet both NRC and DOE needs
- familiarize a nucleus of staff with the design and technology of modular HTGRs and their approaches to safety
- develop key analytical tools and an independent staff capability to quantitatively assess the safety performance of modular HTGRs
- identify key generic technology issues with safety and research implications
- educate and train a nucleus of staff in modular HTGR technology

PBMR Regulatory Framework and Process

- conduct early interactions with Exelon on their PBMR design and technology
- conduct early interactions with Exelon on their proposed licensing approach
- identify a resolution approach for key PBMR safety and technology issues
- evaluate the applicability of current regulatory criteria to the PBMR
- identify and solicit Commission guidance on PBMR policy issues
- address NRC infrastructure, research, and resource needs to support a PBMR licensing review, and reactor and fuel facility inspections.

Modular HTGR technology issues and areas which are unique to the PBMR being developed in the RSA (and therefore not included in the scope of the DOE modular HTGR technology assessment scope) would be assessed directly through interactions with Exelon. These design-specific assessments will identify key issues with safety, technical and policy implications

The outcomes of these technology assessment, regulatory framework and regulatory process assessment activities would be staff familiar with modular HTGRs, including the PBMR; identification of key safety and policy issues; infrastructure, research, and resource needs to perform an actual modular HTGR licensing review and facility inspections; and preliminary guidance for the staff and potential applicants sufficient to establish the expectations for licensing. Documentation would be via SECY papers to the Commission, letter reports to DOE and letters to Exelon (i.e., a pre-application safety evaluation report would not be written).

PROPOSED PLAN

This paper describes a plan for pre-application activities, which involve technology, safety, regulatory framework and process assessment activities. These activities are directed toward modular HTGR technology transfer and preparing the agency for a possible application to license a modular HTGR, such as the PBMR, in the United States consistent with the above objectives. It is based upon experience in the past with pre-application reviews, including an earlier pre-application review of a DOE-sponsored modular HTGR, and would build upon that previous work. The plan describes pre-application activities that would last approximately 18 months and consists

of the following technology assessment, and transfer regulatory framework and process assessment elements:

Technology Assessment and Transfer

- familiarization with the design, safety, and research issues via:
  - interaction with Exelon
  - interaction with foreign partners and domestic organizations with HTGR or modular HTGR design, safety or operating experience
  - interaction with the RSA regulatory organization
- identification of reactor and materials safety issues, and related research needs
- technology assessment infrastructure and contractor support
- development and implementation of staff training

[redacted] Ex. 5

Familiarization with Design, Safety, and Research Issues

Initial staff technology assessment and transfer efforts will be directed toward becoming familiar with the modular HTGR (including PBMR) design, technology, safety issues and research needs. This will be accomplished first through discussions and interactions with Exelon and others with PBMR, HTGR and modular HTGR experience. An initial meeting was held with Exelon on January 31, 2001, at NRC-HQ to discuss the PBMR design, safety issues, and proposed Exelon schedule and approach for pre-application interactions related to technology assessment. Additional follow-

on meetings will be scheduled on an as-needed basis to discuss specific topics and issues. In parallel with interactions with Exelon, the staff will contact others with HTGR; and to the extent possible, modular HTGR; and PBMR-specific experience to obtain their insights and views on modular HTGR and PBMR-specific safety issues and technology. These contacts are discussed below and include international as well as domestic organizations.

The NRC has a number of agreements with foreign countries that provide a mechanism to cooperate on a wide variety of safety matters. Some of our foreign partners have HTGR experience and some also have currently operating modular HTGRs (which utilize Helium coolant and coated particle fuel designs). Specifically, Germany has had many years experience with small (~45 MWt) and large (~750 MWt) HTGRs, including those of pebble bed (i.e., coated particle/fuel sphere) design. Although the German HTGRs are no longer operating, their experience is relevant to the PBMR. Japan currently has an operating research HTGR (~30 MWt), although not of the pebble bed design. It does, however, utilize coated particle fuel and helium coolant and operates at high temperatures. China has recently begun initial startup of a small (~10 MWt) pebble bed research HTGR, from which experience should be obtained. In addition, they are developing a larger (200 MWt) modular pebble bed reactor design. The United Kingdom operates 14 advanced gas reactors (AGRs). Although they are different from modular HTGRs and the PBMR (e.g., the coolant is CO_2 and the fuel is not a coated particle design), they are graphite moderated and some experience may be relevant to modular HTGRs including the PBMR. Russia has had some HTGR development efforts in the past and is currently engaged in a joint effort with General Atomics (sponsored by DOE) to develop a modular HTGR (although not a pebble bed design) for plutonium (Pu) disposition. In addition, IAEA has some activities (in both the development and safety areas) looking at the design and safety of the PBMR. The NRC staff would also build upon and utilize their work in our activities. Finally, we would plan to discuss with the South African regulatory authorities their views on the PBMR design, safety issues, and research conducted (or to be conducted) to address the issues. In 2001, we would intend to arrange interactions with our international partners to discuss their experience with HTGRs and their views on safety issues.

Domestically, there remains some HTGR expertise, primarily at Los Alamos National Laboratory (LANL), Oak Ridge National Laboratory (ORNL) and General Atomics (GA). Preliminary discussions have been held with LANL and ORNL regarding the feasibility of drawing upon their

expertise. Relevant experience at the other DOE labs will also be determined. Access to expertise at GA may be limited because GA is an NRC licensee. In addition, for the past several years the Massachusetts Institute of Technology has had an effort to design a modular pebble bed HTGR. Their experience will also be sought. Finally, previous NRC experience with earlier generation HTGRs (e.g., Ft. St. Vrain and the NRC review of a DOE- sponsored modular HTGR in the late 1980s and early 1990s) would be utilized to help identify safety and technology issues, research needs, and approaches to their resolution.

Identification of Safety and Policy Issues

Modular HTGRs, such as the PBMR, involve characteristics that makes their approach to protecting public health and safety very different from reactor designs currently licensed in the United States. For example, among the four basic layers of defense-in-depth for ensuring public health and safety against potential adverse consequences -- prevention, protection, mitigation and emergency planning -- modular HTGRs typically result in a shift in emphasis from mitigation features to highly reliable protection features. That is, modular HTGRs aim to achieve high reliability and protection through the use of simple and passive decay heat removal and reactor shutdown processes as compared to high reliability through active standby engineered safety systems in LWR designs. Protection features are directed toward maintaining fuel integrity, even under very unlikely events. Mitigation is provided through different concepts for fission product containment and through long response times of the reactor in the event of an accident. These and other differences between modular HTGRs and current generation LWRs are expected to lead to a number of safety, technology and policy issues. Issues such as high temperature materials performance; the qualification of accident analysis codes and methods; the qualification and performance of the coated particle/fuel spheres, the siting source terms, and the range of events that must be used for design and siting purposes, are expected to be among a range of key safety, technology and policy issues that will need to be assessed.

Technology Assessment, Infrastructure and Contractor Support

Along with the identification of key technical safety, and policy issues associated with modular HTGRs, including the PBMR, the staff will also identify the technology assessment infrastructure needs to be ready to review an actual application. This will include needed in-house and

contractor expertise, analytical tools, and the resources to obtain them. It is expected that the expertise needs will be in areas unique to modular HTGR technology and include:

- fuel design, fabrication and performance
- high-temperature materials performance
- helium turbine technology
- accident analysis
- modular HTGR risk analysis

A complete identification of infrastructure needs is, to some extent, dependent upon the identification and nature of the safety issues. However, in regard to analytical tools, it is important for the agency to have an independent capability to calculate the plant response to accidents, particularly those related to loss of coolant, decay heat removal, and reactivity insertion. Such independent capability is valuable in providing a deeper understanding of plant behavior under a wide range of off-normal conditions, which can result in insights that contribute to the quality and thoroughness of the staff review and determine confidence in information provided by the applicant. Independent analyses have, in the past, led to the identification of significant advanced reactor safety issues that may otherwise have gone undetected (e.g., AP-600 fourth stage depressurization valve under-sizing). Currently, NRC does not maintain any analytical tools, data bases, or activities on HTGRs or modular HTGRs. The most recent efforts in this regard were approximately 10 years ago when the agency had under way a pre-application review of a DOE-sponsored modular HTGR (MHTGR) design in accordance with the Commission's Advanced Reactor Policy Statement.

A draft pre-application safety evaluation on the MHTGR was issued in 1989 for comment (NUREG-1338); however, although a final NUREG was prepared in the early 1990s, it was never issued because DOE canceled the program. In developing NUREG-1338, the staff utilized contractor support and analytical tools from Oak Ridge National Laboratory (ORNL) and Brookhaven National Laboratory (BNL). Since that time, ORNL has remained active in the HTGR field and currently supports DOE-sponsored work on HTGRs for Pu disposition. Accordingly there is expertise at ORNL (including analytical tools) that the agency could draw upon in the pre-application phase to assist the staff in the identification of issues and approaches for the PBMR review, as well as getting the staff familiar with the available analytical tools, their basis, and how

to use them. In this regard, ORNL has available the GRSAC code (a three-dimensional thermal-hydraulic code with point kinetics reactor physics) that they are using in assisting DOE; this is an improved version of a code used in the staff's review of the DOE modular HTGR ten years ago. Other expertise and codes are also available and would be reviewed for their applicability and possible use.

Staff Training, Schedule and Resources

One outcome of the technology assessment and transfer work would be the development of a small nucleus of staff familiar with modular HTGR technology and the unique attributes of the PBMR such that they can participate and facilitate an actual application review, if and when an actual application is received. This nucleus would include staff from RES, NRR, and NMSS.

To help achieve this outcome, development and implementation of a training program will also be included in the technology assessment and transfer work. The training program will consist of information on basic modular HTGR design, technology, safety features, operation, and experience. Contractor assistance will be used to develop and give the training, which will be targeted to be available in approximately 1 year.

Approach to Licensing

Exelon has proposed an approach to licensing the PBMR in the United States. The approach includes building a single module in the United States under the combined license provision of 10 CFR Part 52 and, based upon that experience and the results of a test program using a prototype module in South Africa, subsequently certifying the design. Licensing and certification of a PBMR design may raise many process questions regarding issues such as:

- with fuel quality an integral part of the safety case, should the fuel fabrication be tied to the design certification?
- is an application required for each module?
- is a decommissioning trust fund required for each module?

Early interaction to identify and address such issues with Exelon would be part of the plan.

Regulatory Requirements and Policy Issues

An important output from the pre-application interactions with Exelon will be the identification of applicable requirements and policy issues. This will involve looking at the requirements in 10 CFR (and their supporting regulatory guides) and identifying those that are unique to LWRs (and thus not applicable to the PBMR), as well as by looking at the PBMR design and the technology and safety issues and identifying unique aspects that are not covered by current requirements.

The interactions with Exelon and our foreign partners, the domestic experience described above as well as the experience with the Ft. St. Vrain reactor, the review of a DOE-sponsored modular HTGR in the late 1980s, and the ALWR reviews would be utilized in reviewing the applicability of the requirements and in identifying unique issues associated with the PBMR.

Identification of Safety and Regulatory Policy Issues

It is expected that the technology, safety and regulatory assessments will lead to the identification of certain regulatory and safety policy issues that would need to be resolved in order to proceed with an actual licensing review. It is likely that the regulatory requirement issues that stem from the safety and technology issues will include:

- how to ensure fuel quality over the life of the plant
- acceptability of the use of fuel enrichments greater than 5%
- what accidents should the plant be designed for?
- containment vs. confinement
- an acceptable approach to the source term
- control room design and staffing
- extent of necessary prototype testing
- reduced emergency planning zone.

Policy issues would be provided to the Commission for guidance. A combination of traditional engineering and a risk-informed approach to addressing the issues would be utilized.

Coordination, Resources and Schedule

It is expected such safety and policy issues could be developed and provided to the Commission in approximately 18 months. Although RES would have the lead, this effort would involve close coordination with NRR and NMSS. The staff will also interact with ACRS and other stakeholders. As an interim step, a preliminary set of the key safety and research issues associated with modular HTGRs including the PBMR would be provided to the Commission for information in approximately 9 months.

The pre-application activities will be a joint RES/NRR/NMSS effort with RES having the overall lead. Interoffice coordination and responsibilities would include:

- RES Role (overall lead for project)
  - organize, conduct, and document meetings
  - organize and participate in ACRS presentations and stakeholder workshop
  - draft SECY papers, letter reports to DOE and letters to Exelon
  - preliminary identification of issues, research needs, applicable requirements, etc.

- NRR Role (overall lead for process issues related to the actual application)
  - participate with RES on preparing papers and participate in meetings, giving presentations and identifying technical issues
  - concur on all correspondence to Exelon, DOE, ACRS, EDO, or the Commission

- NMSS Role (overall lead for fuel fabrication, transportation, waste and safeguards issues)
  - participate with RES on team preparing papers and participate in meetings, giving presentations, and identifying technical issues
  - concur on correspondence to Exelon, DOE, ACNW, EDO, or the Commission involving fuel fabrication, transportation, waste or safeguards issues

- OGC Role (overall advice on legal matters)

NRC staff work would focus on the review of applicable requirements and the identification of important accident scenarios, infrastructure, research, and resource needs. Contractor work

would focus on review of modular HTGR analytical tools, training, and engineering analysis support.

A schedule for the activities described above is shown in the attached figure. It is recognized that this schedule is dependent upon many factors, however, it represents the approximate time (18 months) necessary to accomplish the pre-application activities.

To accomplish the pre-application activities, it is expected that approximately 7 FTE will be necessary over the 18 month period. This will include four FTE in RES, two in NRR and one in NMSS. Also, it is estimated that $1000K will be needed over the 18-month period for contractor support in providing training, reviewing analytical tools and providing calculational assistance to the staff. DOE funds to cover the technology assessment and transfer activities are estimated to amount to $800K and 3 FTE over the 18-month period. Exelon fees under 10 CFR 170.21 would cover regulatory process and framework assessment and PBMR-specific technology assessment activities and would amount to an estimated $200K and 4 FTE over the 18-month period.

Preliminary Schedule for

PBMR Preparatory Activities

(in months)

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24

Technology Assessment and Transfer

- Interactions with:
  - Exelon
  - Foreign Partners
  - Domestic Organizations
- Assessment of:
  - safety and research issues — ACRS — Information SECY on safety and research issues
- Development of Infrastructure:
  - analytical tools
  - contractor support
  - staff training

Regulatory Process and Framework Assessment

- Assessment of:
  - Exelon proposed approach to licensing
  - applicable requirements
  - policy issues and approach for review — Public workshop — ACRS — SECY on policy issues and approach for review