



U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation

NRR REVIEW STANDARD

Change Notice

Review Standard No.: **RS-002**

Review Standard Title: **Processing Applications for Early Site Permits:
Draft for Interim Use and Public Comment
December 23, 2002 (with additional sections released
on April 13, 2003)**

Effective Date:

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Responsible Organization: **NRR/NRLPO**

Summary of Changes: This is the initial issuance of RS-002, "Processing Applications for Early Site Permits." The objective of this review standard is to ensure that staff reviews of applications for early site permits (ESPs) and the associated environmental reports are effective, efficient, and consistent; and that the reviews result in high-quality products.

Training: **None**

ADAMS Accession No.: **ML032170007**

NRR REVIEW STANDARD

RS-002

Processing Applications for Early Site Permits

1.0 PURPOSE

This review standard (RS)

- (1) describes the process for reviewing an early site permit (ESP) application and provides guidance for completing the steps in the process (see Sections 4.1 through 4.3 below and Attachment 1),
- (2) provides detailed guidance for review for ESP applications and provides references to review criteria for areas within the scope of the review (see Section 4.4 below and Attachments 2 and 3),
- (3) provides a sample safety evaluation to be used by the NRC staff as guidance for documenting the results of ESP application reviews (see Section 4.5 below and Attachment 4), and
- (4) provides references to inspection guidance that supports the staff's determinations on ESPs (see Section 4.6 below).

The goal of an RS is to ensure that the staff's reviews of licensing actions are conducted in an effective, efficient, and consistent manner; and that the reviews result in high-quality products. The RS addresses the NRC's performance goals as specified in NUREG-1614, the NRC's Strategic Plan, in a number of ways.

Maintain safety, protect the environment, and promote the common defense and security. In the process of developing the ESP RS, the staff has carefully evaluated what information is needed from an applicant, and what the staff's evaluation must address to support issuance of an ESP. This process therefore helps ensure that the staff's review of an ESP application will be comprehensive in addressing applicable requirements.

Increase public confidence. By making the staff's review standards visible to all stakeholders, the ESP RS contributes to increasing public confidence in the regulatory process.

Make NRC activities and decisions more effective, efficient, and realistic. The ESP RS makes maximum feasible use of existing NRC guidance. The issuance of the guidance in the RS will help ensure that the staff's review of future ESP applications is effective

and efficient by consolidating all necessary guidance for staff review of an ESP in one document.

Reduce unnecessary regulatory burden on stakeholders. To the extent feasible, the ESP RS clearly defines guidance and acceptance criteria for the staff to use to support a Commission determination on whether or not an ESP should be issued. Therefore, the ESP RS reduces unnecessary regulatory burden on potential applicants for an ESP by providing, in one place, guidance and references for the applicant to use to determine the information to be provided in the ESP application.

2.0 BACKGROUND

As discussed in the Statements of Consideration for Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52 (54 FR 15372), the purpose of the ESP regulations in Part 52 is, in part, to make it possible to resolve safety and environmental issues related to siting before an applicant must make large commitments of resources. Part 52 of Title 10 describes the ESP as a “partial construction permit.” The applicant for a combined license (COL) for a nuclear power plant or plants to be located at the site for which an ESP is issued can reference the approved site, thus obviating the need for extensive review of siting issues at that stage of the licensing process.

The ESP application is required to address site safety, environmental issues, and emergency planning. If the applicant desires to perform limited site work after issuance of the ESP, the ESP application must also include a redress plan for the possibility that a nuclear power plant is never actually constructed on the approved site. Pursuant to 10 CFR 52.17(a)(2), consideration of the need for power, as part of the applicant’s environmental report (ER), is not required at the ESP stage.

Once an ESP application is submitted, the NRC staff is required to review the ESP application in the three areas of site safety, environmental impacts, and emergency planning. The purpose of the review is to determine whether the application meets NRC regulations and the requirements of the Atomic Energy Act. The staff’s safety evaluation report (SER) will reach conclusions regarding whether there is reasonable assurance that the site can safely host a future nuclear power plant or plants. In addition, the SER will contain a determination regarding emergency planning based on the level of detail in the emergency planning information provided by the applicant. If the information submitted by the applicant under 10 CFR 52.17(b) is relatively limited, the staff’s finding on emergency planning will focus on whether there are significant impediments to the development of emergency plans. If major features of the emergency plans are submitted, the staff will make a determination regarding the adequacy of those features. Finally, if complete emergency plans are submitted, the staff will determine whether these plans provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. The staff will also develop an environmental impact statement (EIS) in accordance with the National Environmental Policy Act and 10 CFR Part 51 to determine and evaluate environmental impacts of the potential use of the proposed site to host a nuclear power plant or plants.

This RS provides guidance on the staff's process for reviewing an ESP application. Detailed process guidance is provided for the development of the SER. The RS also provides specific technical and format guidance for the development of the SER (including emergency planning aspects), and it notes what staff guidance is applicable to the review of the ER and development of the EIS.

3.0 APPLICABILITY

This RS is applicable to ESPs.

4.0 USE OF THIS REVIEW STANDARD

This section provides guidance for use of this document and other documents in processing an ESP application.

4.1 Process Description

Attachment 1 provides a process flow chart that identifies each major step involved in the processing an ESP application.

- (1) The staff should follow the process outlined in Attachment 1 and this section for processing ESP applications. Specific guidance for each step is provided below. The lead project manager for the ESP review is responsible for coordinating the staff's review following the process described in this section and illustrated in Attachment 1.
- (2) Steps in the ESP Review Process
 - (a) The New Reactor Licensing Project Office (NRLPO) will designate a project manager (PM) for each ESP application submitted or expected to be submitted. Attachment 2 lists applicable sections of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," that are to be addressed in the staff's SER, and it also lists the primary and secondary NRC technical branches responsible for performing the review of each topic. The PM will be responsible for coordinating the work of the NRC technical branches identified in Attachment 2. He/she will also be responsible for coordinating with the environmental project manager (EPM), whose responsibilities are defined in step (b) below, to ensure that (1) the schedules for development of the SER and the EIS are coordinated, and (2) the two documents are appropriately consistent. The PM will accomplish the following:
 - Ensure that he/she is notified by the applicant when the applicant submits the ESP to the Director of Nuclear Reactor Regulation (NRR) in accordance with 10 CFR 2.101(a).

- Provide guidance and training to the involved technical branches and other involved staff on the process and schedule for the acceptance review of an ESP application.
 - Verify, in accordance with 10 CFR 2.101(a)(2), that a copy of the tendered application is made available for public inspection at the NRC Web site and at the NRC Public Document Room.
 - In consultation with the NRR Work Planning Center, obtain and notify the involved technical branches of the technical assignment control (TAC) number(s) for the ESP review.
 - Promptly notify the Office of the General Counsel (OGC) of receipt of the ESP application, and ensure that OGC is appropriately involved throughout the ESP review.
 - Ensure that proprietary information submitted in conjunction with the ESP application is handled as required by 10 CFR 2.790 and NRR Office Instruction LIC-204, "Handling Requests to Withhold Proprietary Information from Public Disclosure."
- (b) The License Renewal and Environmental Impacts Branch (RLEP) will designate an EPM to coordinate review of the ER submitted by the applicant and to coordinate development of the NRC's EIS. Attachment 3 lists applicable sections of NUREG-1555, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants," that are to be addressed in the staff's EIS and the primary and secondary NRC technical branches responsible for performing the review of each topic. Attachment 3 also provides clarifications (where appropriate) to the guidance of NUREG-1555 that the staff will consider while reviewing the ESP application. The EPM will coordinate the acceptance review of the ESP application with the PM as discussed in step (c) below. The EPM will also coordinate with the PM to ensure that (1) the schedules for development of the SER and the EIS are coordinated, and (2) the two documents are consistent, recognizing the differences in review criteria and methodology. Finally, the EPM will coordinate the review of the site redress plan (if submitted by the applicant) to support a decision, in accordance with 10 CFR 52.25(a), regarding whether to authorize the limited work allowed by 10 CFR 50.10(e)(1).
- (c) The PM and EPM will coordinate the determination of whether the application is complete and acceptable for docketing. Paragraph (2) of 10 CFR 2.101(a) generally requires that this determination be made within 30 days of receipt of the application. The PM and EPM will provide copies of the safety assessment, emergency planning information, and the ER to the primary review branches designated in Attachments 2 and 3. These branches will, within the time frame specified by the PM, provide a memorandum to NRLPO (for the safety assessment and emergency planning information) or to RLEP (for the ER) with a conclusion as to whether the information provided for their

sections of the ESP review is sufficiently complete and acceptable to support docketing. The criterion for such determination is that sufficient information is provided to allow the staff to perform the reviews of the sections of the application assigned to their respective branches in accordance with the standard review plans and other guidance contained or referenced in Attachments 2 and 3 to this RS. It is possible that the staff will develop requests for additional information (RAIs) in each review area. The acceptance review represents a determination of whether the safety case and the evaluation of the environmental impacts presented in the application are reasonably clear and well supported, such that detailed review and development of an RAI (as needed) are feasible. Therefore, the criterion for the acceptance review is not that the application is complete in all respects such that no additional information will be needed, nor is the criterion that it must be acceptable for issuance of an ESP. Rather, the application must be nearly complete. Upon receipt of all inputs from the technical staff, the PM, with input from the EPM, will prepare a letter from the Director of NRR notifying the applicant that the application is accepted for docketing or is rejected; if the application is rejected, the letter must explain why. The PM will ensure concurrence is obtained and the letter mailed to meet the 30-day requirement of 10 CFR 2.101.

- (d) If the staff determines that the application is sufficiently complete to perform a detailed review, the PM will verify that the applicant has provided the number of copies required by 10 CFR 2.101 to local and state officials. The PM will then docket the application.
- (e) In consultation with the NRR Work Planning Center, the PM will develop a schedule for review of the ESP application and will provide the schedule to the involved technical branches and other involved NRC staff.
- (f) Without necessarily repeating training provided in accordance with step (a) above, the PM will provide training and guidance on the process for review of the safety assessment and development of the SER to involved technical staff and other involved NRC staff.
- (g) The PM will make a public notification in the *Federal Register* of the docketing of the ESP application. In addition, the Secretary of the Commission will issue a Notice of Hearing as soon as practicable after the application is docketed. The Notice of Hearing may set a date for the initial hearing (at least 30 days after issuance of the notice), or the date may be set in a subsequent notice. Given the likely duration of an ESP review, it is unlikely that the hearing date will be established in time to be included in the initial notification. Section 4.2 of this RS further discusses the hearing process.
- (h) In accordance with Section 2.3 of NRR Office Instruction LIC-101, "License Amendment Review Procedures," the PM will determine whether there are any appropriate precedents for the review of an ESP application. If any are

found, the PM will ensure the technical branches involved in the review are aware of the precedents and that the precedents are considered in the review of the ESP application. Technical staff may also identify precedents and should discuss any found with the PM as the technical branch finding the precedent deems appropriate.

- (i) In consultation with the NRR Work Planning Center, the PM will develop a work plan for processing the safety evaluation, using a similar approach to that specified in Section 2.4 of LIC-101. The plan will define the scope of the review, resources needed for the review, and the schedule for completion of the review. The work plan will be coordinated with technical branches involved in the review. The PM will submit work requests to the appropriate technical branches in accordance with Section 2.5 of LIC-101.
- (j) Technical branches will perform technical reviews of sections of the safety assessment within their purview, using the guidance of sections of NUREG-0800 that are indicated as applicable to the ESP review in Attachment 2 to this RS. For those cases in which NUREG-0800 sections are marked up and appended to Attachment 2, the staff will use the markups as guidance rather than the original NUREG-0800 text. The technical branches will also consider the guidance documents that are referenced in the applicable sections of NUREG-0800 (or in markups appended to Attachment 2 of this RS, if provided), and other guidance determined by the staff to be applicable as shown in Attachment 2 to this RS. The staff will develop RAIs for assigned sections if additional information is needed to support the conclusions needed for the corresponding sections of the safety evaluation (SE). Section 4.3 of LIC-101 provides additional guidance on determining whether RAIs are necessary and appropriate. Technical branches will develop RAIs where needed and provide them to the PM. The PM will compile the RAIs, work with the submitting branch to ensure that they are clear and have an appropriate regulatory basis, coordinate with OGC for issues within the scope of the hearing, and develop an RAI package in accordance with LIC-101. If necessary (e.g., to verify whether the RAI package contains proprietary information), the PM may provide the RAI package to the applicant informally, in accordance with NRR Office Instruction COM-203, "Informal Interfacing and Exchange of Information with Licensees and Applicants." The PM will provide the RAI package to the applicant formally by letter or letters. Once the applicant responds to the RAIs, the PM will coordinate review of the responses by the cognizant technical branches.
- (k) Assigned technical branches will develop SEs of assigned parts of the application, ensuring that requirements of 10 CFR Part 52 and other applicable regulations are met, and using the guidance of applicable sections of NUREG-0800 (or in markups appended to Attachment 2 of this RS, if provided), guidance documents referenced in applicable sections of NUREG-0800 (or referenced in markups appended to Attachment 2 of this RS, if provided), and other guidance determined by the staff to be applicable

as shown in Attachment 2 to this RS. The SE must also summarize the RAIs developed by the staff (if any) and the applicant's responses to the RAIs. If necessary, the draft SE may contain open items that remain to be addressed by the applicant. As required by Section 4.5 of LIC-101, the SEs must include or reference docketed information substantively relied upon by the staff in making its findings. The regulatory evaluation section will provide the regulatory framework for the licensing action. This section will provide a summary of the relevant regulations, regulatory guides, generic letters, or other criteria the staff will use in reviewing the application. Attachment 4 to this RS provides sample SE text for some sections of the SER, and the general format shown therein applies to all sections of the SER. Technical branches will use the general format specified in Attachment 4 unless agreed otherwise by the PM, in consultation with OGC, during the work planning process. Each technical branch developing an SE will work with the PM and with other technical branches (including secondary review branches as designated in Attachment 2) as needed during development to help ensure that the product submitted is consistent and complete.

- (l) NRLPO will provide guidance to the NRC's inspection staff on expected areas for inspection in support of the staff's review of an ESP application. In addition, the PM will request recommendations from the technical branches during development of the SER regarding areas that the NRC's inspection staff should inspect. The PM will compile inputs received and provide them to the inspection staff. When the draft SER is complete, the PM will also provide a copy of that document to the inspection staff. Additional information and references for the inspection process are provided in Section 4.6 of this RS.
- (m) After the branches prepare the SEs, the branch-approved SEs will be provided to the PM, who will compile the inputs into a single integrated SER. The PM will submit the draft SER for technical editing and will incorporate the technical edits where appropriate. If substantive changes are made to the SER, affected technical branches will be asked to reconcur. The completed SER will then be subjected to a review and concurrence process to verify the quality and consistency of the SEs. If the PM makes substantive changes to any SE input, he/she will notify the providing branch as soon as possible to minimize delays in concurrence caused by disagreements between the PM and technical branches. All technical branches that provided input to the SER will be on concurrence.
- (n) The PM will obtain concurrence from OGC, whose review will ensure the SER is defensible and complete from a legal perspective, and that counsel has no legal objection to the document.
- (o) As authorized by NRR Office Instruction ADM-200, "Delegation of Signature Authority," the Director, New Reactor Licensing Project Office, will approve the draft SER unless another official is designated during work planning for the ESP review.

- (p) If necessary (e.g., to determine whether the SER contains proprietary information), the PM may provide the SER to the applicant informally, in accordance with COM-203. The PM will provide the SER to the applicant formally by letter. The draft SER will be issued as a draft NUREG document. The PM will provide a copy of the draft SER to the ACRS for its review. (See Section 4.3 of this RS for additional information on the ACRS review.)
- (q) If the draft SER contains open items, the applicant will respond to the open items and the staff, in turn, will review the responses. The resolution of the open items will be described in the final SER. The final SER will be developed in a manner similar to the process just discussed for the draft SER. The staff will revise the draft SER and, after approval of the revised document, will issue it as the final SER. The final SER will be issued as a NUREG document.
- (r) After the environmental review [discussed in more detail in step (b) of this section] is completed, the hearing (discussed in more detail in Section 4.2) is conducted, and the ACRS report (discussed in more detail in Section 4.3) is submitted to the Commission, the Commission will determine whether the ESP application meets applicable standards and requirements of the Atomic Energy Act and the Commission's regulations. The Commission will also determine whether required notifications have been made to other agencies or bodies. If these requirements have been met, the Commission will issue the ESP in accordance with 10 CFR 52.24, with conditions and limitations as the Commission deems appropriate and necessary.

4.2 Public Hearings

OGC is primarily responsible for coordinating the activities associated with the hearing process, with technical support from the staff. The process is governed by Subpart G of 10 CFR Part 2. For the ESP, a hearing is required. The process begins with public notification of the hearing. The Commission may select one or more of its members, an atomic safety and licensing board (ASLB), or a named officer to preside over the proceeding. If the Commission does not so provide, the chairman of the Atomic Safety and Licensing Board Panel will designate an ASLB or an administrative law judge to preside over the proceeding.

Pursuant to 10 CFR 2.714, any person whose interest may be affected by a proceeding may file a written petition for leave to intervene within the time provided in the notice of hearing, or the time otherwise specified by the Commission, the presiding officer, or the ASLB. Before the first prehearing conference, such a petitioner must file a supplement to the petition that must include a list of contentions that the petitioner seeks to have litigated in the hearing. A petitioner will not be admitted as a party to the proceeding unless the petitioner submits at least one contention meeting the standards of 10 CFR 2.714. The ASLB or presiding officer rules on each petitioner's standing and the admissibility of the contentions, and any petitioner who is denied intervention may appeal to the Commission. In a contested proceeding (i.e., one in which intervention is

granted), discovery is conducted against the applicant and admitted intervenors. This phase of the hearing process occurs early during the staff's review of the application.

Once the staff has completed the SER and the EIS, the process of preparing for and conducting the hearing begins. Late-filed contentions based on the SER and EIS may be filed. In a contested proceeding, discovery is now conducted against the staff, and motions for summary disposition may be filed. The parties prepare pre-filed testimony on the contentions remaining in issue. The presiding officer or ASLB then presides over the hearings. In an uncontested proceeding, the presiding officer or ASLB will consider the issues specified in 10 CFR 2.104(b)(2) and (3).

Upon conclusion of the hearings, all parties file proposed findings and reply findings. The ASLB or administrative law judge then issues its initial decision. Petitions for Commission review of the decision may be filed. The Commission then makes a decision on the ASLB/administrative law judge decision and decides whether to issue the ESP.

4.3 ACRS Review

As required by 10 CFR Part 52, the PM will provide a copy of the ESP application to the ACRS after the ESP application is accepted for review. The PM will also provide the completed draft SER (with open items, if applicable) to the Committee for its review. The PM will, soon after receipt of the ESP application, discuss the schedule for the Committee's review with the ACRS staff to ensure that Committee resources are available when needed for the review. The PM will also discuss with the ACRS the staff's plans for presentations to the Committee on the ESP application and the results of the staff's review of the application. The Committee will report to the Commission on those portions of the application that concern safety. The staff will include the ACRS report in the final SER, along with the staff's responses to the Committee's comments and recommendations.

4.4 Review Criteria

Attachments 2 and 3 identify areas to be reviewed for the SER and the EIS, respectively, and the primary and secondary NRC review branches for each area. The attachments are organized by NRC technical branch for ease of use. Primary review branch reviewers will:

- (1) Review the areas of the site safety assessment or environmental report identified in the matrices in Attachments 2 and 3, respectively, that fall within the purview of their branches. The column labeled "Primary Review Branch" identifies the branch responsible for review and development of an SE or for the review of the environmental impacts for a given area, while that labeled "Secondary Review Branch" identifies review areas in which that branch contributes to an SE or EIS section to be developed by another branch.
- (2) Refer to the guidance documents listed in the SRP Section and Comment/ Additional Guidance columns of Attachments 2 and 3 for guidance on what to

consider when conducting the review. For cases in which a markup of a guidance document is appended to Attachment 2, use the markup instead of the text in the guidance document from which the markup was made (NUREG-0800).¹ For recently revised SRP sections, for which markups are not attached, references to “the plant” will be deemed to refer to “a nuclear power plant or plants of specified type that might be constructed on the proposed site.”²

- (3) Coordinate with reviewers of other branches, as necessary, to ensure that important aspects of a review area are adequately covered during the review.
- (4) Document the results of their reviews (including all necessary inputs from other review branches) for the areas within the purview of their branch.
- (5) Ensure that the reviews are conducted consistent with the review guidance and criteria contained in the guidance documents identified in Attachments 2 and 3 and that any deviations are approved by the appropriate branch chief and communicated with the PM or EPM, as applicable. It should be noted that the sample evaluation findings in each NUREG-0800 section, including those marked up and attached to this RS, use language appropriate for the case in which the applicant has met the acceptance criteria in the section. Should the staff make the determination for a given section that one or more of the acceptance criteria have not been met, the actual findings for that section will need to describe how each criterion has been met or not met.

4.5 Documentation of Review (SER)

Attachment 4 contains a sample SER template for use in reviewing a safety assessment for an ESP application and developing the resulting SER. Reviewers will do the following:

- (1) Adapt or revise the text in the sample SER to capture site-specific information, and/or add text as needed, using available references, particularly NUREG-0800 (as marked up and appended to Attachment 2 to this RS, if applicable).

¹In cases where references or items in numbered lists have been struck out to show inapplicability for the ESP review, there has been no attempt for this draft document to renumber the following references or items. This is consistent with the staff’s intent that these markups do not constitute revisions to NUREG-0800, and that they only provide interim guidance for review of the ESP. Renumbering will be performed as appropriate during development of the final version of RS-002.

²As of the publication date of this draft document, the NRC staff is considering the possibility of an applicant providing a “plant parameter envelope” (PPE) in support of an ESP application in lieu of design information for a specific nuclear power plant design or reactor type. Should the NRC determine this approach is acceptable, guidance to the staff on review of an application that includes a PPE will be provided in the final version of this document.

- (2) Develop the regulatory evaluation section in the SE for assigned areas of review as appropriate for the licensing basis of the site under review, using the guidance of Attachment 4 to this RS and Section 4.5 of LIC-101.
- (3) Summarize their technical review and findings in the technical evaluation sections of the SE for assigned review areas as discussed in Section 4.5 of LIC-101.
- (4) Review the conclusions sections of the sample SE, as well as the Evaluation Findings subsection in applicable sections of NUREG-0800 (as marked up and appended to Attachment 2 of this RS, if applicable), for guidance on documenting conclusions reached as a result of the review.
- (5) Recognize that section headings for the SER are intended to closely adhere to the organization of NUREG-0800. Because many parts of NUREG-0800 are inapplicable for the ESP stage, many unused heading numbers will be retained in the SER. NRLPO will indicate in the SER why these sections are inapplicable.
- (6) Provide evaluations (including a regulatory evaluation, technical evaluation, and conclusion section) related to areas not covered by the Attachment 2 if required. Intent to provide such additional evaluations must be discussed early in the review process with NRLPO. (This guidance is intended to cover cases for which, on a site-specific basis, it is determined that additional sections are required to appropriately cover the applicant's request and to ensure that the site-specific SE adequately addresses the staff's review effort related to the site-specific application.)
- (7) Identify areas (e.g., confirmatory items) for which inspection by the NRC's inspection staff is recommended.

4.6 Inspection Guidance

The Inspection Manual Chapter (IMC) 2500 series describes the inspection process for the construction of nuclear power reactors through the startup and operations phase. IMC 2501 describes the early site permit phase of reactor licensing under the 10 CFR Part 52 regulatory process. It provides guidance for inspectors to use in conducting inspections during the pre-application and post-application phase in support of the hearing required by 10 CFR 2.102. Subsequent manual chapters provide specific guidance to inspectors on what to inspect during the various phases of construction of nuclear power plants.

5.0 PRIMARY CONTACT

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6.0 RESPONSIBLE ORGANIZATION

NRR/NRLPO

7.0 EFFECTIVE DATE**8.0 REFERENCES**

- (1) 54 FR 15372, 10 CFR Part 52, "Early Site Permits, Design Certifications, and Combined Licenses for Nuclear Power Plants"
- (2) NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants"
- (3) NUREG-1555, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants"
- (4) NRR Office Instruction LIC-101, "License Amendment Review Procedures"
- (5) NRR Office Instruction COM-203, "Informal Interfacing and Exchange of Information with Licensees and Applicants"
- (6) NRR Office Instruction LIC-204, "Handling Requests to Withhold Proprietary Information from Public Disclosure"
- (7) NRR Office Instruction ADM-200, "Delegation of Signature Authority"
- (8) NRC Inspection Manual Chapter 2501, "Nuclear Reactor Inspection Program, Early Site Permit"