

**LICENSE APPLICATION REVIEW STRATEGY
(LARS) RECOMMENDATION REPORT
OUTLINE**

1.0 INTRODUCTION AND PURPOSE

The purpose of the License Application Review Strategy (LARS) Recommendation Report is to recommend to the NRC Staff approaches to develop a LARS and to provide information for use in implementing LARS and the License Application Review Plan (LARP). The purpose of reviewing the license is to identify and resolve potential licensing issues.

2.0 BACKGROUND AND HISTORY

- 2.1 An overview of past licensing reviews resulting in Safety Evaluation Reports (SER) at NRC will be discussed. Emphasis will be on applicable lessons learned and important differences between reactor and repository licensing reviews that can be applied in the conduct of the High-Level Nuclear Waste (HLW) repository review.
- 2.2 An overview of the statutes and regulations related to the review process will be presented with specific mention of the Licensing Support System and its role in the review process.
- 2.3 A summary recognizing NRC/HLW reviews completed and in progress and their relationship to LARS.

3.0 RATIONALE FOR DEVELOPMENT OF LARS

- 3.1 A meeting on August 21-22, 1990, established the approach and key concepts of LARS.
- 3.2 Ideas regarding LARS were brought forth at the staff interviews which have been conducted and in continuing dialogues with the NRC Staff. (Appendix C: Results of Interviews.)
- 3.3 Unique aspects of the Repository require special considerations in conducting reviews during both the pre- and post-licensing application period. These are sufficiency, performance confirmation, three year time frame, LSS, treatment of National Environmental Protection Act (NEPA) and unusual nature of uncertainties.
- 3.4 The LARS should provide a cohesive strategy for development of the Safety Evaluation Report and its review by other entities such as the ACNW and commission staff.
- 3.5 The methods for conducting reviews and the consequences of selectivity are important considerations.

4.0 LARS ROLE WITH OTHER NRC ACTIVITIES

- 4.1 Importance of LARS as a primary NRC review policy that uses all review tools and capabilities that are available.
- 4.2 Role of Format and Content Guide.
- 4.3 Role of Regulatory Strategy.
- 4.4 Use of Systematic Regulatory Analyses.
- 4.5 Use of Iterative Performance Assessment and Confirmatory Research.
- 4.6 Guidance from the NRC Five-Year Plan.
- 4.7 Current on-going NRC reviews.
- 4.8 Role of LARP.

5.0 REVIEW OBJECTIVES AND APPROACH

- 5.1 Review Objectives which will include: Pre-License Application Review, Draft Environmental Impact Statement (DEIS), DOE plan adequacy and capability, DOE issue resolution, sufficiency of site, etc. License Application Review - (Compliance, characterization, and capabilities).
- 5.2 Review in two phases; Pre-Licensing Application and License Application.
- 5.3 Components of review focusing on QA, interactions with DOE on format and content, DOE processes, products and plans.
- 5.4 Development of LARP using developed review tools and capabilities and the implementation of the LARS.
- 5.5 Use of focused review techniques at varying levels and methods of review and screening procedures in order to provide alternatives.
- 5.6 Role in technical review of parties other than DOE having technical observations (State, Local Government Entities, Indian Tribes).

6.0 ALTERNATIVES AND APPROACHES TO LARP DEVELOPMENT

- 6.1 Discussion of issues, options, constraints, and opportunities as developed for analysis of regulations as to range, depth and diversity of review.
- 6.2 Discussion of and rationale for criteria to be employed in determination of methods, their application and the future relationship of iterative performance assessment. Discussion of the performance objectives of 10 CFR Part 60 and their relative importance. Discussion of the flexibility of recommended criteria to respond to program changes.

6.3 The development of alternative review strategies based on stated criteria, options and methods available. Discussion of pros and cons of this approach in developing the LARP. Methodology to be used in developing alternative review strategies to meet the review objectives.

7.0 RECOMMENDATIONS

- 7.1 Programmatic recommendations for the development of LARS and LARP.
- 7.2 Rationale for the selection of the preferred alternatives.
- 7.3 Any other recommendations.

APPENDIXES

- A. References
- B. Glossary
- C. Results of Interviews with NRC and CNWRA staff to discuss LARS