Spent Fuel Project Office Licensing Process Conference

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Session 3 Discussion Topics

- What can be done to improve the planning efforts prior to submittal of your licensing actions?
- Is NRC's Part 71 and Part 72 licensing process responsive to the needs of applicants and completed in a timely manner? What can be done to improve it?
- What different approaches or techniques would you suggest be used regarding resolution of licensing and technical issues?
- Is there confusion concerning proprietary submittals? How can we best get that information to you (e.g., additional guidance)?
- What additional information relating to the Part 71 and Part 72 licensing process should be posted on the NRC Web site? Can you find all the NRC documents related to Part 71 and Part 72 licensing easily on the NRC Web site?

Session 2 Suggestions

1. What can be done to improve the planning efforts prior to submittal of your licensing actions?

- *Electronic submittal of documents*
- Informal phone conversations
- Pre-application meetings (particularly for novel approaches)
- FSAR markups by applicants

Session 2 Suggestions

2. Is NRC's Part 71 and Part 72 licensing process responsive to the needs of applicants and completed in a timely manner? What can be done to improve it?

- RAI's – Tie them to the objective NRC is trying to meet
- Allow overlap of certificate revisions
- *Use Part 50 Appendix B approach to QA changes*
- Rapid acknowledgement of request as registered users
- More feedback after application is submitted, i.e. before RAI or certificate.
- Better coordination between NRR and SFPO

Session 2 Suggestions

2. Question 2 (continued)

- Meetings on RAI need to be considered in overall schedule
- *Lay out schedule for important components of* review schedule, not just start and finish
- RAI's –
  - Bound what's in and what's out
  - Do we really need more data??
  - *Bound reviewers preference for codes*
  - One methodology
  - Risk-inform reviews
- Inconsistency between SAR, reg guide and SRP

Session 2 Suggestions

2. Question 2 (continued)

- Confusing interface between ISG and SRP
- Clarification on SAR methods approval
- *Partial RAI's may be appropriate*

Session 2 Suggestions

3. What different approaches or techniques would you suggest be used regarding resolution of licensing and technical issues?

- Speed up the NRC review and approval process
- Take credit for foreign design approval (Part 71)
- Harmonization of various national and international standards, reviews
- Testing scenarios for packages
- Use "N" number in CoC's (71.59)
- Provide draft CoC's tom applicant for review
- Document agreements during pre-application meetings

Session 2 Suggestions

3. Question 3 (cont.)

- Better SAR references
- Docket needs to reflect basis for licensing decision
- Part 50 and Part 72 convergence
- Risk-informing decisions
- Applicability of of new ISGs to an in-process review
- Certain cases with overly restrictive Tech Specs – Need alternative approach
- Look at exemptions granted – make them generic

Session 2 Suggestions

3. Question 3 (cont.)

- Use of Direct Final Rulemaking
- ISG's
  - Implemenatation process
  - Backfit
  - Use of another regulatory tool
- Flexibility of small changes during the review
- Tech Specs need improvement
- Disconnect between ISG's and contractor report availability (ISG references)
- No opportunity for public comment on ISG's
- New schedules should always be public

Session 2 Suggestions

4. Is there confusion concerning proprietary submittals? How can we best get that information to you (e.g., additional guidance)?

- Should have publicly available summary of proprietary information submitted to NRC and discussed during meetings.

Session 2 Suggestions

5. What additional information relating to the Part 71 and Part 72 licensing process should be posted on the NRC Web site? Can you find all the NRC documents related to Part 71 and Part 72 licensing easily on the NRC Web site?

- Better NRC Page
  - Show CoC's pending
  - Tie to SER
  - User-friendly searches
- Online registry or database of registered users

Session 2 Suggestions

5. Question 5 (cont.)

- ADAMS Disaster
  - Unavailability of basic documents on cask designs, etc.
  - Findings available but no inspection report
  - No connection between decision document and rationale document

Session 2 Suggestions

NEW DISCUSSION TOPICS

- Provide applicants with an estimated cost of NRC review.
  - Helps applicants estimate cost of certification and approvals