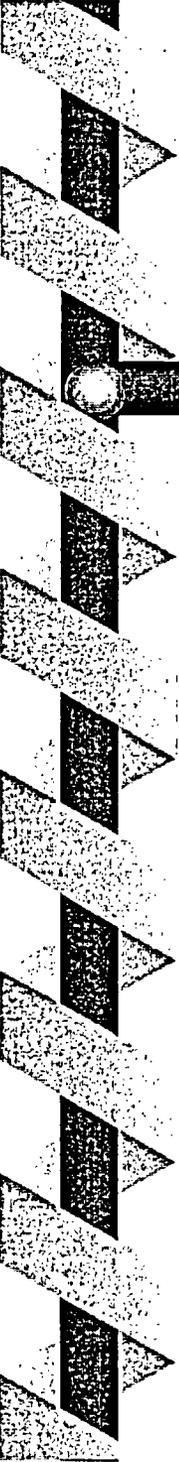


Early Site Permit Lessons Learned During the Safety Review

**Christian Araguas
U.S. Nuclear Regulatory Commission
September 8, 2005**





Lessons Learned

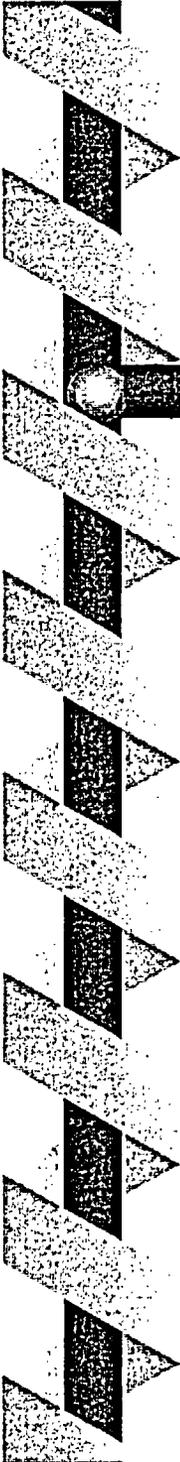
- **Application Format**
 - **Consistency of the information in the SSAR and ER (Application Revisions)**
 - **Site Characteristics Table**
 - **Sensitive Information Screening Review (SECY-04-0191)**
 - **Electronic Submission Requirements**
 - **Application Layout (RS-002, SRP)**



Lessons Learned

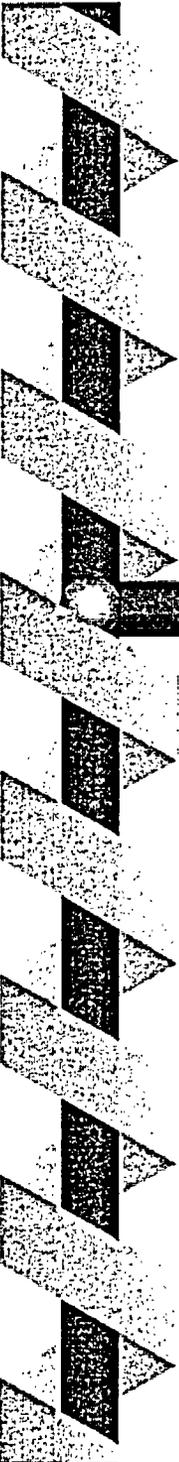
- **Application Content**

- **NUREG/CR-4461 “Tornado Climatology of the Contiguous United States”**
- **Branch Technical Position: Winter Precipitation Loads (ADAMS Accession Number ML050630277)**
- **Effective Communication With Staff (RAI Responses)**
- **Proposed Draft 10 CFR Part 52 Rule**
- **10 CFR Part 100 Requirements (Adsorption & Retention Coefficients, Normal Doses)**



Lessons Learned

- **Issues to Consider**
 - **Seismic Approach**
 - **Emergency Plan Approach**
 - **Site Redress Plan**
 - **PPE or Certified Design Approach**



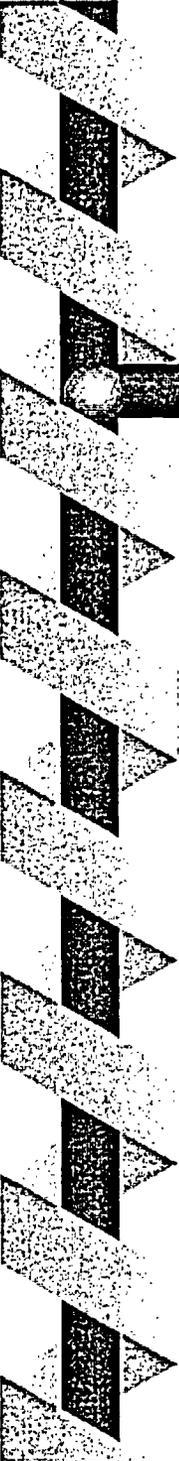
Early Site Permit Lessons Learned During the Environmental Review

Jack Cushing

U.S. Nuclear Regulatory Commission

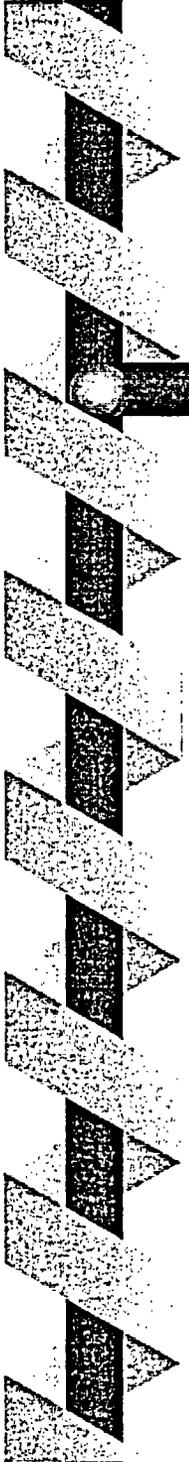
September 8, 2005





Lessons Learned

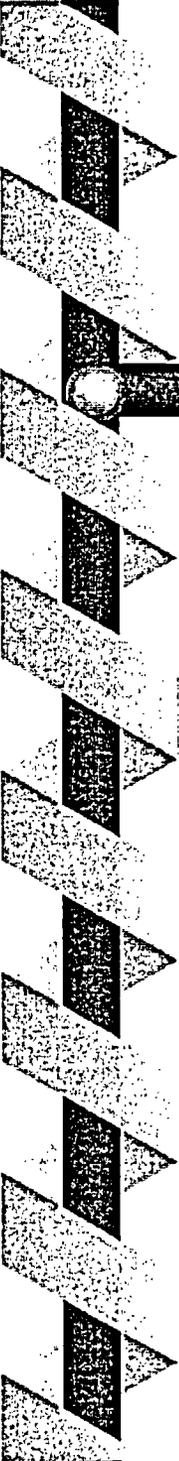
- **Pre-Application Guidance**
 - **Early Engagement Before Application**
 - **Understand the Decision Standards**
 - **Data and Analyses Must Support the Necessary Conclusions**



Lessons Learned

- **Content of Submittal Guidance**

- **Justify Applicability of Existing Information**
- **Clearly Document Assumptions and Mitigation Measures**
- **Include Commitments Related to Permits for Pre-Construction Activities**
- **Other-Than-Light-Water Reactors Add Challenges That Must be Addressed**



Lessons Learned

- **External Interfaces**
 - **Reconcile Concerns of State and Other Federal Agencies Early**
 - **Resolve Issues Related to CZMA and 401 Certifications Early**



Lessons Learned

- **Ongoing Issues Guidance**
 - **Flag Conforming Changes Between the Safety and Environmental Areas**
 - **Late Changes Could Require Re-Circulation of the Draft EIS**
 - **Minimize Differences Between the ESP and COL Designs**