

Development of Combined License Application Guidance



**NRC/NEI Public Meeting
December 1, 2005**



Background

- NEI submitted NEI-04-01, Revision D, “Draft Industry Guideline for Combined License Applications Under 10 CFR Part 52,” on December 21, 2004
- NRC held 6 public meetings with NEI COL Taskforce between February and July 2005
- NRC provided 252 comments on Revision D
- NEI provided Revision E of NEI 04-01 in October 2005



Background (continued)

- NEI 04-01 applicable to “base case” combined License (COL) application
 - ▶ Base case - COL application references a certified design and an early site permit
 - ▶ No “base case” COL applications expected to be submitted to NRC in the 2007/2008 time frame
- Part 52 Rulemaking
 - ▶ Commission considering draft proposed rule



COL Pre-Application Meetings

COL applicants are:

- Using NEI 04-01, Revision E, to develop COL applications
- Requesting discussions with NRC to identify what information needs to be included in a COL application



Development of NRC COL Application Regulatory Guide

- Starting point: Regulatory Guide (RG) 1.70, “Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants”
- Applicable to all light-water reactor COL applications submitted under 10 CFR Part 52 whether referencing a certified design, an early site permit, both, or neither
- Provide application guidance in a consistent and efficient manner
- Potential endorsement vehicle for NEI 04-01
- COL application guidance can only be finalized after Part 52 rule finalized



Sources for Development Of Regulatory Guide

- RG 1.70
- Updated Part 52 rule
- Updated Standard Review Plan
- NUREG-0933, “A Prioritization of Generic Safety Issues”
- Generic Letters and Bulletins
- Commission SECY papers and associated staff requirements memoranda
- Experience from previous design certifications and early site permits
- Others...



Contents of Regulatory Guide

- Part 1: Final Safety Analysis Report Chapters 1-19
- Part 2: Supplemental Information
 - ▶ Example: Probabilistic Risk Assessment
- Part 3: Appendices
 - ▶ COL Application Checklist
 - ▶ References to design certification and early site permit
 - ▶ Inspections, Tests, Analyses, and Acceptance Criteria
 - ▶ Cross-Cutting Issues
 - ▶ Format
 - ▶ Applicability of Industry Guidance



Schedule

- Draft COL application checklist
- Working draft copies of Chapters and appendices (to be placed on NRC Website)
- Issue Draft RG for Comment
- Public Workshop
- Issue Final RG
- March 2006
- February 2006 -June 2006
- June 2006
- July 2006
- Early 2007



Potential Endorsement Of NEI 04-01

- NEI should submit final version of NEI 04-01
 - ▶ NRC not planning to review Draft Revision E
 - ▶ NRC will focus on NEI comment resolutions
- Part 52 rule needs to be finalized
 - ▶ Several sections of NEI 04-01 state they will be updated when Part 52 rule is finalized
- Draft RG will map NEI 04-01 sections with draft RG to determine which sections provide sufficient guidance for base case COL
- Endorsement decision at issuance of final RG



Summary

- NRC expects several COL applications in late 2007 to 2008 time frame
 - ▶ Draft versions of NEI 04-01 do not match these applications
- NRC developing a RG to provide complete, consistent guidance to COL applicants on information needed to be included in a COL application
 - ▶ Applicable to COL applications referencing a design certification, early site permit, both, or neither
- Final version of NRC RG could potentially be an endorsement vehicle for industry guidance
 - ▶ Applicable to “base case” COL applications