



## INFORMATION SYSTEMS LABORATORIES

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January 16, 2006

Mr. David Matthews, Director  
Division of New Reactor Licensing  
U.S. Nuclear Regulatory Commission  
Mail Stop O12 E 5  
Washington, DC 20555

Dear Mr. Matthews:

The purpose of this letter is to inform you of the ISL plan to add an Environmental Review capability to our Nuclear Systems Analysis Division (NSAD) in Rockville.

To date, ISL/NSAD support to the NRC has grown from thermal hydraulic code development and application, to risk assessment, systems analysis, license renewal, severe accident mitigation alternative (SAMA), seismic safety, security and the development of a framework for a risk-informed, technology-neutral licensing process for future plants. We have developed areas of expertise in parallel with and in response to the increasing regulatory and safety analysis needs of the NRC and of other federal agencies.

We are aware of the increasing number of planned new reactor applications to the NRC and look forward to participating in their review. In addition to the new reactor analysis, systems and risk review areas with which we are familiar, the associated need for environmental review expertise is significant. Our interest in the environmental area has now reached a point where we have decided to move ahead with the development of such a capability.

We believe that there are areas where effectiveness and efficiency can be pursued in the environmental impact assessment regulatory infrastructure. Similar to the NRC work preparing for the many license renewal applications, work can be done to evaluate new reactor environmental impacts generically. Current ISL senior staff managed the development of the Generic Environmental Impact Statement (GEIS) while at the NRC. We have immediate plans to add to this capability, so that we will be in a position to support the NRC on new reactor environmental review policy, strategic options and formulation of generic approaches. In that regard, we will be prepared to assist in the preparation of review plans and guidance.

We believe that a generic NEPA evaluation of new reactors could be included in a GEIS developed in accordance with requirements in 10 CFR 51 and consistent with the provisions of 10 CFR 52. The GEIS would be codified in Parts 51 and 52. The license renewal GEIS (NUREG-1437) looked at the specific environmental impacts of

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continuing to operate plants for up to 20 years beyond their initial licenses. The findings codified in Part 51, Appendix B, apply to this extended period of operation of existing plants.

An approach to NEPA requirements for licensing new plants could involve the following:

Perform analyses to identify NEPA impacts that lend themselves to generic treatment by virtue of similarity among sites and reactor designs. The analysis would look at whether past studies adequately bound these impacts and it would determine the feasibility of additional studies that may be required.

Identify alternatives to optimize the value of existing information and additional study of NEPA impacts for new plant licensing. This would consider the resources and time required to compile existing and develop new studies, associated changes in regulations and regulatory guidance, the likelihood of success and the efficiencies that may be gained in licensing new plants.

Develop a program plan for undertaking generic studies and associated rulemaking.

Review NEPA focused technical studies and prepare documents required for the NEPA review and rulemaking processes.

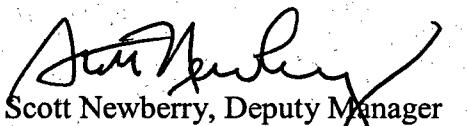
Undertake NEPA technical studies using analysts that have proper credentials.

In addition, we plan to have a capability to provide environmental impact statement peer review assistance. We believe that this will be increasingly important as the environmental workload increases.

At this point, we are also considering the additional option of a robust environmental review team at ISL that could take on the completion of an environmental impact statement. We expect to make decisions in this regard later this year.

We welcome any thoughts on the content of this letter and look forward to responding to any requests for proposals in the above areas.

Sincerely,



Scott Newberry, Deputy Manager  
Nuclear Systems Analysis Division

cc: J. Meyer, ISL  
R. Youngblood, ISL  
T. King, ISL