The following questions and comments were submitted by the public in the DG-1145 public workshop held on March 15, 2006

Bin 1: DG -1145 Process Development

The following comments and questions are related to the process being used to develop DG-1145. The responses to these questions and comments are on the NRC website.

1-1 When will the website be available to accept questions?

1-2 The development of DG-1145 and many sections in the standard review plan (SRP) are behind schedule. Have tangible measure been taken to improve schedule performance? What measurable metrics are available to restore public confidence in the NRC's schedule?

1-3 Would the NRC consider having a focused discussion on equipment qualification and other operational programs with respect to the information expected to be described in the final safety analysis report (FSAR)?

1-4 Please consider separating non security sections of chapter 13 for earlier Regulatory Guide (RG) discussion.

1-5 As the areas of training & procedures can be done in a standardized manner, early discussion of NRC's proposed "to do" list in these areas would be helpful.

1-6 It is suggested that NRC consider having smaller group discussions on particular topics at future public meetings. A large group presentation is not conducive to free exchange. Also both NRC and industry inputs should be made available in advance.

1-7 Chapter 4 was referenced by several people from both the NRC and industry as a direct lift from the design control document (DCD). A considerable amount of new information is required for chapter 4 of the combined license (COL) because a first cycle design (length, enrichments, burnable poison (BP) loadings, power distributions, safety analysis) is needed.

1-8 How can hyper links be incorporated into electronic submittals, if a file loses any external file linkage once it is placed in ADAMS?

1-9 What electronic submittal limitations exist for combined license (COL) application submittals?

1-10 What electronic packaging would best facilitate an expeditious NRC review?

1-11 The concern over the omission of review coverage relating to 10 CFR 20.1406 for the AP1000 is understood. This is a generic item that would apply to all combined license (COL) applications. The AP1000 Design Certification Rule (Part 52, Appendix D) notes

that generic changes are governed by the provisions in 52.63(a)(1). NRC should follow the process outlined in 52.63(a)(1) to include this as a change to the AP1000 Design Certification. This should not simply be a “slipped in” as part of the COL process.

1-12 Will sections C.III.1 and C.III.2 define what should be covered in the certified design and early site permit (ESP), or will these sections only reflect what is already in the AP1000 Design Control Document or existing ESP?

1-13 Much of the discussion recognizes variety in the COL application (e.g., reference to Design Certification application & ESP application). As a result, the NRC has stated a need for plant- and/or applicant-specific discussions. Yet, in pre-application meetings, the NRC is saying it does not have the time or resources for such plant- or applicant-specific discussions. Therefore, NRC has indicated it will undertake design-centered reviews and interact with the COL applicants according to which design certification referenced in their application. Please reconcile these different messages.

Bin 2: Part 52 Rulemaking

The following questions appear to be comments on the proposed rulemaking for 10 CFR Part 52. These comments have been forwarded to the Part 52 rulemaking team for consideration. If you would like to ensure that these comments are addressed in the final rule, however, resubmit your comments in accordance with the instructions in the March 13, 2006, *Federal Register* Notice (71 FR 1281), publishing the proposed rule for comment.

2-1. 10 CFR 52.79 (b), indicates that the combined license (COL) applicant referring to a certified design does not need to include information and analysis already submitted to the NRC in the generic design control document (DCD). The AP1000 Final Rule Statements of Consideration (SOC), in response to NEI comments, imply that the staff’s intent is that the generic DCD must be included in the COL application and not simply incorporated by reference. Please clarify this SOC. Is it related only to facilities staff? Review of departments? Is it not the option of the COL applicant to incorporate the generic DCD by reference?

2-2 Item 23 in the COL Application Acceptance Review Checklist discusses what should be in an final safety analysis report (FSAR) section yet to be determined. It describes an environmental review topic which does not belong in any FSAR. There is nothing in 10 CFR 50.10(e) that indicates that information is required to be included in the FSAR on this topic. A suggested revision is to move the acceptance criteria to Section 3, Administrative Requirements.

2-3 Item 39 in the COL Application Acceptance Review Checklist is a duplicate of Administrative Requirement 5(h). Item 39 should be deleted, the Administrative Requirement being more appropriate.

2-4 Item 3 in the COL Application Acceptance Review Checklist discusses a COL that references an early site permit (ESP). This is not consistent with several ESP conditions that have been proposed for the ESP application currently under review. An additional criterion for establishing permit conditions is necessary, i.e, that it can be accomplished prior to the date of issuance of the COL.

2-5 Item 4 in the COL Application Acceptance Review Checklist indicates the following should be in an final safety analysis report (FSAR) section 13.3: "*If the ESP approves complete and integrated emergency plans, or major features of emergency plans, the application contains information in the final safety analysis report that includes any new or additional information that updates and corrects the information that was provided under §52.17(b), and discusses whether the new or additional information materially changes the bases for compliance with the applicable requirements."* This is based on proposed rule language. The updating requirement will be addressed with comments on the rulemaking.

Bin 3: COL Application Timing

The following questions relate to the timing of combined license (COL) application submittals when other Part 52 products are under review (i.e., Design Certification or Early Site Permit). The NRC plans to make a presentation on this topic during a future DG-1145 public meeting.

3-1 Is it acceptable to incorporate by reference in the COL application a design control document (DCD) that is not yet approved?

3-2. How will DG-1145 address COL applications that reference a certified design versus a design being reviewed for certification in parallel with the COL?

3-3 Sections C.III.1 and C.III.2 should address scenarios where a COL application is being reviewed in parallel with a certified design or an early site permit.

Bin 4: Inspection

The following questions are related to inspection/audit issues. The NRC plans to present a discussion on the inspection/audit issues associated with the review of a combined license (COL) application at a future DG-1145 public meeting .

4-1 What is the relationship of first-of-a-kind engineering (FOAKE) to the NRC's decision to issue a COL?

4-2 The translation of a certified design into the detailed design should be part of the NRC inspection program. The current draft of section 12 appears to step into the inspection activities. Can a boundary be established between items that must be in a COL application and those that will be part of NRC inspection?

4-3 It would be very constructive to differentiate between areas where detailed design is being requested versus non-design-oriented items. The detailed design items would be component selection and layout issues. The non-design-oriented items would be operational issues, site specific issues, or new requirements.

4-4 NRC should clearly separate design inspections from COL content. Design inspections should be handled by the vendor. The detailed design information provides implementation of the design certification. These detailed design related inspections should not be any different than construction inspections. Please provide guidance which characterizes how this information will be dealt with in licensing space versus inspection/verification space.

Bin 5: DG-1145 Development Questions

The following questions are directly related to the development of DG-1145. These questions will be addressed on the NRC website and included in DG-1145, Section C.IV.11, when it is issued for public comment.

C.I.1-1 Will DG-1145 include a list of relevant generic issues to be addressed by the applicant (such as GSIs, USIs, Generic Letters, Bulletins, and Information Notices)? This would be very helpful and would ensure consistency in the applications.

C.I.1-2 Please discuss how a combined license (COL) applicant should address differences between the structure of Part I of G-1145D and that of the design control documents (DCD) of previously certified designs.

C.I.1-3 Will the guide clearly differentiate between issues and COL application elements that are specific to different types of reactors?

C.I.1-4 Will a separate evaluation be required for thermal-hydraulic codes for evolutionary plants? If the codes are already approved (e.g., per 10 CFR 50.46) and no testing has been done for new models (as in the case for passive plants), why would an extensive staff review be required?

C.I.1-5 Can DG-1145 address closure of design acceptance criteria (DAC) via topical reports with regard to standard review plan (SRP) revision timelines? Would a topical report be reviewed against the SRP in place in six months prior to topical submittal?

C.I.1-6 For areas where there are design acceptance criteria (DAC) in a certified design, will the closure of the DAC be reviewed against a forthcoming standard review plan (SRP) revision or against the SRP revision utilized for the design certification?

C.I.1-7 Will Section I.1 of DG-1145 provide guidance for satisfying the 10 CFR 52.79a requirement to address standard review plan conformance, operating experience, and other information historically discussed in final safety analysis report (FSAR)?

C.I.1-8 Please explain NRC expectations for how the following would be addressed:

A. The Design Certification addresses one standard review plan (SRP) version for design issues and the combined license (COL) application would address a potentially different SRP version for non-design issues.

B. Topical Reports may reach closure on an issue on a potentially different version of the SRP. How would this be identified in the COL application (to address the regulation on SRP conformance) and what completion/closure would be afforded?

C.I.1.6-1 Are topical reports intended to act as additions to the design control document that will be finalized and incorporated by reference? Or, will each combined license (COL) applicant have to draw from the topical report in their own application?

C.I.1.8-1 Will the proposed regulatory guide discuss the level of detail needed for site specific conceptual design engineering information that needs to be included in the COL application?

C.I.4-1 Chapter 4 was referenced by several people from both the NRC and industry as a direct lift from the design control document (DCD). A considerable amount of new information is required for chapter 4 of the COL because a first cycle design (length, enrichments, burnable poison (BP) loadings, power distributions, safety analysis) is needed. Please clarify.

C.I.11-1 Many of the reactor vendors are proposing the use of modular skid mounted systems for rad waste processing and treatment. Will the combined license (COL) guidance factor in this approach?

C.I.12-1 Section 12 references neither RG 1.70 nor NEI-04-01. Please clarify the relationship between DG-1145 and these documents.

C.I.12-2 Many of the items on the ‘combined license (COL) with DCD To Do List’ should have been addressed in the AP1000 design control document (DCD) (e.g., dose levels for tank rooms should be defined in Tier 1 or 2 criteria). Should this information not be addressed separately from the COL application, the COL application review would be made more of an inspection to verify implementation. Please clarify how such information will be treated in the review and/or post-COL stage.

C.I.12-3 It appears that there were many items identified in Section 12 that were not derived from design control document combined license (COL) action Items. Is it reasonable to assume that the regulatory guide will correspond closely enough to the standard review plan and staff's expectations such that properly addressing each issue in the regulatory guide will constitute a satisfactory final safety analysis report (FSAR) chapter? Or, is it likely that other unspecified issues will arise? If so, how will they be addressed?

C.I.12-4 While the concern over the omission of review coverage relating to 10 CFR 20.1406 for the AP1000 is understood, 10 CFR Part 52 has provisions for such issues. This is a generic item that would apply to all COL applications. The AP1000 Design Certification Rule (Part 52, Appendix D) notes that generic changes are governed by the provisions in 10 CFR 52.63(a)(1). NRC should follow the process outlined in 10 CFR 52.63(a)(1) to include this as a change to the AP1000 Design Certification. This should not simply be "slipped in" as part of the combined license (COL) process.

C.I.12.1-1 Please clarify the criteria that will be used to judge compliance with the requirement to provide "incorporation and use of experience from past designs and operating plants" in design and as low as is reasonably achievable (ALARA) programs. Please also provide the context of the regulatory basis for this requirement.

C.I.12.1-2 In the discussion of Section 12.1, Mr. Hinson stated that operating experience would be addressed in the context of future design activities. This issue appears to relate more to design certification than the combined license (COL).

C.I.12.1-3 The following items in Section 12.1.2 are not believed to be "review areas to be addressed in a combined license (COL) application referencing a certified design." Rather, it is believed that they should be considered to have been closed through the AP1000 Design Certification:

a. "Describe the as low as is reasonably achievable (ALARA) design guidance and training ... during initial plant design."

b. "Also, describe the design considerations implemented to ensure that occupational radiation exposures during decommissioning will be ALARA."

C.I.12.2-1 How does one reconcile the recognition by the staff that the design will not necessarily be 100% complete with the DG-1145 language that "all" sources will be identified and "all" equipment will be located in a COL application?

C.I.12.2-2 Is it a regulatory requirement that the final safety analysis report (FSAR) contain identification of all sources and all equipment?

C.I.12.2-3 In regards to the third bullet on Section 12.2, explicitly identify this item as relating to confirmed shield design only.

C.I.12.2-4 In regards to Section 12.2, what makes up the source term (e.g., waste, sources, fuel, fixed contamination on pipes, activated components)? How would NRC expect this to be tracked?

C.I.12.2-5 The following item in Section 12.2.1 is not believed to be a "review area to be addressed in a combined license (COL) application referencing a certified design." Rather, it is believed that it should be considered to have been closed through the AP1000 Design Certification:

"Describe any required radiation sources ... that exceed 100 millicuries." Assuming the COL applicant does not have new sources not envisioned by the design control document and final safety evaluation report (FSER), this matter would not be open for additional consideration.

C.I.12.3-1 Section 12.3.4 refers to ANSI N13.1-1993 for effluent monitor design. Design Control Document Section 11.5 indicates the radiation monitoring system was designed to ANSI N13.1-1969. Based on recent experience at Salem and Surry, there is a very significant difference between the two versions of the standard, completely changing the design approach. Is the NRC going to require compliance with the 1993 version of the standard? If so, the design and operation of the system may be significantly affected.

C.I.12.3-2 What is the minimum set of radiation protection facilities that must be described either in a design certification (DC) or COL application?

C.I.12.3-3 The following items in Section 12.3.1 are not believed to be "review areas to be addressed in a combined license (COL) application referencing a certified design." Rather, it is believed that it should be considered to have been closed through the AP1000 design certification:

c. "Describe each very high radiation area ... and radiation monitor locations for each of these areas."

d. "Provide an illustrative example of each of the following components (including equipment and piping layouts), when applicable, and describe any associated design features intended to minimize personnel dose during operation or maintenance of the component ... minimize personnel exposure." Some of this information is included in the AP1000 design control document (DCD); other design information which was not provided or requested to be in the DCD should not be considered anew in the COL process.

e. "Provide scaled layout and arrangement drawings of the facility. ... Accurately locate positions, indicating the approximate size and shape of

each source." Again, the AP1000 DCD includes a significant amount of information in this regard; the matter cannot be reconsidered during the COL process.

C.I.12.3-4 Major components, such as heat exchangers, pumps, large piping and valves, would likely be located on arrangement drawings in the design control document (DCD). With those equipment locations established, various radiation zones would be established and described in the DCD for NRC review during the design certification review stage.

Since, in the case of the AP1000, the subject radiation zones were provided in the DCD, it is not clear as to why this information would be requested by the Section 12.3 review guidance for a COL application referencing the AP1000 certified design. In general, it is expected that design matters within the scope of the standard design would be reviewed during design certification. Additional engineering design detail regarding the implementation of the certified standard design would be audited or inspected by the NRC as part of its engineering design verification activities (first-of-a-kind engineering inspections). Please clarify the basis for this guidance in the proposed DG-1145.

C.I.12.3-5 For location information regarding minor equipment locations, such as radiation area monitors, it is expected that the design control document (DCD) would describe the types of monitors to be used and their general locations, such as by naming the rooms or plant areas. Exact monitor placement represents a level of design detail that may not be available in the DCD or at the time of combined license (COL) application development. However, the DCD should describe the general process or criteria that would be used for radiation monitor placement.

In the case of the recently certified AP1000 design, the DCD describes general locations of radiation monitors, as well as the criteria for establishing exact monitor locations. An example of criteria for defining monitor locations is provided in DCD (Tier 2) Section 11.5.6.2 for the TSC Area Monitor. Please clarify application content guidance in regards to this issue.

C.I.12.5-1 The operational program described in Section 12.5 appears to include the program to implement the certified design into the detailed design. Please clarify.

C.I.12.5-2 What is an example of the additional level of detail required in the COL concerning equipment type and location versus that provided for design certification?

C.I.12.5-3 Does the staff understand and expect that combined license (COL) applications may not identify equipment selections and locations within rooms? This is first of a kind engineering (FOAKE) that is not required for COL. Rather, COL applications may state that “Radiation protection equipment will be selected and located within the plant with appropriate consideration for as low as is reasonably

achievable (ALARA) and operating experience." This would be an inspection matter for the staff post-COL issuance.

C.I.12.5-4 In Section 12.5, how would an applicant describe personnel responsibility for implementation and documentation radiation protection program reviews, if such personnel have not been selected at the time of COL?

C.I.12.5-5 In regards to the Equipment and Instrumentation discussion in Section 12.5.1, are the quantities, sensitivities, rangers, alarms and calibration frequencies of detectors and monitors needed at the combined license (COL) application phase? This information will not be known until much later.

C.I.12.5-6 In regards to the second bullet on the Section 12.5 slide, Equipment, Instrumentation and Facilities, is Section 12.5.3 of NEI 04-01E template guidance acceptable to the staff as the content of Section 12.5.3 of a combined license (COL) application final safety analysis report (FSAR)?

C.I.12.5-7 What are the application portions of NUREG-1736 that must be addressed by combined license (COL) applicants?

C.I.14.3-1 Will the guidance focus on defining inspection, test, analyses, and acceptance criteria (ITAAC) for a one-of-a-kind review, or is it intended to focus on process? If it is process, will it cover preparation and performance of ITAAC verification?

C.I.1.19-1 Why is the title of Chapter 19 "Severe Accidents?" A more appropriate and encompassing title may be "Probabilistic Risk Assessment (PRA) Information" or "PRA Information and Severe Accidents."

C.II.3-1 The staff indicated in the March 15th workshop that Regulatory Guide 4.2 (Environmental Reports, 1973) would be updated. Please indicate the planned schedule for this revision and the plans for public participation.

C.II.3-2 In the March 15th workshop, the Staff noted the NUREG-1555 is in need of review and potential update in some areas. Updated guidance is critical to applicants currently engaged in the development of environmental reports required for early site permit (ESP) and combined license (COL) applications. Please indicate the plan for updates to NUREG-1555, in particular those related to transmission ROW reviews, need for power, alternate energy source analyses, and other aspects impacted by movement to non-regulated generation in some markets.

C.III-1 Will Part III of the regulatory guide discuss how the NRC staff expects a combined license (COL) applicant to address COL action items in the final safety evaluation report (FSER) of AP1000?

C.III.1-1 How will NRC communicate the level of detailed design information required for the non-COL action items that are on the combined license (COL) “To-Do” list and are related to design?

C.III.1-2 The translation of a certified design into the detailed design should be part of the NRC inspection program. The current draft of section 12 appears to step into the inspection activities. Can a boundary be established between items that must be in a COL application and those that will be part of NRC inspection ?

C.III.1-3 It would be very constructive to differentiate between areas where detailed design is being requested versus non-design-oriented items. The detailed design items would be component selection and layout issues. The non-design-oriented items would be operational issues, site specific issues, or new requirements.

C.III.1-4 NRC should clearly separate design inspections from combined license (COL) content. Design inspections should be handled by the vendor. The detailed design information provides implementation of the design certification. These detailed design related inspections should not be any different than construction inspections. Please provide guidance which characterizes how this information will be dealt with in licensing space versus inspection/verification space.

C.III.1-5 As a general comment, our understanding of the meaning of design certification is that a combined license (COL) applicant who references a certified design is only required to address COL Open Items which were identified as part of the design certification. Design related issues which were not identified as COL Open Items are not required to provide additional or more detailed information as part of the COL process. There may be areas which are subject to NRC audits and inspection, but these should be handled outside of the COL process.

C.III.3-1 Please clarify that the license renewal precedent for identifying new and significant information on the basis of the environmental impact statement (EIS) versus the applicant environmental report (ER) is relevant. Note that in license renewal, licensees identify new and significant information on the basis of the ER, not the EIS alone.

C.III.4-1 Will the guidance provide expectations for timeliness of combined license (COL) application information submittals (i.e COL Action Items or Information Items) for items not complete at the time that the COL application is submitted? Examples are procedure descriptions, qualification of personnel and results of as-built verifications.

C.III.4-2 In regards to addressing COL Action Items and Information items, will the timing of submittal of information be at the time that the combined license (COL) application is submitted, before COL application is approved, or before the (Part 52.)103g hearing?

C.III.4-3 What will be the staff's likely position on combined license (COL) acceptance criteria with respect to COL action items to be completed at the time of COL submission, COL action items to be completed during NRC COL review, and COL action items to be completed after receipt of COL?

C.III.4-4 What is the regulatory requirement or basis that allows the imposition of design-related requirements not raised during design certification to become part of the COL application process? (e.g., the requirement to provide additional operating experience to that considered in the AP1000 design) Please clarify, to the extent that this information is not related to a combined license (COL) action Item, the amount of detail with respect to design information requested in the COL application.

C.III.5-1 Will Section C, Part III, also address finality related to the portion of an environmental report (ER) associated with a design certification document? The new 10 CFR Part 52 and conforming changes to Part 51 include requirements for a "generic" ER.

C.IV.1-1 The approach of requiring all information to be complete for review at combined license (COL) submittal is very restrictive and may not be necessary. For example, the plant specific probabilistic risk assessment (PRA) is done after all other COL work is done, taking an additional 3 to 6 months to complete PRA report. Will it be acceptable to submit the PRA 3 months after the final safety analysis report (FSAR)? All submittal requirements for a COL application should be thoroughly justified .

C.IV.1-2 How will the staff deal with areas where the design is not complete at COL?

C.IV.1-3 Does the first table that correspond to 10 CFR 52.79(a)?

C.IV.1-4 In an acceptance review, the submittal of sufficient information in an application to complete NRC staff review implies that there will be no requests for additional information (RAIs), except for clarification. Should this be restated as a goal with practical guidance?

C.IV.1-5 Consider changing the criteria to "Is there sufficient information to complete the review," or articulate the real differences between the criteria and the earlier criteria.

C.IV.1-6 If all boxes are checked "Yes," will NRC accept the combined license (COL) and begin this review?

C.IV.1-7 What would be the nature of RAIs for a COL application that is accepted as complete?

C.IV.1-8 The March 15th workshop provided insights and additional helpful information regarding the checklist. However, the current form of Part IV.1 contains only the "checklist" itself with no accompanying explanation. It would be helpful if Part IV.1 included an explanation to properly distinguish between the acceptance review and the later, more detailed technical review by the staff.

C.IV.1-9 On page 8, Item 37 refers to Section C.II.6 which does not appear to be listed in the DG-1145 table of contents. Is Section C.II.6 to be provided later, or is this an incorrect reference? Should there also be a reference to Sections C.II.4 and 5?

C.IV.1-10 Page 8, Item 37 refers to the ESBWR design control document (DCD) application checklist which included an explicit listing of bulletins and generic letters that were expected to be addressed. As discussed in the March 15th workshop, compliance discussions for older generic communications can be quite difficult because they are dated. Some are superceded by later generic communications and other NRC actions. It would be most helpful if the Staff were to review generic communications and reduce the number of older documents that must be addressed and provide an explicit listing as was done in the ESBWR DCD application checklist.

C.IV.1-11 On page 8, Item 32 indicates that it seeks "technical qualifications" of the applicant. It is not clear as to why this item cites 10 CFR 50.57(a) which appears to relate to issuance of the operating license (specifically 50.57(a)(4) which pertains to both technical and financial qualifications). In that the checklist applies to application contents and that Item 32 refers to "technical qualifications," a more appropriate citation would be 50.34(b)(7) which specifically applies to application content requirements.

C.IV.1-12 On page 12, it suggested the title of this section be reworded since the section's subject matter is broader than the final safety analysis report (FSAR). That is, Item 3 includes the Environmental Report part 51 information. This would typically be provided in a separate section or "part" of the combined license (COL) application and would therefore have an "FSAR" section reference, as implied by the column header.

C.IV.1-13 Item 15 indicates the following should be in the final safety analysis report (FSAR) section 13.4, "*The application contains a description of the program for monitoring the effectiveness of maintenance necessary to meet the requirements of 10 CFR 50.65."* However, the standard review plan (SRP) update program schedule indicates that the Maintenance Rule would be addressed in SRP 17.x (to be issued final Dec 2007). A suggested revision is to identify Item 15 as FSAR section 17.x or TBD.

C.IV.1-14 Item 1 should be moved to the Administrative Requirements. The proposed rule does not require the probabilistic risk assessment (PRA) to be part of the final safety analysis report (FSAR), just part of the application. Performing a 10 CFR 50.59 evaluation of design changes with the PRA as part of the FSAR would be

a significantly more difficult task than it currently is.

C.IV.1-15 The sufficiency standard should be information adequate to begin, not complete, the review. In addition, the sufficiency standard should not be used as an alternative means to reject applications which prefer a different technical position than the merits with which the staff agrees. Sufficiency does not equate to ultimate legal adequacy. It merely means that there must be a reasonable amount of information upon which staff can commence its review of an application that meets regulatory requirements.

C.IV.1-16 Item 37 in the COL Application Acceptance Review Checklist seeks “comparable international operating experience.” In the same way that the NRC provides generic communications as the source of potential operating experience insights, it would seem appropriate that a domestic COL applicant would look to NRC generic communications as the source for potential foreign experience. It is suggested that the NRC clarify its position on this issue. As the lead federal agency, the NRC should provide this information to COL applicants by generic communications or other appropriate means.

C.IV.2-1 Reference to the design certification (DC) in the COL application should be encouraged over incorporation of DC text in the COL application

C.IV.2-2 If the reactor vendor revises the design control document (DCD), no changes would be required to the text of the combined license (COL) application since the DCD is referenced in the COL application. Does the NRC need to be informed by letter that the DCD revision does not impact the COL application?

C.IV.2-3 What is the preferred approach for updating the COL application when the design control document (DCD) is revised?

C.IV.2-4 Could material that was referenced or incorporated by using the copy-and-paste method from an approved generic design control document be re-opened during the combined license (COL) review?

C.IV.3-1 The discussion regarding parallel review combined license (COL) and design certification (DC) indicated that the DC review would be impacted if a site specific issue came up in the COL after the DC had been approved. How is this different than the case where a COL application references an existing DC, such as AP1000? The examples given were seismic loads and category 4 wind loads. These same challenges occur, but the design control document is not impacted.

C.IV.9 The title of Part 1.B., “Codes and Testing,” is apparently incorrectly interpreted as relating to standard and industry codes (such as ASME, ANS, IEEE, etc). It is recommended that the title be revised to clarify Staff intent, e.g., “Computer Codes and Verification & Validation.”

Bin 6: Standard Review Plan Update

The following questions are related to the update of the standard review plan (SRP). The NRC will provide a presentation on the SRP update during the April DG-1145 public meeting.

6-1 The development of DG-1145 and many sections in the standard review plan (SRP) are behind schedule. Have tangible measure been taken to improve schedule performance? What measurable metrics are available to restore public confidence in the NRC's schedule?

6-2 Will Chapter 1.0 provide guidance on SRP compliance and how to address changes in SRP status over the life of a combined license (COL)?

6-3 In chapters where the SRP revision schedule does not support DG-1145, what steps is NRC taking to deal with eventual mismatches?

6-4 The SRP update program schedule was posted in December 2005 showing priority 1 sections targeted for public issuance ranging into May 2007. Priority 2 sections are similarly targeted for dates into December 2007. Final approvals are scheduled beyond these dates. SRP sections that are considered priority 1 and 2 are of high interest to COL applicants, given their potential and likely impact to operational and application specific matters. They are also of high interest to COL applicants who will reference the ESBWR or EPR design.

6-5 In the March 15th workshop, the Staff indicated that there is close coordination between technical branches to achieve appropriate consistency between the DG-1145 and SRP updated guidance. Please provide additional information as to how the DG-1145 can be finalized with an apparent large volume of SRP guidance not developed or made public until after DG-1145 is finalized in December 2006.

6-6 Item 15 in the COL Application Acceptance Review Checklist indicates the following should be in the Final Safety Analysis Report (FSAR) sections 13.4, "*The application contains a description of the program for monitoring the effectiveness of maintenance necessary to meet the requirements of 10 CFR 50.65."* However, the SRP update program schedule indicates that the Maintenance Rule would be addressed in SRP 17.x (to be issued final Dec 2007). A suggested revision is to identify item 15 as FSAR section 17.x or TBD.

6-7 Item 31 in the COL Application Acceptance Review Checklist indicates what information should be included in a FSAR section. The SRP update program schedule does not indicate that an SRP is under development to address the topic in item 31. Will guidance on this topic be discussed in one of the upcoming workshops to let the applicants know what should be included?