



NUCLEAR ENERGY INSTITUTE

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March 31, 2006

Mr. Gary M. Holahan  
Associate Director for Risk Assessment and New Projects  
Mail Stop 5 E7  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**PROJECT 689**

**SUBJECT:** Schedule for DG-1145 Workshops

Dear Mr. Holahan:

This letter describes the industry understanding of the NRC near-term schedule (see enclosure) for developing draft regulatory guide DG-1145, *Combined License (COL) Applications for Nuclear Power Plants (LWR Edition)*. Our understanding is based on the discussions in the NRC March 15, 2006 workshop on the draft regulatory guide. DG-1145, when issued in final form, will be a primary tool of COL applicants developing quality combined license applications.

The industry will fully support the aggressive schedule described by the NRC for the development of DG-1145. We applaud the efforts being made by the NRC staff to explain and issue the draft guideline for public comment in June 2006. We agree that this date is important because it will lead to the final guide being issued by the end of the year. This vital milestone is a critical step in assuring the submittal of quality combined license applications in 2007.

The industry will identify lead personnel and will be prepared to interact with NRC technical staff on the guideline sections to be discussed at each workshop. NEI and the lead industry personnel for each section will coordinate industry subject matter experts and develop industry comments, as necessary.

The phased rollout of draft DG-1145 and the associated public workshops to discuss the draft sections as they become available will be of great value to both the applicants preparing combined license applications and the NRC staff preparing review guidance. Equally important will be the continuation of public meetings, if needed, during the comment period on the completed draft regulatory guide, post

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June 2006. These additional interactions will further improve the level of common understanding on the information to be provided in combined license applications. It will ultimately result in more efficient regulatory interactions going forward into the combined license review phase.

In parallel with the development of DG-1145, the NRC is moving forward with updating the NRC Standard Review Plan (SRP), yet this will not be complete until 2008, after the first combined license applications are filed. We agree that it is important to take the necessary actions during the development of DG-1145 to ensure that the SRP sections are consistent with DG-1145. Inconsistency between these two programs presents the potential for introducing instability into the regulatory process during the review of the first combined license applications and eroding industry and investor community confidence in the Part 52 process.

The interactive and focused discussions in the March 15 workshop on the difference between the information contained in a referenced design certification versus the additional scope of information that a COL applicant must provide were beneficial. In the workshop, the NRC staff responded to questions and committed to post questions and corresponding answers on the NRC New Reactors web site. We understand that this practice will be continued for future workshops and public meetings on the regulatory guide. This innovative step will provide prospective COL applicants, all of whom plan to build NRC-certified designs, with timely information as the first COL applications are being written.

In the March 15 workshop only two sections (COL Application Acceptance Checklist and FSAR Chapter 12, Radiation Protection) were discussed instead of the seven sections of DG-1145 that were initially planned. We understand that draft guidance on five deferred FSAR chapters will be discussed in April 2006. This means that 22 draft sections are scheduled to be discussed in the April and May workshops. If necessary, we would support parallel breakout meetings on sections and, if necessary, follow-up meetings to help NRC maintain the schedule for publication of the draft regulatory guide.

We request NRC confirmation our understanding of the enclosed schedule as soon as possible. Also, there would be additional benefit if the schedule is posted on the NRC New Reactors web site. This confirmation will enable applicants and the public to plan and prepare for their participation in each workshop. It will assure the most efficient use of industry and NRC resources in the development of this critical regulatory guide.

The information and suggestions in this letter are intended to support industry and NRC pre-combined license application activities and attain our common goal: the

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development of guidance and understandings that will enable licensees to draft high quality combined license applications.

If you have any questions, please contact me at (202) 739-8094; [aph@nei.org](mailto:aph@nei.org) or Russ Bell at (202) 739-8087; [rjb@nei.org](mailto:rjb@nei.org).

Sincerely,

A handwritten signature in cursive script, appearing to read "A. P. Heymer".

Adrian P. Heymer

Enclosure

c: Mr. David B. Mathews, NRC  
Dr. William D. Beckner, NRC  
Mr. Joseph Colaccino, NRC  
Document Control Desk

**Enclosure – Expected Schedule for Phased Rollout of DG-1145 COLA Guidance and Associated NRC Workshops**

Table Notes

1. Draft guidance is to be available no later than two weeks before the workshop at which it is expected to be discussed
2. Three weeks is provided for NRC to post responses to questions after each workshop
3. Shading means draft guidance is available and has been discussed in an NRC workshop.

	<b>DG-1145 Section/ FSAR Chapter</b>	<b>Draft Guidance Available</b>	<b>Workshop</b>	<b>NRC Responses to Workshop Questions</b>	<b>Industry Follow-up Written Comments or Public Meeting (as appropriate)</b>
<b>I.1</b>	Introduction and General Plant Description	TBD - 2 weeks	#3 May TBD	TBD + 3 weeks	During comment period
<b>I.2</b>	Site Characteristics	TBD - 2 weeks	#3 May TBD	TBD + 3 weeks	During comment period
<b>I.3</b>	Design of Structures, Systems and Components	May 30	#4 June 13-14	July 5	During comment period
<b>I.4</b>	Reactor	April 6	#2 April 20-21	May 11	May 25
<b>I.5</b>	Reactor Coolant System and Connected Systems	TBD - 2 weeks	#3 May TBD	TBD + 3 weeks	During comment period
<b>I.6</b>	Engineered Safety Features	TBD - 2 weeks	#3 May TBD	TBD + 3 weeks	During comment period
<b>I.7</b>	Instrumentation and Controls	May 30	#4 June 13-14	July 5	During comment period
<b>I.8</b>	Electrical Power	April 6	#2 April 20-21	May 11	May 25
<b>I.9</b>	Auxiliary Systems	TBD - 2 weeks	#3 May TBD	TBD + 3 weeks	During comment period
<b>I.10</b>	Steam and Power Conversion	TBD - 2 weeks	#3 May TBD	TBD + 3 weeks	During comment period
<b>I.11</b>	Radioactive Waste Management	TBD - 2 weeks	#3 May TBD	TBD + 3 weeks	During comment period

<b>DG-1145 Section/ FSAR Chapter</b>		<b>Draft Guidance Available</b>	<b>Workshop</b>	<b>NRC Responses to Workshop Questions</b>	<b>Industry Follow-up Written Comments or Public Meeting (as appropriate)</b>
<b>I.12</b>	Radiation Protection	March 14	#1 March 15	April 5	April 19
<b>I.13</b>	Conduct of Operations	April 6	#2 April 20-21	May 11	May 25
	13.1 Organizational Structure				
	13.2 Training Program	April 6	#2 April 20-21	May 11	May 25
	13.3 Emergency Planning	April 6	#2 April 20-21	May 11	May 25
	13.4 Review and Audit	April 6	#2 April 20-21	May 11	May 25
	13.5 Plant Procedures	April 6	#2 April 20-21	May 11	May 25
	13.6 Security	TBD - 2 weeks	TBD	TBD + 3 weeks	During comment period
<b>I.14</b>	Initial Test Program and ITAAC	April 6	#2 April 20-21	May 11	May 25
<b>I.15</b>	Accident Analysis	May 30	#4 June 13-14	July 5	During comment period
<b>I.16</b>	Plant-Specific Tech Specs	April 6	#2 April 20-21	May 11	May 25
<b>I.17</b>	Quality Assurance	April 6	#2 April 20-21	May 11	May 25
<b>I.18</b>	Human Factors Engineering	May 30	#4 June 13-14	July 5	During comment period
<b>I.19</b>	Plant-Specific PRA Information & Severe Accidents	May 30	#4 June 13-14	July 5	During comment period
<b>II.1</b>	Plant-Specific PRA	May 30	#4 June 13-14	July 5	During comment period
<b>II.2</b>	ITAAC	May 30	#4 June 13-14	July 5	During comment period

<b>DG-1145 Section/ FSAR Chapter</b>		<b>Draft Guidance Available</b>	<b>Workshop</b>	<b>NRC Responses to Workshop Questions</b>	<b>Industry Follow-up Written Comments or Public Meeting (as appropriate)</b>
<b>II.3</b>	Environmental Report	April 6	#2 April 20-21	May 11	May 25
<b>III.1</b>	Portions of FSAR Not Covered by Design Certification	These topics are expected to be covered in connection with the discussions in Part I and Part II, above.			
<b>III.2</b>	Portions of FSAR Not Covered by ESP				
<b>III.3</b>	Finality of FEIS Associated with an ESP				
<b>III.4</b>	COL Action Items				
<b>III.5</b>	Design Acceptance Criteria				
<b>IV.1</b>	COLA Acceptance Review Checklist	March 9	#1 March 15	April 5	April 19
<b>IV.2</b>	COLA Submittal Specifications	April 6	#2 April 20-21	May 11	May 25
<b>IV.3</b>	Change Processes	TBD - 2 weeks	TBD	TBD + 3 weeks	During comment period
<b>IV.4</b>	Operational Programs	April 6	#2 April 20-21	May 11	May 25
<b>IV.5</b>	General & Financial Info	TBD - 2 weeks	TBD	TBD + 3 weeks	During comment period
<b>IV.6</b>	Site Redress Plan and LWA	April 6	#2 April 20-21	May 11	May 25
<b>IV.7</b>	Pre-Application Interactions	April 6	#2 April 20-21	May 11	May 25
<b>IV.8</b>	Response to Public Comments on DG-1145	N/A			
<b>IV.9</b>	Applicability of Industry Guidance	TBD - 2 weeks	TBD	TBD + 3 weeks	During comment period