

## B. DISCUSSION

This regulatory guide provides guidance regarding the information to be submitted in a COL application for a nuclear power plant. Therefore, this guide addresses many, albeit not all, of the application options allowed by 10 CFR Part 52. Although a COL applicant is not required to conform to this guidance, its use will facilitate both the preparation of a COL application by the applicant and the timely review of the application by the NRC staff. Nonetheless, the reader should note that, although this guide may not cover all current regulations pertaining to a COL application, the application must address all such regulations.

The regulatory positions in Section C of this guide are divided into four parts. Part I addresses the information requirements specified in 10 CFR 52.79, “Contents of applications; technical information in Final Safety Analysis Report.” Thus, Part I provides COL applicants with guidance regarding the information that the staff needs to resolve all safety issues related to the proposed COL. Moreover, Part I is intended for use by COL applicants who are **not** referencing certified designs. Part I includes 19 sections. Section C.I.1 provides broad generic guidance, although COL applicants have the option not to maintain some of this information in Chapter 1 of the FSAR. Sections C.I.2–C.I.17 are based on the existing guidance provided in RG 1.70, “Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants,” issued November 1978, although the NRC staff has updated the guidance in those sections to reflect the current information requirements for COL applications. In contrast, Sections C.I.18 and C.I.19 specify information requirements that are not addressed in RG 1.70. In addition, the reader should note that Sections C.I.2–C.I.19 correspond to Chapters 2–19 of NUREG-0800. The level of information needed for those sections depends on the complexity of the topic.

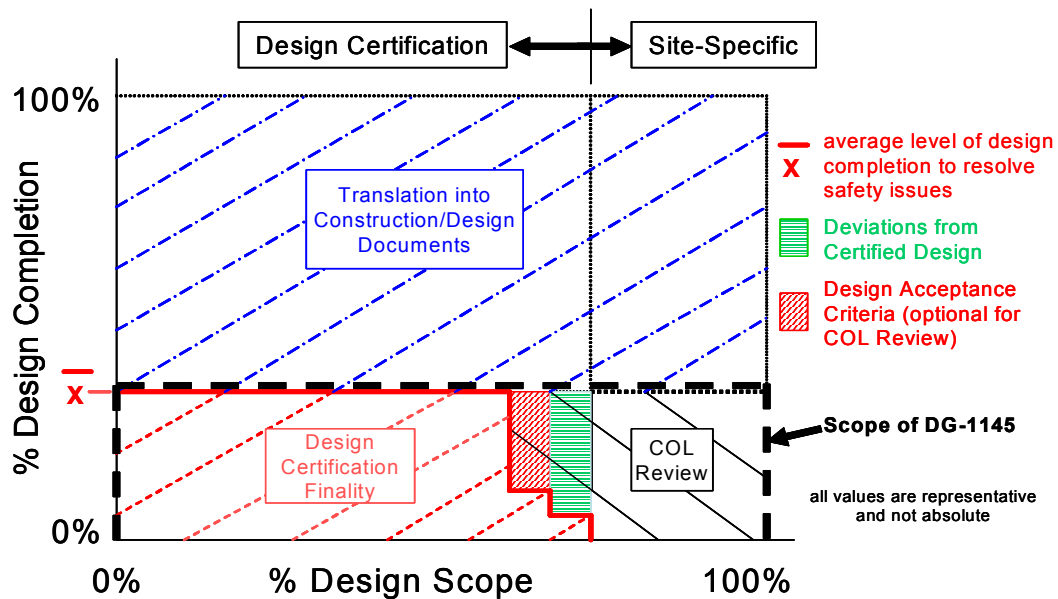
Part II of Section C addresses the information requirements specified in 10 CFR 52.80, “Contents of applications; additional technical information.” In particular, these information requirements include the ITAAC and the environmental report. Use of the guidance in Part II assumes that a COL applicant is submitting a custom design. Parts I and II represent the bulk of the technical information that an applicant should include in a COL application.

Part III of Section C is intended for use by COL applicants who reference either a certified design or both a certified design and an ESP. Part III includes seven sections. Section C.III.1 addresses the topics that the NRC staff will review in a COL application that references a certified design. In contrast, Section C.III.2 covers the remaining review topics for applications that reference both a certified design and an ESP. The staff derived the guidance in both of these sections from information in Part I of this guide. Section C.III.3 addresses the finality of an environmental impact statement (EIS) associated with an ESP. Section C.III.4 provides generic guidance on addressing COL action/information items in COL applications. Section C.III.5 notes recommendations for COL applicants who reference certified designs that include design acceptance criteria (DAC). Section C.III.6 provides recommendations for coordinating the submittal of COL applications with design certifications and/or ESP applications that are under NRC review at the time the COL application is submitted. Section C.III.7 describes a process for developing the additional ITAAC necessary for applications that reference a certified design.

Part IV of Section C includes 9 sections that address a series of miscellaneous topics of interest to COL applicants. Section C.IV.1 furnishes the checklist that the NRC will use to perform its acceptance review of a COL application. Section C.IV.2 provides guidance and recommendations for the format of a COL application, focusing particularly on electronic submissions. Section C.IV.3 offers a general description of the change processes associated with custom COL applications and those that reference a certified design and/or an ESP. Section C.IV.4 provides guidance for use in implementing

SECY-05-0197, “Review of Operational Programs in a Combined License Application and Generic Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria,” dated October 28, 2005. Section C.IV.5 details submittal guidance about the general and financial information that is required to be included in a COL application. Section C.IV.6 provides guidance regarding information to be included in the site redress plan and requests for limited work authorizations (LWA). Section C.IV.7 discusses preapplication activities that the NRC staff and the prospective applicant should perform before an application is submitted. Section C.IV.8 provides information on dealing with generic issues. Section C.IV.9 furnishes guidance on handling the regulatory treatment of nonsafety systems (RTNSS).

Figure below represents the scope of the staff review of a COL application that references a certified design. In such instances, the referenced design may contain the DAC for certain design topics that the COL application review is not required to address; however, the COL application must discuss any departures from the certified design. In addition, the design must be sufficiently complete to enable the NRC staff to reach a final conclusion regarding all safety issues. Consequently, the scope of the staff review encompasses the entire facility. Thus, a COL applicant should not state that the staff should defer a portion of its application review because the information is not available at the time the application is submitted. Rather, the COL applicant should provide sufficient information to enable the staff to reach a safety finding.



**Figure 1: Combined License Application Referencing a Certified Design**

This guide is intended for use by COL applicants who propose to construct and operate light-water reactor (LWR) nuclear power plants. Thus, this guide does not attempt to distinguish between LWRs with active and passive safety systems. Rather, this guide seeks to bound the information needed in a COL application for any LWR. As a result, some of the guidance may not apply to some COL applicants.