C.IV.7 Preapplication Activities

Preapplication activities addressing certain topics with COL applicants before they submit their applications will benefit both the staff and the applicants. The NRC staff collectively calls these interactions "preapplication activities." Despite the inherent benefits, the agency does not require COL applicants to engage in preapplication activities.

Preapplication activities should not focus on what can be done prior to the submission of a COL application. Rather, these interactions should focus on what would be most beneficial to the review, and what would achieve the best and most efficient use of staff and applicant resources. Toward that end, the staff categorizes preapplication activities as (1) those that support the entire COL application, and (2) those that specifically support the environmental review, as discussed in the following sections.

C.IV.7.1 Preapplication Activities that Support the COL Application

C.IV.7.1.1 *COL Applications Referencing a Certified Design*

Preapplication activities that support a COL application referencing a certified design should focus on the following topics:

- potential departures from the certified design
- process and schedule for completing ITAAC associated with the design acceptance criteria
- plans for addressing COL action/information items in the NRC's FSER

C.IV.7.1.2 *COL Applications Referencing an Early Site Permit*

Preapplication activities that support a COL application referencing an ESP should focus on the following topics:

- potential variances from the ESP
- plans for addressing COL action items and conditions in the permit

C.IV.7.1.3 *All COL Applications*

Preapplication activities that support a COL application should focus on the following topics (regardless of whether the application references a certified design or an ESP):

- exemptions from the regulations (other than deviations from the certified design)
- deviations from staff guidance
- potential policy issues
- fabrication schedule for components with long lead times
- schedule for site characterization activities
- plans to request limited work authorization
- other site work to support plant construction
- source of historical site information for geology, meteorology, and socioeconomic data
- quality assurance program
- design reliability assurance program

- analysis needed to support offsite power analysis with reactor trip override
- plans for interfacing with other Federal, State, and local agencies and/or officials
- relationship between the COL application and other licensing activities (such as review of a design certification)

C.IV.7.2 Preapplication Activities that Support the Environmental Review

Preapplication activities that support the environmental review should include early and frequent discussions between the NRC and prospective applicant. Topics should include:

- the status of plans for the project
- activities that have been initiated
- expectations for preapplication activities and application preparation

The preapplication interactions between the applicant and the NRC staff will likely include discussions related to the following areas associated with the environmental review.

C.IV.7.2.1 *Alternative Sites*

Preapplication activities that support the environmental review should include the following interactions related to alternative sites:

- Review the process for selecting the alternative sites and then narrowing the selection to the proposed site.
- Visit the proposed and alternative sites and gather reconnaissance-level information. Identify any issues and concerns related to each site. For existing sites, the site visit may include the transmission corridors.

C.IV.7.2.2 *Preapplication Monitoring*

Preapplication activities that support the environmental review should include the following interactions related to alternative sites:

- Obtain information regarding the applicant's monitoring-related plans, and compare those plans to the NRC's environmental standard review plan guidance in NUREG-1555, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants," to identify any apparent discrepancies.
- Observe the applicant's implementation of portions of the monitoring programs.

C.IV.7.2.3 *Federal, State, Tribal, and Other Entities*

Preapplication activities that support the environmental review should include the following interactions related to Federal, State, Tribal, and other entities:

- Identify the key participants among the external organizations (e.g., cognizant Federal agencies, State agencies, local government officials) at the proposed site.
- Meet with appropriate representatives of external government organizations that have a potential role in the review process. Identify any issues of concern to these organizations, as well as any likely concerns related to the permits that will be required.

C.IV.7.2.4 *Initial Data Collection*

Preapplication activities that support the environmental review should include the following interactions related to initial data collection:

- For selected areas for which data are readily available from existing sources, collect data that will be needed for the review. Examples would include information related to many portions of the socioeconomics review, cultural resources (through the State or Tribal historic preservation officer), and threatened and endangered species (from the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service).
- As sections of the application become available, identify any inconsistencies between these sections and the environmental standard review plan.

C.IV.7.2.5 *Preapplication Public Meetings*

Prospective applicants should be aware that preapplication activities will likely include a public meeting at which the NRC staff will explain the licensing process and opportunities for public involvement, and respond to questions from the public regarding the process.