WordPerfect Document Compare Summary

Original document: P:\RG 1.206 draft\C.III.6.wpd
Revised document: @PFDesktop\:MyComputer\C:\ADAMS\Cache\ML0625000030.wpd
Deletions are shown with the following attributes and color:
~~Strikeout~~, Blue RGB(0,0,255).
Deleted text is shown as full text.
Insertions are shown with the following attributes and color:
Double Underline, Redline, Red RGB(255,0,0).

The document was marked with 84 Deletions, 73 Insertions, 0 Moves.

C.III.6~~.~~ Combined License Application Timing

The regulations in Title 10, Part 52, "Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Plants," of the *Code of Federal Regulations* (10 CFR Part 52) allow submission of combined license (COL) applications that reference a certified design, an early site permit (ESP), both, or neither. The ~~most~~ optimal use of the 10 CFR Part 52 licensing process is to reference both a certified design (i.e., a design that the U.S. Nuclear Regulatory Commission (NRC) has incorporated into the regulations after completing the rulemaking process) and an ESP (i.e., one that the NRC has issued after completing the hearing process). Referencing both a certified design and an ESP will maximize finality~~,~~ while minimizing the remaining issues that must be reviewed in the COL application.

Alternatively, under 10 CFR Part 52, a COL applicant may, at its own risk, submit a COL application that references either a design certification application or an ESP application that has been docketed and is under review by the NRC staff, as follows:

- An applicant for a ~~construction permit or combined license~~COL may, at its own risk, reference in its application a site for which an ~~early site permit~~ESP application has been docketed, but not granted ~~[~~(10 CFR 52.27(c)~~]~~).
- An applicant for a ~~construction permit or combined license~~COL may, at its own risk, reference in its application a design for which a design certification application has been docketed, but not granted ~~[~~(10 CFR 52.55(c)~~]~~).

Sections C.III.1 and C.III.2 of this guide do not explicitly address application timing. Rather, ~~these~~ these sections assume that the COL application references a certified design ~~and a~~and a certified design ~~and granted~~and granted ESP, respectively. Thus, it is important that the applicant ensure that the information contained in the COL application is synchronized with the information contained in both the design certification and ESP applications~~,~~ in case they are revised ~~and supplemented~~and supplemented during the review process.

The following sections provide guidance for applicants that submit COL applications referencing a docketed design certification application and/or a docketed ESP application under review at the time the COL application is submitted. The information contained in all COL applications falls into the following ~~five~~four categories:

(1) ~~F~~final ~~S~~safety ~~A~~analysis ~~R~~report (FSAR), including the technical specifications
(2) ~~Probabilistic Risk Assessment (PRA)~~
~~(3) I~~inspection, ~~T~~test, ~~Analyses~~analysis, and ~~A~~acceptance ~~C~~criteria ~~(ITAAC)~~
(3) ~~E~~environmental ~~R~~report
(4) ~~G~~general and ~~F~~financial information

C.III.6.1 *COL Applications Referencing a Design Certification Application Under Review*

~~A d~~Design certification ~~application includes~~applications have included the following four types of documents:

(1) ~~D~~design ~~C~~control ~~D~~document (DCD), which contains both Tier 1 and Tier 2 information

(2) ~~T~~topical ~~R~~reports, which are referenced in Tier 2 of the DCD~~,~~ and are either already approved~~,~~ or will be reviewed and approved as part of the design certification review

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(3) ~~Probabilistic Risk Assessment (~~PRA~~)~~

(4) ~~S~~safeguards ~~i~~information (SGI)

The applicant submits the DCD, PRA, and SGI~~ are submitted~~ to the NRC as part of the design certification application. The NRC performs an acceptance review of the application, in accordance with the requirements of 10 CFR 2.101, "Filing of Application." The staff also anticipates ~~that the applicant~~that the design certification applicant will update all three of these documents during the course of the design certification review.

The NRC also anticipates that applicants will reference topical reports in their COL applications. Applicants should generally submit ~~some of~~ these reports for NRC review prior to submission of the COL application~~, and all referenced topical reports should be submitted by the time the COL application is submitted. Absence of a topical report would likely constitute a gap in the information needed to review a COL application.~~ If, for some reason, a COL applicant cannot provide a referenced topical report, the application should provide a summary of the report~~,~~ as well as its completion schedule~~,~~ to enable the staff to assess the impacts of the missing information with regard to docketing the application and establishing the review schedule.

The staff also recommends that the COL application reference and include specific revisions of ~~both~~ the DCD ~~and the PRA~~ that ~~are~~is currently under review by the staff. ~~For additional~~Section C.IV.2 of this guide provides additional submittal guidance~~, see Section C.IV.2 of this guide~~.

The staff will likely limit its review of the COL application~~ will be limited~~ to the topics not covered in the ongoing design certification review. Thus, ~~it is the responsibility of~~ the applicant ~~to ensure~~is responsible for ensuring that it updates its COL application~~ is updated~~ to reflect all changes that have been necessitated by findings in the design certification review. The staff also recommends that subsequent updates to the COL application reference and include specific versions of the DCD~~ and PRA~~. In addition, the applicant should update references to topical reports and SGI~~ should be updated~~ as appropriate.

~~It is~~The agency anticipate~~d~~s that the staff will issue a safety evaluation report (SER) with open items for a given design certification review. The staff plans to document closure of the open items in one or more supplemental SERs. ~~R~~The staff will initiate rulemaking~~ will be initiated~~ after issuance of the final supplemental SER. For COL applications that are submitted after the staff issues the SER with open items, the applicant may choose to reference in its FSAR the specific versions of the DCD ~~and PRA~~ that are referenced in that SER. Doing so ensures coordination with the COL review~~,~~ as well as a specific set of open issues in the design certification review.

C.III.6.2 *COL Applications Referencing an Early Site Permit Application Under Review*

C.III.6.2.1 Early Site Permit

The ESP application consists of the following four types of documents:

(1) ~~S~~site ~~S~~safety ~~A~~analysis ~~R~~report (SSAR)

(2) ~~T~~topical reports, which are either already approved or are reviewed and approved as part of the ESP review

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(3) ~~E~~environmental ~~R~~report (discussed in Section C.III.6.2.2 of this guide)

(4) ~~S~~site ~~R~~redress ~~P~~plan, which is included in the environmental report ~~(applicable only if applicant is requesting a limited work authorization)~~

The NRC staff will perform an acceptance review of the ESP application under the requirements of 10 CFR 2.101. The staff also anticipates that the applicant will update both the SSAR and many of the referenced topical reports during the ESP review. For that reason, the staff recommends that the COL application reference and include a specific revision of the SSAR that is currently under review by the staff.

The information that is included in the COL application is dependent on the scope of the ESP. ~~It is the responsibility of t~~The applicant ~~to ensure~~is responsible for ensuring that its COL application reflects all changes that have been necessitated by ESP review findings. Toward that end, the staff recommends that subsequent updates to the COL application reference and include a specific version of the SSAR, topical reports, and ER.

~~It is~~The agency anticipate~~d~~s that the staff will issue an SER with open items for a given ESP review prior to issuing the final SER and the subsequent permit. For COL applications that are submitted after the staff issues the SER with open items, the applicant may choose to reference in its ~~SAR~~safety analysis report the specific versions of the SSAR that ~~is~~are referenced in that SER. Doing so ensures coordination with the COL review~~,~~ as well as a specific set of open issues in the ESP review.

~~**C.III.6.2.2 Environmental Report**~~

~~The provisions of 10 CFR 52.80(c) specify that the COL application shall contain a complete environmental report, as required by 10 CFR 51.50(c). Additional guidance will be provided when the final Part 52 rule is issued.~~

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