

## Consistent Radioactive Effluent Program Descriptions in COL Applications

### Background

- At the June 13, 2007 ESBWR Design Centered Working Group (DCWG) meeting, industry presented a proposal for the radiological effluent program descriptions in the COL applications that incorporated much of the site specific information that the staff was looking for.
- A concern was later raised at this meeting that the amount of information being requested by the NRC staff could not be consistently provided for all COL applications and was inconsistent with other operational programs.
- NRC staff committed to review this to ensure consistency with Commission policy and other operational programs

### NRC Resolution

- Commission paper SECY 05-0197, states that (1) certain operational programs should be fully described in the COL application, (2) ITAAC will not be used for these programs, and (3) the COL will have a license condition commitment to have these programs implemented by a certain time prior to fuel load.
- The SRM for SECY 02-0067 stated that the burden is on the applicant to provide the necessary and sufficient programmatic information for approval of the COL without programmatic ITAAC.
- The SRM for SECY 04-0032, stated that fully described means that the program is clearly and sufficiently described in terms of scope and level of detail to allow a reasonably assurance finding. Programs should be described at a functional level and at an increased level of detail where implementation choices could materially and negatively affect the program effectiveness and acceptability.
- NRC acknowledges that a consistent standard must be established for the level of detail for these programs, and that the extent to which these programs can be fully described may vary from "green-field" sites to COL applications co-located with currently operating power reactors.
- To address this, NRC proposes that the industry submit as a topical report a template that fully describes each of the four radiological effluent programs (ODCM, RETS, REMP, PCP).
- These templates should provide an approach that can be consistently applied by all applicants and vendor types.
- NRC will review and pursue changes to these templates through the licensing process, and issue an SER so that the template and SER provide guidelines for an acceptable full description of these programs as part of the COL application.
- The COL will contain a license condition for completing and implementing these programs prior to fuel load. NRC staff will inspect the implementation of these programs through the Construction Inspection Program