

# IMC 2501 – Early Site Permit (ESP)

- Revised to address Part 52 rulemaking (e.g., applicability of Appendix B and Part 21)
- Objectives
  - Verifies that information in ESP application meets requirements of Subpart A of Part 52
  - Verifies implementation of the quality assurance (QA) program described in the ESP application
  - Provides guidance for audit of geotechnical and foundation activities to verify that data and test activities are governed by adequate QA controls
- Inspections begin when NRC is formally notified that an applicant is preparing an application for an ESP.

# IMC 2501 - ESP

- Four inspection procedures (IPs) implementing the requirements of IMC 2501 verify that an adequate QA program governs the data and test activities supporting the ESP application.
- The four IPs are common to both IMC 2501 and 2502.
- The inspection work related to IMC 2501 will continue to be applied during the review process until the NRC decides to issue an ESP.

# IMC 2502 – Pre –Combined License (Pre-COL) Phase

- Revised to address two part application, added flexibility on timing of audits and inspections, and clarified roles and responsibilities.
- Objectives
  - Verifies that the information in the COL is accurate and that the technical, quality, and administrative requirements are implemented during the design and construction of a nuclear power plant
  - Verifies implementation of the QA program described in the COL application
  - Provides guidance for the early inspection and review of licensee design engineering that was not covered as part of the design certification process. Included in this is the assessment of First-of-a-Kind (FOAK) Engineering.
- Audits in support of a COL begin when the NRC is notified of the intent to apply for a COL and when sufficient work has been completed on the application to justify an audit. Audit scope includes a completeness review of the application in accordance with Regulatory Guide 1.206.

# IMC 2502 – Pre-COL Phase

- Four IPs implementing the requirements of IMC 2502 verify that an adequate QA program governs the data and analyses supporting the COL application. Five IPs are applicable if the COL application does not reference an ESP.
- IPs focus on quality assurance, FOAK engineering, and Part 21 programs.

# IMC 2502 – Pre-COL Phase

- Inspections will continue through the receipt of a COL application and will end when the NRC decides whether or not to issue a license.
- FOAK Engineering inspection could be a challenge and may occur during the inspections conducted under IMC 2504 instead of IMC 2502.