

# Nuclear Regulatory Commission Office of New Reactors NRO Office Instruction

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Office Instruction: **NRO-REG-300**

Office Instruction Title: **Maintaining and Updating the Standard Review Plan**

Revision Number: **0**

Effective Date: **November 06, 2008**

Primary Contact: **Ram Subbaratnam, NRO/DNRL**

Responsible Organization: **NRO/DNRL/NGRA**

**Summary:** This initial issuance of NRO-REG-300, "Maintaining and Updating the Standard Review Plan," is to provide guidance by which the Office of New Reactors will maintain and update the Standard Review Plan sections. The Standard Review Plan is a key guidance document used by staff for reviews of operating reactor licensing actions, applications for Combined Licenses, Early Site Permits, Design Certifications and other staff licensing activities performed in Office of New Reactors and the Office of Nuclear Reactor Regulation.

Training: NONE

ADAMS Accession No.: ML073230703

Concurrences			
Primary Office Owner	Rulemaking, Guidance and Advanced Reactors Branch		
Primary Contact	Ram Subbaratnam		07/24/08
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Deputy Director	DNRL/NRO	PMadden	08/06/08
Division Director	DPR/NRR	MCase	09/09/08
Executive Director	ACRS	EHackett	09/11/08
CRGR Chairman	CRGR	JLyons (via e-mail)	08/04/08
OGC	OGC	KWinsberg	08/14/08
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# NRO Office Instruction NRO-REG-300

## Maintaining and Updating the Standard Review Plan

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### 1. **PURPOSE**

The purpose of this Office Instruction (OI) is to provide guidance by which the Office of New Reactors (NRO) will maintain and update the Standard Review Plan (SRP) sections in coordination with the Office of Nuclear Reactor Regulation (NRR). The SRP provides guidance to NRO and NRR staff in performing their safety reviews of various licensing actions related to both operating and new reactors, including applications for licenses, Early site Permits (ESPs), Design Certifications (DCs), and amendments thereto. The SRP is published as NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," and is available to the public in accordance with the NRC's policy to inform industry and public stakeholders of regulatory procedures and policies.

### 2. **REQUIREMENTS**

#### 2.1 Organization Review Responsibility for SRP Sections

NRO retains the lead responsibility for the maintenance of the SRP, coordinating activities with NRR, as appropriate. The SRP sections are assigned to the technical branch that has the primary responsibility for the related technical subject matter. In some cases, the SRP section subject matter may overlap into other technical branch review areas. In these cases, primary and secondary technical branches are assigned. The primary technical branch has the responsibility to evaluate the effectiveness of the SRP section, and to initiate changes when needed to correct errors, clarify topics, or adopt revised staff positions.

Changes to SRP sections may be proposed by branch chiefs if the changes are administrative in nature to correct errors, clarify topics and not involve changes to previous staff positions. But all changes to primary and secondary branch assignments that involve substantial revision to previously approved staff positions require the approval of the NRO division directors, as appropriate. A table of organizational review responsibilities is available in the Agencywide Documents Access and Management System (ADAMS) under Accession Numbers ML081021189. This table has been revised appropriately to align with the primary and secondary review branches shown in the SRP, and has been reconciled with the list used by the Planning and Scheduling Branch (NPLS) for electronically loading into the Enterprise Project Management (EPM). The primary contact for this OI is responsible for maintaining this assignment document, and will update it as changes occur.

#### 2.2 SRP Format

NRR's OI LIC-200, "Standard Review Plan (SRP) Process," was used as the guiding

document in performing the March 2007 revision to the SRP NUREG-0800. The SRP was originally written for Title 10 of the *Code of Federal Regulations* Part 50 (10 CFR Part 50) license applications. The current revision to the SRP expanded its applicability to various licensing processes under 10 CFR Part 52 for new reactor applicants. As such, depending on the license application being pursued, each SRP section may delineate applicable differences in the review scope. For DC and COL applications submitted under 10 CFR Part 52, the level of design information reviewed should be consistent with that of a final safety analysis report (FSAR) submitted in an operating license (OL) application. However, verification that the as-built facility conforms to the approved design is performed through the inspection, test, analysis, and acceptance criteria (ITAAC) verification process.

### 2.3 Organization of SRP Sections

**Review Responsibilities:** This subsection identifies the primary, and as applicable, secondary review functions. The SRP sections were organized as described below, and the update process as described in this OI will retain the organizational structure of the March 2007 update as follows:

#### **I. Areas of Review**

The areas of review subsection describe the scope of review by the branch/branches having primary and secondary review responsibilities for the identified functional areas. Specifically, this subsection contains a description of the systems, components, analyses, data, or other information that is reviewed as part of the particular Safety Analysis Report (SAR) section.<sup>1</sup> It also contains a discussion of the information needed or the review expected from other branches to permit the primary review branch to complete its review, as well as a list of applicable interfacing sections. The secondary branches are those that necessitate independent secondary reviews as different from the primary review and lead to a secondary input to the safety analysis. If multiple branches are indicated for primary and secondary areas of review, all branches are listed separately.

#### **II. Acceptance Criteria**

The acceptance criteria subsection identifies the applicable NRC requirements including specific regulations, orders, and industry codes and standards referenced by regulations. For new reactor license applications submitted under Part 52, the applicant is also required to address the proposed technical resolution of unresolved safety issues (USIs) and medium- and high-priority generic safety issues (GSIs) that are identified in the version of NUREG-0933 current on the date 6 months before application and that are technically relevant to the design; and demonstrate how the operating experience insights have been incorporated into the plant design.<sup>2</sup>

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<sup>1</sup> Certain SRP sections address review guidance for supplemental information submitted outside the scope of the SAR. For example, the application must contain emergency plans pursuant to 10 CFR 52.79.

<sup>2</sup> Applications must incorporate the operating experience as addressed in a Staff Requirements

This subsection also identifies the staff positions that have been determined to provide an acceptable approach for satisfying the applicable requirements. The types of guidance documents include, but are not limited to: Regulatory Guides (RGs), Commission policy as described in SRMs on SECY papers, NRC-approved or endorsed industry codes and standards, certain technical reports (e.g., NUREGs and topical reports and corresponding safety evaluations), and Branch Technical Positions (BTPs),<sup>3</sup> which are provided as appendices to the SRP. BTPs typically set forth solutions and approaches previously determined to be acceptable by the staff in dealing with a similar safety or design matter. These solutions and approaches are documented in this form so that staff reviewers can take uniform and well-understood positions as similar matters arise in the review of other applications.

Lastly, this subsection also contains, as necessary, the technical bases for applicability of the requirements to the subject areas of review, or relationship of regulatory guidance to the associated requirement.

### **III. Review Procedures**

This subsection discusses how the review is accomplished. The subsection is a step-by-step procedure to be implemented by the reviewer to obtain reasonable assurance that the applicable regulatory requirements have been met. These review procedures are based on the identified SRP acceptance criteria. For deviations from these specific acceptance criteria, the staff should review the applicant's evaluation of how the proposed alternatives to the SRP criteria provide an acceptable method of complying with the relevant NRC requirements identified in specific review areas. For new reactor license applications submitted under Part 52, this subsection should address staff review procedures for how operating or equivalent international experience insights have been incorporated into the plant design.

### **IV. Evaluation Findings**

This subsection presents the type of conclusion that is sought for the particular review area. For each SRP section, the staff's conclusion is incorporated into a published Safety Evaluation Report (SER). The SER describes the review and the aspects of the

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Memoranda (SRM), dated February 15, 1991, on SECY-90-377, "Requirements for Design Certification under 10 CFR Part 52," (for DC applicants), and the SRM dated February 22, 2006, on SECY-05-197, "Review of Operational Programs in Combined License Applications and Generic Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria." Consistent with this guidance, the staff will review and obtain a reasonable assurance finding on the program and its implementation schedule. In addition, the staff will include a license condition on subsequent implementation milestones for each program for which specific implementation requirements are not specified in the regulations. In lieu of the implementation schedule the applicant may propose ITAAC for the program.

<sup>3</sup> To the extent practical, references to BTPs should describe critical assumptions or guidance necessary for a comprehensive review of the technical area, and should be referenced for additional details. With the March 2007 SRP revision issued for the COL applicants most of the BTPs from the 1996 draft version were revised, and reformatted to include changes to position titles.

review the staff emphasized, and identifies: (1) the changes the applicant made to the application; (2) the matters addressed by additional information; (3) the matters for which additional information is expected to be forthcoming; (4) the matters remaining unresolved; and (5) deviations from the SRP in design and operational programs, and the bases for the acceptability of such deviations. The SER also clearly identifies any requested exemptions from the regulations and the staff's basis for its determinations on these requests.

## **V. Implementation**

This subsection provides guidance to applicants and licensees regarding the NRC's plans for using the SRP section. Section 50.34(h) of 10 CFR, and similar provisions in 10 CFR Part 52 require each application to include an evaluation of the facility against the SRP of record 6 months prior to docketing, including all differences between the design features, analytical techniques, and procedural measures proposed for a facility and those in the SRP acceptance criteria.

While the applicant's evaluation is performed against the SRP in effect 6 months prior to the docket date of the application, the NRC staff will use the SRP in effect at the time of the application review.

## **VI. References**

This subsection lists the references used in the review process.

### **2.4 Scope of Review of Part 52 License Applications (Initial Applications and Amendments)**

The SRP provides pertinent review guidance to the staff for review of new license applications submitted under 10 CFR Part 52. This includes ESP, DC, COL, standard design approval (SDA), and manufacturing license (ML) applications. The SRP sections applicable to a COL application for a new light-water reactor (LWR) are consistent with RG 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)." Furthermore, RG 1.206 delineates different content based on whether the COL application references a DC, a DC and ESP, or neither. In general, review of a SDA or a ML application will be similar to that of a DC. Furthermore, the review of a limited work authorization will be determined by the scope of activities covered in the application.

Because the staff's review constitutes an independent audit of the applicant's analysis, the staff may emphasize or de-emphasize particular aspects of an SRP section, as appropriate, for the application being reviewed. Prior to the initiation of a review, the technical branch chief and assigned reviewer establish the scope and depth of the review to be performed, including the use of acceptance criteria and review guidelines to be used. In some cases, the staff may propose justification for not performing certain reviews called for by the SRP. These areas of increased or decreased emphasis are acceptable, if the reviewer has management approval and documents the scope and depth of the review in the SER. Examples of acceptable variations in the scope of a review include reduced emphasis on design reviews where the design and its underlying conditions of acceptance are identical to those of another unit that was recently reviewed and approved, or increased emphasis on certain aspects of the design review

as a result of recent operating experience or consideration of unique design features that are not addressed in the SRP. Risk insights can also be used in determining the depth of review. The staff should generally limit its review of a proposed amendment to a COL to those parts of the SRP that are directly affected by the proposed change.

For the review of COL applications, specific sections of the SRP will be used to review operational programs. The review will be performed consistent with guidance as endorsed in the SECY-05-0197, "Review of Operational Programs in a Combined License Application and Generic Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria," and as endorsed in the related SRM dated February 22, 2006. Consistent with this guidance, the staff will review and reach a reasonable assurance finding on the program and its implementation schedule. In addition, the staff will include a license condition on subsequent implementation milestones for each program for which specific implementation requirements are not specified in the regulations. In lieu of the implementation schedule, the applicant may propose ITAAC for the program.

## 2.5 Deviation from the SRP by Applicants

It should be noted that the SRP is not a substitute for the NRC regulations, and compliance with them is not required. Because the SRP generally describes an acceptable means of meeting the regulations, but not necessarily the only means, applications may deviate from the acceptable criteria in the SRP. However, applicants are required per 10 CFR 52.79 to identify differences from the SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide an acceptable method of complying with the NRC regulations. The evaluation must include an identification and description of all differences in design features, analytical techniques, and procedural measures proposed for a facility; and those corresponding features, techniques, and measures given in the SRP acceptance criteria. Where such a difference exists, the evaluation must discuss how the proposed alternative provides an acceptable method of complying with the rules or regulations of the Commission, or portions thereof that underlie the corresponding SRP acceptance criteria.

If an application deviates from the SRP acceptance criteria, staff should review the applicant's evaluation of each deviation and make an explicit finding in the appropriate sections of the SER of how the proposed alternatives meet the applicable regulations.

In addition, certain identified SRP acceptance criteria are not readily applicable to new LWR designs that use simplified, inherent, passive, or other innovative means to accomplish their safety functions.

The staff should evaluate deviations taken by applicants as part of the review process but should also consider whether the deviations identify the need to revise the SRP. If the deviation is considered an isolated case associated with a specific application, an update or revision may not be appropriate. However, if the deviation is expected to be adopted by numerous applicants, a change to the SRP would be appropriate to avoid repeated justifications for the deviation from a possibly outdated review standard.

## 2.6 Revising the SRP

### 2.6.1 Updating the SRP

The SRP is intended to be a living guidance document and should be continually evaluated and updated to facilitate staff reviews and capture staff positions and review practices. These updates typically arise from changes in staff guidance, changes to the regulations or Commission policy, or to incorporate changes issued as Interim Staff Guidance (ISG). The current agency practice is to maintain the latest SRP guidance in ADAMS and on the NRC Web at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr0800/>. The SRP is updated on a section-by-section basis in order to maintain the review guidance in a timely manner.

The need to revise an SRP section (including the need to create new SRP sections) will usually be identified by technical branches as a result of ongoing reviews or other interactions related to designs, applications, or operating events. Possible changes might also be identified by current licensees or applicants, future applicants during pre-application interactions, or other NRC organizations working on applications or technical subjects.

The primary technical branch for a specific SRP section has the lead responsibility for the technical content and guidance provided in that section. As such, the primary technical branch should be informed of any technical concern or possible enhancement to the affected SRP section(s). Notifications to the primary technical branch can be accomplished via memorandum, e-mail, or through the Rulemaking, Guidance, and Advanced Reactor Branch (NRGA) of the Division of License Renewal (DNRL) in NRO, via the rulemaking and guidance SharePoint page or NRO corrective action program (when available).

Primary review branches should inform DNRL/NRGA of planned updates or revisions to specific SRP sections to help in the coordination and issuance of actual changes to SRP sections.

Upon developing a proposed update to an SRP section, the primary review branch transmits the proposed revision(s) to the NRGA branch with the changes appropriately highlighted with revision bars suitable for processing the document in ADAMS, so that the revisions are readily identifiable. These changes are also required to be documented with a SRP Change Summary sheet (see exhibit).

The staff should consider the following guidance when updating the SRP:

1. Branches with SRP section review responsibility should not expand the criteria of any specific SRP section without management approval. The staff should be particularly sensitive to actions they initiate that may constitute a departure from a previous position. This includes new or modified interpretations of existing rules or regulations, as well as new or revised guidance that differ from that set forth in GLs, Bulletins, SERs, RGs, or applicable sections of the SRP, including BTPs and Appendices. The staff should, however, consider other factors such as the desire to support standardization, the linkages between licensing

documents (design certification documents (DCDs) and COLAs, reference and subsequent COLAs, etc.), and the cost/benefit implications before pursuing a change to the review guidance in the SRP.

2. If a staff member believes that protection of the public health and safety, or the common defense and security necessitates a more stringent position in the SRP, the staff member should, to the extent that the staff position may constitute a position that is either new or different from a previous staff position applicable to a specific COL application or an operating reactor, promptly identify the potential backfit to management.

#### 2.6.2 Adding a New SRP Section

When there is a source document that necessitates the need to develop a new SRP section, the responsible technical organization identifies the source, *e.g.*, promulgation of new regulation or proposed technical resolution of USI or GSI, and the justification for the new section. This justification requires Division Director approval.

Note: New SRP sections issued in final are subject to the Congressional Review Act (formerly known as the Small Business Regulatory Fairness Act). Procedural guidance for this is provided in Appendix F to NUREG/BR-0053, "NRC Regulations Handbook."

#### 2.6.3 Withdrawing an SRP Section

The technical branch with primary review responsibility for an SRP section may propose to withdraw the section. To do so, the branch will provide justification for withdrawing the section to the appropriate Division Director(s) for concurrence. The primary contact to this OI is responsible for performing the necessary steps for withdrawing the section from the SRP.

#### 2.6.4 Maintaining an SRP Section

Starting October 1, 2008, the technical branch with primary review responsibility for an SRP section is responsible for reviewing the technical content of the assigned SRP section on a biennial basis. If the biennial review determines that an SRP section needs updating, the primary technical branch responsible for the SRP section should inform DNRL/NRGA and initiate the update process as described above. The primary technical branch responsible for a given SRP section should inform the appropriate division director and DNRL/NRGA if the review has been completed and if the branch has determined that no changes are warranted. If the primary technical branch responsible for a given SRP section is not able to meet the biennial and update schedule, the branch is responsible for informing its Division Director and DNRL/NRGA.

#### 2.6.5 Office of the General Counsel (OGC) Review

Review and concurrence (statement of no legal objection) by OGC is required on all new and updated sections of the SRP when issued for public comment, and when issued in final form. DNRL/NRGA coordinates the review of the SRP revision with OGC.

### 2.6.6 Office of Nuclear Reactor Regulation (NRR)

The primary review branch evaluating or pursuing changes to an SRP section is encouraged to communicate and coordinate its activities with the corresponding technical branch in NRR. Early interactions are the most effective way to coordinate activities and reach a consensus view on possible changes. DNRL/NRGA will, if it affects NRR, seek NRR concurrence on changes to specific SRP sections unless NRR concurrence was obtained by the NRO primary review branch during the development of the revision.

### 2.6.7 Advisory Committee on Reactor Safeguards (ACRS) Review

DNRL/NRGA will forward the proposed changes to SRP sections, to the ACRS via a memorandum when they are issued for public comment. A similar memorandum will be used to forward to the ACRS the final issuance of an SRP revision following disposition of public comments, incorporation of final ISGs, or the incorporation of editorial/administrative changes. The ACRS, or ACRS staff, may request additional interactions with the staff regarding changes (proposed or final) to determine if the new revision is to be added to the ACRS agenda. DNRL/NRGA will, as necessary, coordinate interactions between the NRO staff and ACRS regarding the maintenance and updating of SRP sections.

### 2.6.8 Committee to Review Generic Requirements (CRGR) Review

DNRL/NRGA will forward the proposed changes to SRP sections to the CRGR via a memorandum when they are issued for public comment. A similar memorandum will be used to forward to the CRGR the final issuance of an SRP revision following disposition of public comments, incorporation of final ISG, or the incorporation of editorial and administrative changes. The CRGR, or CRGR staff, may request additional interactions with the staff regarding changes to determine if a new subject is added to the committee's agenda or the change is to enhance or provide clarity to the guidance documents. DNRL/NRGA will, as necessary, coordinate interactions between the NRO staff and CRGR regarding the maintenance and updating of SRP sections.

### 2.6.9 Publishing an SRP Section for Public Comment

Subsequent to getting appropriate concurrences (including OGC and NRR), new or updated SRP sections that involve changes other than editorial or administrative, should be published for public comment with notices issued in the *Federal Register* (FR) and NRC website. SRP updates to incorporate ISG may forego this step provided that public comments were sought and resolved through the ISG process (see NRO-REG-301). Revised or new SRP sections may be prepared and routed for concurrence with the associated *Federal Register* Notice (FRN) (a template is available from DNRL/NRGA); or via a memorandum from the primary review branch, through the appropriate division director(s), to DNRL/NRGA (in which case DNRL/NRGA would prepare the FRN and obtain, as necessary, any remaining concurrences).

The comment period for SRP sections is usually 60 days. The SRP section(s) made available for public comment should be provided to the ACRS and CRGR via a memorandum from DNRL/NRGA.

#### 2.6.10 Resolving Public Comment

The branch with primary review responsibility for an SRP section considers and addresses public comments typically within 60 days of receipt depending on the nature of the comments. If warranted to resolve issues or concerns, the staff may elect to have meetings as part of the resolution of public comments and may issue revised draft SRP sections to provide an opportunity for additional public comments.

#### 2.6.11 Issuing Final SRP Revision

Following resolution of public comments, the final SRP section(s) is routed for concurrences (including OGC and NRR). The resolution of public comments should be described in the change history page, or a separate document preserved as an official agency record and referenced (via ADAMS accession number) in the change history page. Final versions of SRP sections may be prepared and routed for concurrence with the associated FRN (a template is available from DNRL/NRGA), or via a memorandum from the primary review branch, through the appropriate division director(s), to DNRL/NRGA (in which case DNRL/NRGA would prepare the FRN and obtain, as necessary, any remaining concurrences). The availability of the revised SRP section(s) should be noticed in the FR and the section(s) should be posted on the NRC website. The SRP section(s) should be provided to the ACRS and CRGR via a memorandum from DNRL/NRGA.

### 3.0 **ROLES AND RESPONSIBILITIES**

The process is administered and controlled by DNRL/NRGA.

The following subsections define the responsibilities and authorities of NRR staff.

#### 3.1 Primary Review Branch

Organization with SRP section primary review responsibility (the technical review branch with primary review responsibility for SRP section), updates SRP section in accordance with the procedures in this OI. The primary reviewer branch determines the type of revision (see Attachment 1) and maintains technical content even when another NRR branch or NRC office performs the majority of the update. If applicable, the branch coordinates activities pertaining to updated or new SRP section(s) with the secondary review branch, and ensures secondary responsibility is clearly defined within the SRP section(s). It also reviews SRP section(s) to ensure integration of the inspection program procedures for which it has primary responsibility. While there is currently no direct reference from a specific SRP section to a corresponding inspection procedure, there are two relevant inspection manual chapters (IMC), specifically, IMC-2503, "Construction Inspection Program: Inspections, Tests, Analyses, and Acceptance Criteria," and

IMC-2504, "Construction Inspection Program: Non-ITAAC Inspections."

### 3.2 Secondary Review Branch

Organization with SRP Section secondary review responsibility updates SRP section(s) in accordance with the procedures in this OI, and maintains technical content for applicable portion of the SRP. It also coordinates activities pertaining to updated or new SRP section(s) with the primary review branch of the SRP section(s). It ensures responsibility is clearly defined within the SRP section(s) and reviews SRP section(s) to ensure integration of the inspection program procedures. This is performed through the primary responsible organization.

### 3.3 Primary Contact of this OI

The Primary Contact is responsible for establishing and maintaining infrastructure to support the following: Issuance of TAC numbers, SRP update and status tracking, maintaining of records and web site, and providing general support and coordination to develop new or revised SRP sections.

### 3.4 Division Director for Organization with Primary Review Responsibility

The primary SRP section review branch division director approves new or revised SRP sections. He/She identifies the priority of new and updated SRP sections and obtains the necessary resources to ensure that the new or updated sections are completed according to schedule.

### 3.5 Other Support Agency Entities

The other entities involved in concurrence and approval process are OGC, ACRS and CRGR. These entities ensure that the issued SRP sections are consistent with current rules, and authoritative statements of agency policy are legally defensible.

ML070380184 - Exhibit 2 w/Conforming Changes - Updated 03/24/2007 **NUREG-0800**

**U.S. NUCLEAR REGULATORY COMMISSION**  
**STANDARD REVIEW PLAN**

**### TITLE**



**REVIEW RESPONSIBILITIES**

**Primary - Organization responsible for the review of [insert function]**

<b>A</b>	<b>Secondary - Organization responsible for [insert function]</b>
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**I. AREAS OF REVIEW**

[Introductory paragraph]

The specific areas of review are as follows:

[Identify the areas]

<b>B</b>	<p>For ITAAC add:</p> <p><u>Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)</u>. For design certification (DC) and combined license (COL) reviews, the staff reviews the applicant's proposed ITAAC associated with the structures, systems, and components (SSCs) related to this SRP section in accordance with SRP Section 14.3, "Inspections, Tests, Analyses, and Acceptance Criteria." The staff recognizes that the review of ITAAC cannot be completed until after the rest of this portion of the application has been reviewed against acceptance criteria contained in this SRP section. Furthermore, the staff reviews the ITAAC to ensure that all SSCs in this area of review are identified and addressed as appropriate in accordance with SRP Section 14.3.</p>
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Revision # - March 2007

**USNRC STANDARD REVIEW PLAN**

This Standard Review Plan, NUREG-0800, has been prepared to establish criteria that the U.S. Nuclear Regulatory Commission staff responsible for the review of applications to construct and operate nuclear power plants intends to use in evaluating whether an applicant/licensee meets the NRC's regulations. The Standard Review Plan is not a substitute for the NRC's regulations, and compliance with it is not required. However, an applicant is required to identify differences between the design features, analytical techniques, and procedural measures proposed for its facility and the SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide an acceptable method of complying with the NRC regulations.

The standard review plan sections are numbered in accordance with corresponding sections in Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants (LWR Edition)." Not all sections of Regulatory Guide 1.70 have a corresponding review plan section. The SRP sections applicable to a combined license application for a new light-water reactor (LWR) are based on Regulatory Guide 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)."

These documents are made available to the public as part of the NRC's policy to inform the nuclear industry and the general public of regulatory procedures and policies. Individual sections of NUREG-0800 will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience. Comments may be submitted electronically by email to [NRR\\_SRP@nrc.gov](mailto:NRR_SRP@nrc.gov).

Requests for single copies of SRP sections (which may be reproduced) should be made to the U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Reproduction and Distribution Services Section, or by fax to (301) 415-2289; or by email to [DISTRIBUTION@nrc.gov](mailto:DISTRIBUTION@nrc.gov). Electronic copies of this section are available through the NRC's public Web site at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr0800/>, or in the NRC's Agencywide Documents Access and Management System (ADAMS), at <http://www.nrc.gov/reading-rm/adams.html>, under Accession # MLxxxxxxx.

<b>C</b>	<p>For design certification/combined license application reviews add (unless directed this should apply to all Exhibit 2 sections):</p> <p><u>COL Action Items and Certification Requirements and Restrictions.</u> For a DC application, the review will also address COL action items and requirements and restrictions (e.g., interface requirements and site parameters).</p> <p>For a COL application referencing a DC, a COL applicant must address COL action items (referred to as COL license information in certain DCs) included in the referenced DC. Additionally, a COL applicant must address requirements and restrictions (e.g., interface requirements and site parameters) included in the referenced DC.</p>
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<b>D</b>	<p>For operational programs add:</p> <p><u>Operational Program Description and Implementation.</u> For a COL application, the staff reviews the [specify applicable operational program] program description and the proposed implementation milestones. The staff also reviews final safety analysis report (FSAR) Table 13.x to ensure that the [specify applicable operational program] and associated milestones are included.</p>
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Review Interfaces

Other SRP sections interface with this section as follows:

1. [insert]
2. etc...

<b>E</b>	<p>For operational programs add:</p> <p>For COL reviews of operational programs, the review of the applicant’s implementation plan is performed under SRP Section 13.4, “Operational Programs.”</p>
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The specific acceptance criteria and review procedures are contained in the referenced SRP sections.

II. ACCEPTANCE CRITERIA

Requirements

Acceptance criteria are based on meeting the relevant requirements of the following Commission regulations:

1. [insert applicable requirements]
2. etc...

<b>F</b>	<p>For ITAAC add:</p> <p>10 CFR 52.47(b)(1), which requires that a DC application contain the proposed inspections, tests, analyses, and acceptance criteria (ITAAC) that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a plant that incorporates the design certification is built and will operate in accordance with the design certification, the provisions of the Atomic Energy Act, and the NRC's regulations;</p> <p>10 CFR 52.80(a), which requires that a COL application contain the proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will operate in conformity with the combined license, the provisions of the Atomic Energy Act, and the NRC's regulations.</p>
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#### SRP Acceptance Criteria

Specific SRP acceptance criteria acceptable to meet the relevant requirements of the NRC's regulations identified above are as follows for the review described in this SRP section. The SRP is not a substitute for the NRC's regulations, and compliance with it is not required. However, an applicant is required to identify differences between the design features, analytical techniques, and procedural measures proposed for its facility and the SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide acceptable methods of compliance with the NRC regulations.

1. [insert applicable requirements]
2. etc...

<b>G</b>	<p>For operational programs add:</p> <p><u>Operational Programs</u>. For COL reviews, the description of the operational program and proposed implementation milestone(s) for the [specify Operational Program name] are reviewed in accordance with [specify applicable regulation]. The implementation milestone(s) is/are [identify milestone] [and, if applicable, add per regulation].</p>
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#### Technical Rationale

The technical rationale for application of these acceptance criteria to the areas of review addressed by this SRP section is discussed in the following paragraphs:

1. [insert bases for referencing applicable requirements and/or acceptance criteria.]
2. etc.....

III. REVIEW PROCEDURES

The reviewer will select material from the procedures described below, as may be appropriate for a particular case.

These review procedures are based on the identified SRP acceptance criteria. For deviations from these acceptance criteria, the staff should review the applicant's evaluation of how the proposed alternatives provide an acceptable method of complying with the relevant NRC requirements identified in Subsection II.

<b>H</b>	<p>For operational programs add:</p> <p><u>Operational Programs.</u> The reviewer verifies that the [specify applicable operational program] is fully described and that implementation milestones have been identified. The reviewer verifies that the program and implementation milestones are included in FSAR Table 13.x.</p> <p>Implementation of this program will be inspected in accordance with NRC Inspection Manual Chapter IMC-2504, "Construction Inspection Program - Non-ITAAC Inspections."</p> <p>[Noted: For program implementation not specified by regulation, add a statement indicating that the reviewer ensures the program and associated implementation milestone(s) are included within the license condition on operational programs and implementation.]</p>
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<b>I</b>	<p>For design certification and COL reviews add:</p> <p>For review of a DC application, the reviewer should follow the above procedures to verify that the design, including requirements and restrictions (e.g., interface requirements and site parameters), set forth in the final safety analysis report (FSAR) meets the acceptance criteria. DCs have referred to the FSAR as the design control document (DCD). The reviewer should also consider the appropriateness of identified COL action items. The reviewer may identify additional COL action items; however, to ensure these COL action items are addressed during a COL application, they should be added to the DC FSAR.</p> <p>For review of a COL application, the scope of the review is dependent on whether the COL applicant references a DC, an early site permit (ESP) or other NRC approvals (e.g., manufacturing license, site suitability report or topical report).</p>
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<b>J</b>	<p>For ITAAC add:</p> <p>For review of both DC and COL applications, SRP Section 14.3 should be followed for the review of ITAAC. The review of ITAAC cannot be completed until after the completion of this section.</p>
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IV. EVALUATION FINDINGS

The reviewer verifies that the applicant has provided sufficient information and that the review and calculations (if applicable) support conclusions of the following type to be included in the staff's safety evaluation report. The reviewer also states the bases for those conclusions.

1. [insert]

<b>K</b>	<p>For COL reviews, a license condition for operational programs should be added to the license. Add:</p> <p>The applicant described the [specify applicable operational program] and its implementation in conformance with [specify applicable regulation]. [For program implementation not specified by regulation, add a statement indicating that the program and its implementation milestones are included within the license condition on operational program implementation.]</p>
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<b>L</b>	<p>For design certification and COL reviews add:</p> <p>For DC and COL reviews, the findings will also summarize the staff's evaluation of requirements and restrictions (e.g., interface requirements and site parameters) and COL action items relevant to this SRP section.</p>
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<b>M</b>	<p>For ITAAC add:</p> <p>In addition, to the extent that the review is not discussed in other SER sections, the findings will summarize the staff's evaluation of the ITAAC, including design acceptance criteria, as applicable.</p>
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V. IMPLEMENTATION

The staff will use this SRP section in performing safety evaluations of DC applications and license applications submitted by applicants pursuant to 10 CFR Part 50 or 10 CFR Part 52. Except when the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the staff will use the method described herein to evaluate conformance with Commission regulations.

The provisions of this SRP section apply to reviews of applications submitted six months or more after the date of issuance of this SRP section, unless superseded by a later revision.

VI. REFERENCES

1. [insert]

<b>N</b>	May be required for operational programs:  NRC Inspection Manual Chapter IMC-2504, "Construction Inspection Program - Non-ITAAC Inspections," issued April 25, 2006.
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**PAPERWORK REDUCTION ACT STATEMENT**

The information collections contained in the Standard Review Plan are covered by the requirements of 10 CFR Part 50 and 10 CFR Part 52, and were approved by the Office of Management and Budget, approval number 3150-0011 and 3150-0151.

**PUBLIC PROTECTION NOTIFICATION**

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

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**SRP Section ###**  
**Description of Changes**

This SRP section affirms the technical accuracy and adequacy of the guidance previously provided in (Draft) Revision X, dated XXXX of this SRP. See ADAMS accession number MLXXXXXXXX. [note: If there are exceptions identify here “with the following exception(s), as applicable”]:

1. [insert]
2. etc...

In addition this SRP section was administratively updated in accordance with NRR Office Instruction, LIC-200, Revision 1, “Standard Review Plan Process.” The revision also adds standard paragraphs to extend application of the updated SRP section to prospective submittals by applicants pursuant to 10 CFR Part 52.

The technical changes are incorporated in Revision #, dated Month, 2007:

Review Responsibilities - Reflects changes in review branches resulting from reorganization and branch consolidation. Changes are reflected throughout the SRP.

I. AREAS OF REVIEW

1. [insert]
2. etc....

II. ACCEPTANCE CRITERIA

1. [insert]
2. etc....

III. REVIEW PROCEDURES

1. [insert]
2. etc....

IV. EVALUATION FINDINGS

1. [insert]
2. etc....

V. IMPLEMENTATION

1. [insert]
2. etc....

VI. REFERENCES

1. [insert].

