

The following represent options for approaching concurrent reviews of a license renewal application (LRA) and a license amendment request (LAR) to adopt NFPA 805 to resolve non-compliances with 10 CFR 50.48.

**Option 1:**

Applicant can submit the NFPA 805 LAR after the license renewal review is completed and a renewed license is issued.

**Option 2:**

~~Applicant can submit the NFPA 805 LAR after submitting the license renewal application. If the license renewal review is well underway, this could require the staff to suspend the license renewal review until an amended license is issued to establish the new CLB for 10 CFR 50.48 (fire protection) compliance.~~

**~~Option 3\*:~~**

Applicant can submit the NFPA 805 LAR before or ~~shortly~~ after submitting a license renewal application. CLB changes associated with the NFPA LAR ~~may~~ be considered in accordance with 10 CFR 54.21(b) provided that

1. the NFPA 805 LAR is processed by the staff,
2. the license is amended,
3. associated CLB changes are sub~~mi~~<sup>mitted</sup>ed by the applicant as a amendment to the LRA, pursuant to 10 CFR 54.21(b), ~~and~~
4. ~~the staff has sufficient time to review the CLB changes before the license renewal Final SER is issued.~~

~~\*Caveat for Option 3 - the viability of this option will depend on several factors, including:~~

- ~~• the timing of the NFPA 805 LAR submittal relative to the LRA submittal,~~
- ~~• how long the staff takes to complete the NFPA 805 LAR review, and~~
- ~~• the scope and volume of associated changes to the CLB requiring license renewal review.~~