



Combined Licenses

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Sources of Information

- ❑ SECY-00-0092, COL Review Process, April 20, 2000
- ❑ SECY-05-0197, Review of Operational Programs in a COL Application and Generic EP ITAAC, October 28, 2005
- ❑ Appendix D of Draft NEI-04-01, Rev. D, December 21, 2004
- ❑ License conditions in ESPs and proposals from COL applications



Issues for Consideration

- ❑ Removal of security and fire conditions
- ❑ Form of ITAAC license appendix
- ❑ Wording of operational program conditions
- ❑ License conditions on power ascension
- ❑ License conditions on DAC schedules
- ❑ License condition on Environmental PP



Security & Fire Protection Conditions

- ❑ Revised 10 CFR Part 73 rule eliminated the need for security license condition
- ❑ RG 1.189 states NRC staff considering use of 10 CFR 50.59 to control changes to fire protection program
- ❑ Fire protection program implementation will be controlled through a generic operational program license condition



ITAAC appendix

- An appendix to the combined license will contain all ITAAC for the plant
- How will the complete (design certification + site-specific) ITAAC list be generated?
- “Sunsetting” of ITAAC provisions will be based on 10 CFR 52.103(h)



Operational Program Conditions

- Two license conditions
 - Requirement to implement programs
 - Requirement to provide implementation schedule to NRC
- Some COL applicants have proposed wording different from SECY-05-1097
- Proposed wording reflects that 2nd condition aimed at timing of NRC inspections



Power Ascension Testing

- Two conditions proposed & approved in SECY-00-0092
- Low-Power Testing: Upon approval of the Director of the Office of Nuclear Reactor Regulation, the licensee is authorized to perform low-power testing and operate the facility at reactor steady-state core power levels, not in excess of [XX] megawatts thermal (5-percent power), in accordance with the conditions specified herein.
- Maximum Power Level: Upon approval of the Director of the Office of Nuclear Reactor Regulation, the licensee is authorized to perform power ascension testing and operate the facility at reactor steady-state core power levels, not in excess of [XXXX] megawatts thermal (100 percent power), in accordance with the conditions specified herein.



Power Ascension Testing (cont'd)

- NEI commented in 2004:
 - These conditions were not consistent with 10 CFR Part 52
 - Only positive finding NRC must make post-construction is 52.103(g) ITAAC finding
 - Envisioned licensee would still need to satisfy license condition of satisfactory completion of start-up testing



DAC Implementation Schedules

- Purpose of license condition is to facilitate NRC inspection of DAC implementation
- License condition would require NRC notification of expected completion dates for DAC milestones
- Specifics will be discussed at individual DCWG meetings



Future Actions

- Today
 - Solicit additional issues for consideration
 - Solicit input on NRC-identified issues
- Future COL meeting – discuss positions on identified issues
- After discussions complete – NRC staff prepares Commission paper proposing revision to the Model (generic) COL