

**ALL TECHNOLOGIES –
DESIGN-CENTERED WORKING GROUPS
GENERIC TOPICS RELATED TO
COMBINED LICENSE APPLICATIONS**

**Incorporation of NEI
templates**

Industry Proposal

- In some cases, there is an alternative to “incorporate by reference.”
- Include a statement in the FSAR that the program will be developed and implemented in accordance with the templates.

Add the following information at the end of **DCD Subsection 11.5.6.5**.

STD COL 11.5-2 The sampling program and the associated monitors conform to Regulatory Guide 4.15, Revision 1 (See **Appendix 1AA**).

11.5.7 COMBINED LICENSE INFORMATION

STD COL 11.5-1 ~~This section adopts NEI 07-09 (Reference 202), which is currently under review by NRC staff.~~ The ODCM program description contains the methodology and parameters used for calculating doses resulting from liquid and gaseous effluents. The ODCM program description addresses operational setpoints, including planned discharge rates, for radiation monitors and monitoring programs (process and effluent monitoring and environmental monitoring) for the control and assessment of the release of radioactive material to the environment. The ODCM program description provides the limitations on operation of the radwaste systems, including functional capability of monitoring instruments, concentrations of effluents, sampling, analysis, 10 CFR Part 50, Appendix I dose and dose commitments, and reporting. The ODCM program description will be finalized prior to fuel load with site-specific information.

An Offsite Dose Calculation Manual is developed and implemented in accordance with the recommendations and guidance of Nuclear Energy Institute (NEI) 07-09A, "Generic FSAR Template Guidance for Offsite Dose Calculation Manual (ODCM)," (Reference 202).

Table 13.4-201 provides milestones for ODCM implementation.

11.4.6 COMBINED LICENSE INFORMATION FOR SOLID WASTE MANAGEMENT SYSTEM PROCESS CONTROL PROGRAM

Add the following information to the end of DCD Subsection 11.4.6.

This COL Item is addressed below.

STD COL 11.4-1



A Process Control Program is developed and implemented in accordance with the recommendations and guidance of Nuclear Energy Institute (NEI) 07-10A, "Generic FSAR Template Guidance for Process Control Program (PCP), (Reference 201).

~~This section adopts NEI 07-10 (Reference 201) which is currently under review by the NRC staff.~~ The Process Control Program (PCP) describes the administrative and operational controls used for the solidification of liquid or wet solid waste and the dewatering of wet solid waste. Its purpose is to provide the necessary controls such that the final disposal waste product meets applicable federal regulations (10 CFR Parts 20, 50, 61, 71, and 49 CFR Part 173), state regulations, and disposal site waste form requirements for burial at a low level waste (LLW) disposal site that is licensed in accordance with 10 CFR Part 61.

Waste processing (solidification or dewatering) equipment and services may be provided by the plant or by third-party vendors. Each process used meets the applicable requirements of the PCP.

No additional onsite radwaste storage is required beyond that described in the DCD.

Table 13.4-201 provides milestones for PCP implementation.

Relevant ODCM SER conclusions

- The staff concludes that the NEI 07-09 Template sufficiently describes the programmatic elements and operational objectives to enable a reasonable assurance finding of acceptability for issuance of a COL, followed with verification of the implementation of a site and plant-specific SREC, ODCM, and REMP through the inspection process before fuel load. ***The staff concludes that the NEI 07-09 Template is adequate and may be referenced in a COL application,*** and that the implementation of a plant and site-specific SREC, ODCM, and REMP will be executed by COL holders in accordance to milestones described in COL SAR Section 13.4 and license conditions.
- Accordingly, the NEI 07-09 Template fulfills a licensing requirement for submission of a COL application. ***A license condition will specify the timing for the licensee to make a site and plant-specific ODCM available for NRC inspection and verification prior to fuel load.*** Finally, under the requirements of SECY 05-0197, the implementation of operational programs identified in the NEI 07-09 Template does not necessitate ITAACs in a DC or COL application.

Relevant PCP SER conclusions

- The final PCP prepared under a license condition will be further described in site and/or operating procedures as specified in the PCP template. Sufficient records will be maintained and kept available for NRC inspection during construction to verify adequacy of the program.
- On the basis of its review, the staff concludes that NEI-07-10, “Generic FSAR Template Guidance for Process Control Program,” Revision 3 adequately provides guidance for establishing the PCP. ***Accordingly, NRC staff concludes that NEI-07-10 Revision 3 complies with the applicable NRC regulations, guidance, and industry standards and can be utilized by applicants for COLAs.***