

**Lessons Learned in License Renewal
(Another 40 years to serve the industry)**

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Get Started Early

- We started over a year in advance of our filing date
- Established a Management Steering Committee
- Established “Point” leaders for each chapter
- Created milestone schedule
- Regular update meetings with Str. Comm. – monitoring progress and providing strategy decisions



Regulatory Status

- ISA submitted – not approved, sequenced License application review to follow ISA approval
- EP Plan recently approved
- MC&A Plan recently approved
- Physical Protection Plan recently approved
- Decommissioning Funding Plan approved

All support licensing documents had recent or pending approval



Regulatory Process

- 1520 Guidance – but...
 - Recognized the need to follow format and content
 - Used 1520 and current License chapters as a starting point and sometimes needed gap analysis
 - Drove resolution of meeting 1520 or justification for alternative approach

Tough Spots – Vintage of Plant

- 30+ year plant built in many different stages
 - Affects issues in Fire Protection
 - Affects Building Codes applied
 - Needed to address aging questions
 - 40 Year term of application impacting Environmental Review

Environmental Review – 40 Year Term

- Challenge for us and the NRC - First of a Kind
- NRC had an early team effort with outside contractor support
- Needed “different” perspective to address
 - What has or will change
 - “Aging” and Management Measures
 - Extended duration of operation



Surprises

- Late in the Process – During Concurrence
 - State Historical Preservation Officer concern
 - Need for site cultural resources survey
 - 50 year historic architectural assessment
 - Native Tribe concurrence

Opportunities for Improvement

- We should have had safety function specific meetings on chapters with NRC
- Try to maintain both side's staff consistent through review/sign off
- Discuss alternatives to 1520 as needed early in the process or as soon as identified
- Prioritize goals for flexibility

Summary

- Get organized - get committed
- Monitor throughout process –internally and externally
- Use 1520 and prepare for exceptions
- Start ER review early

New Part 70 License can create flexibility and greater overall Safety

