



Interim Staff Guidance Post-COL Commitments

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ISG-015: Goals for Presentation

- Provide a status of the draft ISG
- Provide a summary of the draft ISG
- Provide an opportunity to ask questions
- Discuss next steps



ISG-015: What is it?

- Guidance for COL applicants and NRC staff on appropriate options for classifying post-licensing commitments (i.e., COL action items that cannot be completed until after license issuance):
 - ITAAC
 - License Conditions
 - FSAR Information Commitments

- Also includes guidance for commitments identified during COL application reviews that are not associated with COL action items



ISG-015: Why do we need it?

- ❑ There was recognition that some COL action items could not be completed until after license was issued
- ❑ DC applicants were distinguishing between COL action items and COL holder items
- ❑ COL applicants were proposing post-licensing actions and staff needed guidance to review those proposals and make a final determination
- ❑ SERs for Bellefonte and North Anna COL applications contain open items related to development and use of this guidance



ISG-015: Summary

- ❑ Provides guidance for both DC and COL applicants
- ❑ Supplements guidance already provided in RG 1.206, Section C.III.4.3, “Combined License Information Items that Cannot Be Resolved Before Issuance of a License”
- ❑ Provides guidance for the staff in a proposed appendix to SRP 1.0
- ❑ Guidance also addresses post-licensing information commitments identified during COL review and not associated with COL action items
- ❑ Clarify ISG to state that any and all information necessary for the staff to issue a license must be provided as part of the COL application and cannot be deferred via a COL action item
- ❑ No “COL Holder items”



ISG-015: Summary (cont'd)

- Guidance for COL applicants and NRC staff on appropriate options for classifying post-licensing commitments (i.e., COL action items that cannot be completed until after license issuance):
 - ITAAC
 - License Conditions
 - FSAR Information Commitments

- Guidance on use of ITAAC follows RG 1.206, Sections C.II.1, C.III.1, and C.III.7, and SRP 14.3 - includes provisions for COL applicants to propose new/revised ITAAC for areas of design that are within the scope of the referenced DCD



ISG-015: Summary (cont'd)

- Guidance on use of license conditions includes:
 - notifications to NRC (e.g., availability of completed DAC for inspection)
 - operational restrictions
 - restrictions on power level
 - performance of special tests
 - implementation milestones for operational programs

- Provides guidance on use of specific language in COL action items and post-licensing commitments (i.e., don't use “submit”, “provide”, etc.)



ISG-015: Summary (cont'd)

- Guidance on use of FSAR commitments
 - differentiate between FSAR information needed to update licensing basis (i.e., for use in 50.59, 50.65, 50.54(f) evaluations) and UFSAR information
 - specific FSAR information needed to update licensing basis will be included in a License Condition with appropriate implementation milestones (e.g., prior to fuel load, initial criticality, exceeding 5% power, etc.)
 - remaining FSAR information updates to be performed using guidance in RG 1.181 which endorses NEI 98-03
- Examples provided highlight differences in the way COL action items were defined and scoped in referenced DCDs



ISG-015: Next Steps

- Resolve any remaining internal staff comments and concerns regarding the draft ISG
- Obtain concurrence and issue as draft for public comment in September 2009
- Plan to have follow-up discussions at DCWG meeting in November 2009