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UNITED STATES NUCLEAR REGULATORY COMMISSION
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Public Meeting for the Discussion of Revision 1 to NUREG–1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility"

- ***October 8, 2009*** -

NUREG-1520 is available at http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1520/

Introduction

The Office of Nuclear Material Safety and Safeguards (NMSS) has developed a draft revision to NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility." The draft revision updates the original report published March 2002.

The NMSS staff has updated the Standard Review Plan, or SRP, to improve the guidance for fuel cycle facility licensing applications by providing greater clarity in specific areas of the licensing program and adding additional guidance in areas where information was lacking or not suitably addressed. This effort was focused on improving both the clarity, and also consistency, of the SRP, with agency positions that support compliance with current regulations.

General Changes to NUREG-1520

Staff updated the Standard Review Plan in the following ways:

- Improve linkage of review content to regulatory requirements.
- Incorporate interim staff guidance positions and update references.
- Incorporate lessons learned from licensing experience and provide technical clarifications.
- Add a new subsection called "Review Interfaces."
- Reformat all the chapters for consistency with NUREG format.
- Add additional guidance, clarification, and references for meeting regulatory requirements.
- Remove redundant and vague guidance, nonrequirements and commitments to follow the regulations.
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Summary of Changes by Chapter

Chapter 1, "General Information"

- Updated responsibilities of review in section 1.2, Institutional Information.
- Added language under "financial qualifications" clarifying the

acceptance criteria for applications for new facilities.

Chapter 3, "Integrated Safety Analysis & Integrated Safety Analysis Summary"

- Provided more directly applicable guidance for licensing of new facilities, as opposed to facilities that were constructed/licensed prior to the revision of Subpart H, "Additional Requirements for Certain Licensees Authorized To Possess a Critical Mass of Special Nuclear Material," of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 70, "Domestic Licensing of Special Nuclear Material," requiring Integrated Safety Analysis (ISA).
- Provided additional guidance on the extent to which the review and approval is programmatic, as opposed to a design review.
- Provided additional guidance on what constitutes an acceptable "level-of-detail" for descriptions of facility processes and items relied on for safety, sufficient for licensing approval.
- Provided additional guidance on acceptable methods of evaluating likelihood. Consists of previously developed interim staff guidance.

Chapter 4, "General Information"

- Added Section 4.4.8, "Control of Radiological Risk Resulting from Accidents."

Chapter 5, "Criticality"

- Expanded discussions of the Nuclear Criticality Safety Program, code validation, technical practices and use of standards
- Provided additional guidance for safety program review
- Provided additional pointers to other SRP chapters for guidance for interacting with other technical disciplines
- Provided reference to discussions on level of detail and the reasonable assurance standard and the role of the operational readiness review.
- Incorporated Interim Staff Guidance 03, "Nuclear Criticality Safety Performance Requirements, and description of Double Contingency Principle."

Chapter 6, "Chemical Safety"

- Clarified and referenced regulatory requirements to review content.
- Divided review areas into the following subsections for consistency:
  - Chemical process description
  - Chemical accident sequences
  - Chemical accident consequences
  - Chemical process items relied on for safety (IROFS) and sole IROFS
  - Chemical process management measures

Chapter 7, "Fire Safety"

- Added a subsection to Section 7.4.3.2, Fire Hazard Analysis, regarding deviations from National Fire Protection Association (NFPA) codes and standards and added clarification concerning the "authority having jurisdiction" (AHJ).
- Listed specific information required by staff to review the fire safety aspects of the facility design.
- Included criteria for ISA review of fire-initiated accident sequences and associated IROFS and management measures.

Chapter 9, "Environmental Protection"

- Removed almost all details about National Environmental Policy Act reviews and preparation of Environmental Assessments (EAs) and EISs since they are addressed in detail in NUREG–1748, Environmental Review Guidance for Licensing Actions Associated with NMSS Programs."
- Added more detailed language for the categorical exclusions used most often.

Chapter 10, "Decommissioning"

- Added information regarding conceptual decontamination plan, decommissioning costs and financial assurance.
- Added information regarding record keeping requirements.

Chapter 11, "Management Measures"

- Updated to reflect current practices for assignment of responsibility for review.