

**Appendix C to NEI 96-07**  
**Guideline for Implementation of**  
**Change Control Processes for**  
**New Nuclear Power Plants**  
**Licensed Under 10 CFR Part 52**

October 7, 2010

# Appendix C is Based on Main Body of NEI 96-07, Revision 1

- Much of the existing guidance is readily adaptable to Part 52 (for both construction and operation)
  - Maintain intent of guidance in Rev. 1
  - Use existing words and examples to maximum extent possible

## Updated Guidance, Where Needed

- Modified, as needed, to be consistent with Part 52
  - Tier 1, Tier 2\*, severe accident, aircraft impact
- Updated guidance for evaluating consequence of accidents and malfunctions
  - New plants have different dose limits
  - Have updated the text
  - Need to update the examples

# Open Items

- Need to complete guidance for:
  - Severe Accident Criteria (Section 4.1.2.2.2)
  - Changes to Chapter 19 Information (Section 4.3)
- As appropriate, continue to refine guidance in Section 4.6 (Disposition of Departures and Changes)

# Introduce Integrated Approach

- Licensees may elect to use an integrated change control process
  - Apply Section VIII processes to site-specific FSAR and plant-specific DCD information
- Licensees may create an integrated FSAR
  - Combine COL FSAR and DCD information into single integrated FSAR
  - Easier to understand entire licensing basis

## New Guidance for ESPs

- Preconstruction activities, as defined in 10 CFR 50.10(a)(2), can be implemented without prior NRC approval.
- Changes to the ESP or SSAR require amendments.
  - A change is material to the bases for NRC's issuance of the ESP (consider the SSAR, SER, and whether the proposed activity deviates from one or more site characteristics, design parameters, or ESP terms or conditions)

## New Guidance for LWAs

- LWA applications will include a change process
  - Proposed changes are screened and evaluated to determine whether the changes can be implemented without prior NRC review approval.
  - If a proposed change requires prior NRC approval, then an LWA amendment request must be submitted in accordance with 10 CFR 50.90 and 10 CFR 50.92.