



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 13, 2011

MEMORANDUM TO: Robert A. Nelson, Deputy Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Michael Mahoney, Project Manager
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MARCH 17, 2011, MEETING WITH NUCLEAR ENERGY
INSTITUTE (NEI) LICENSING ACTION TASK FORCE (LATF)
REGARDING THE PRESUBMITTAL PROJECT.

On March 17, 2011, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of the NEI LATF at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland, Room 13G04. The purpose of the meeting was to discuss the pre-submittal project. A list of attendees is provided as Enclosure 1.

DISCUSSION

The purpose of the meeting was to discuss the pre-submittal project as part of the licensing process. It was stated at the beginning of the meeting that the NRC would be unable to commit additional resources to this project after the meeting but that the NRC supports this effort. It was recommended by the NRC to have a licensee "test-run" the pre-submittal project in an upcoming license amendment request and that the NRC would support the meeting.

The LATF presented a draft checklist which was discussed during the meeting (Enclosure 2). This checklist would be used by the licensee to prepare for the pre-submittal meeting and submit it to the NRC ahead of the meeting. The NRC had the following comments regarding the checklist:

- Add a 3rd column which would be for the disposition (NRC feedback).
- Make the checklist part of the meeting summary.
- Add a section for 3rd party/independent guidance.
- Add a checkbox on the first page to determine which disciplines would be involved and remove the individual discipline sections for consolidation purposes.
- Add section for environmental impacts.
- Add section for safety justification for the proposed licensing action.
- Add section for no significance hazards consideration determination.

The NRC and LATF discussed a timeline for providing the checklist to the NRC prior to the meeting and it was generally agreed that 1-month prior to the pre-submittal meeting is reasonable.

The NRC and LATF discussed the problem statement for the pre-submittal project. The problem statement as defined by the LATF is as follows:

There is a lack of a common understanding between the NRC and the licensee regarding the regulatory guidance and criteria that will be applied to complex, unique, first-of-a-kind and in some cases, routine license reviews resulting in schedule delays, incurred costs, rework, and unpredictable outcomes.

The NRC stated the goals of the pre-submittal meeting should consist of the following:

- To surface issues at the beginning of the licensing process
- To determine technical areas which will need to be part of the review
- To raise issues which could prevent approval of the proposed action

The NRC and LATF discussed application of the pre-submittal meeting and checklist for routine licensing actions and it was generally agreed that this process would be used for complex licensing actions and would not be as beneficial for routine actions.

Members of the public were not in attendance. Public Meeting Feedback forms were handed out and no comments were received.

Enclosures:

1. List of Attendees
2. Draft Licensing Action – Regulatory Review Criteria Checklist

cc w/encls: Distribution

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LIST OF ATTENDEES

MARCH 17, 2011, MEETING WITH NUCLEAR ENERGY INSTITUTE LICENSING ACTION

TASK FORCE

PRESUBMITTAL PROJECT

<u>Name</u>	<u>Organization</u>
Robert Nelson	NRC
Timothy Byam	Exelon
Tom Lentz	FENOC
Edward Weinkam	Entergy
Julie Keys	NEI
Jim Morris	STP Nuclear Operating Company
Nicholas Buggs	NRC
Michael Mahoney	NRC
Nicole Glenn	NRC
Randy Hall	NRC
Michael Markley	NRC

LICENSING ACTION - REGULATORY REVIEW CRITERIA

Licensing Activity: _____

Plant Name _____

License Amendment Request Relief Request Exemption Request Other _____

	Printed Name	Signature	Date
Licensing Specialist			
Peer Reviewer			
Licensing Supervisor			

	Licensing Basis Source	Current Licensing Basis	Proposed Licensing Basis for Submittal
GENERAL REGULATORY GUIDANCE			
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		
DISCIPLINE SPECIFIC REGULATORY GUIDANCE			
Reactor Safety Systems			
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		

ENCLOSURE 2

	LICENSING ACTION - REGULATORY REVIEW CRITERIA
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Licensing Activity:

	Licensing Basis Source	Current Licensing Basis	Proposed Licensing Basis for Submittal
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		

DRAFT

LICENSING ACTION - REGULATORY REVIEW CRITERIA

Licensing Activity:

	Licensing Basis Source	Current Licensing Basis	Proposed Licensing Basis for Submittal
Balance of Plant			
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		
Containment and Ventilation			
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		
Accident Dose			
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		

LICENSING ACTION - REGULATORY REVIEW CRITERIA

Licensing Activity:

	Licensing Basis Source	Current Licensing Basis	Proposed Licensing Basis for Submittal
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		
Probabilistic Risk Assessment			
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		
Fire Protection			
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		
Piping and NDE			

LICENSING ACTION - REGULATORY REVIEW CRITERIA

Licensing Activity:

	Licensing Basis Source	Current Licensing Basis	Proposed Licensing Basis for Submittal
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		
Steam Generator Tube Integrity			
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		
Component Performance and Testing			
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERS, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		

LICENSING ACTION - REGULATORY REVIEW CRITERIA

Licensing Activity:

	Licensing Basis Source	Current Licensing Basis	Proposed Licensing Basis for Submittal
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		
Security			
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		
Emergency Plan			
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		
Other:			

LICENSING ACTION - REGULATORY REVIEW CRITERIA

Licensing Activity:

	Licensing Basis Source	Current Licensing Basis	Proposed Licensing Basis for Submittal
	Key Licensing Basis Inputs and Methods (UFSAR, TS, NRC correspondence, commitments, SERs, etc)		
	General Design Criteria		
	Standard Review Plan		
	Regulatory Guides		
	Topical Reports		
	Other Regulatory Guidance (NUREG's, GLs, RIS, etc.)		

Industry Operating Experience	Relevance to Submittal and Resolution Approach

R. Nelson

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