# Gap Analysis and DCA Content Outline



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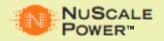
## Background

- NEI position paper: SMR Pre-application engagement
- Current guidance that informs DCD content was developed for different designs (NUREG 0800, RG 1.206)
- Early identification of requirements and guidance that do not apply to the NuScale design
- NRC developing design-specific review plans and design-specific review standards
- SECY 11-0024 presents staff's risk-informed and integrated review framework



#### Issues

- Not all current NRC requirements and guidance, related to the evaluation of the DCA, are applicable.
- DCA structure for this design needs to be established prior to DCA submittal.
- Content for new sections as well as similar sections with different safety significance needs to be determined.
- Recent guidance issued after the SRP and RG 1.206 needs to be incorporated.



### **Pre-Application Outcomes**

- Agreement on applicability of NRC requirements and guidance
- Alignment on DCD content changes
- Feedback on proposed content outline for new sections and sections with different levels of detail



#### **Pre-Application Engagement**

- Preliminary technical report indicating applicability of requirements and guidance (result of gap analysis)
- White paper on DCD format and content
  - present changes to DCD outline and content
  - based on NuScale design differences as noted in the GAP analysis
  - contain content outline for new sections as well as existing sections with different safety significance
  - discuss level of detail that is appropriate
- Results of engagement on other topics will be used to inform DCD content outline

