

GLE Commercial Facility Mandatory Hearing

ASLB Presentation Topic #'s 4.A., 4.B., & 4.C.

Tracking and Implementation of Applicant Commitments

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Overview

- Commitments and Regulatory Requirements (4.A.)
- GLE's Commitment Tracking and Implementation Process (4.B.)
- Detecting and Correcting Noncompliances (4.B.)
- Preparation for the NRC Operational Readiness Review (ORR) (4.C.)

Commitments and Regulatory Requirements (4.A.)

Regulatory Requirements

- Local, State, Federal, and International laws that are applicable to GLE's activities

License Conditions

- Imposed by regulation
- Proposed by NRC staff

Commitments

- Promise to perform an action that may be tied to a regulatory requirement
- Two types: mandatory and voluntary

Commitments and Regulatory Requirements

Mandatory Commitments

- Required by a regulatory agency and include compliance with license conditions

Voluntary Commitments

- Selective actions generally above and beyond those required by applicable regulations

Mitigation Measures

- Subset of commitments made to minimize impacts on the environment

Commitments and Regulatory Requirements

Changes to Commitments

- NRC approval is required before making changes to the License Application that:
 - Decrease effectiveness of its commitments;
 - Conflict with a license condition; or
 - Require prior approval under 10 CFR § 70.72
- If NRC approval is required, GLE will submit a license amendment request
- If NRC approval is not required, GLE will submit a summary of the changes

GLE's Commitment Tracking and Implementation Process (4.B.)

Compliance Checklists

- Finalizing checklists to track and implement current commitments, including license conditions and industry codes and standards
- Functionality of Checklists
 - Maps commitments and license conditions to regulatory requirements and GLE procedures
 - Details actions and responsible individuals, which are tied to an electronic calendar system, with automated reminders
- Will be made available for NRC review

GLE's Commitment Tracking and Implementation Process

New or modified regulatory requirements and guidance

- GLE has adopted procedures for reviewing, tracking, and implementing new or modified regulatory guidance and requirements

Implementing Voluntary Commitments

- Determine feasibility according to five identified factors
- Whether feasible or not, will note the decision in the compliance checklists

Detecting and Correcting Noncompliances (4.B.)

Corrective Action Program (CAP)

- Captures broad range of issues, including improper implementation of commitments and noncompliances
- Primary goal is to improve quality and performance

Self-Assessment Program

- Primary method for proactively identifying noncompliances for inclusion in the CAP
- GLE will conduct periodic assessments and audits of various programs and functions

Detecting and Correcting Noncompliances

Handling Noncompliances

- Potential noncompliances will be evaluated in accordance with Reporting Procedures
- Initiate corrective action request in the CAP
- Possibly conduct an incident investigation to assess the validity of data, implement corrective action plans, and ensure regulatory agencies are notified as appropriate

Preparation for the NRC ORR (4.C.)

GLE understands that the NRC will perform an ORR before beginning operations

GLE will perform internal readiness reviews

- Conducted well before the ORR
- Multi-disciplinary team
- Use of NRC inspection manual and other guidance documents