

# **Industry Guidance for Effective Pre-Application Interactions with Agencies other than NRC During the ESP Process (NEI 10-07)**

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# ESP Task Force

- Formed to support current and future ESP applications
- Focused on creating standardized tools for ESP applicants
- Consists of Broad Membership
  - Utilities planning to file (or having recently filed) ESPs
  - Utilities with approved ESPs
  - Vendors
    - Conventional Light Water Reactors
    - Small Reactors
- Developed Plant Parameter Envelope guidance (NEI 10-01)
  - Submitted to NRC March 2010
  - Revised May 2012 in response to NRC Requests for Additional Info.

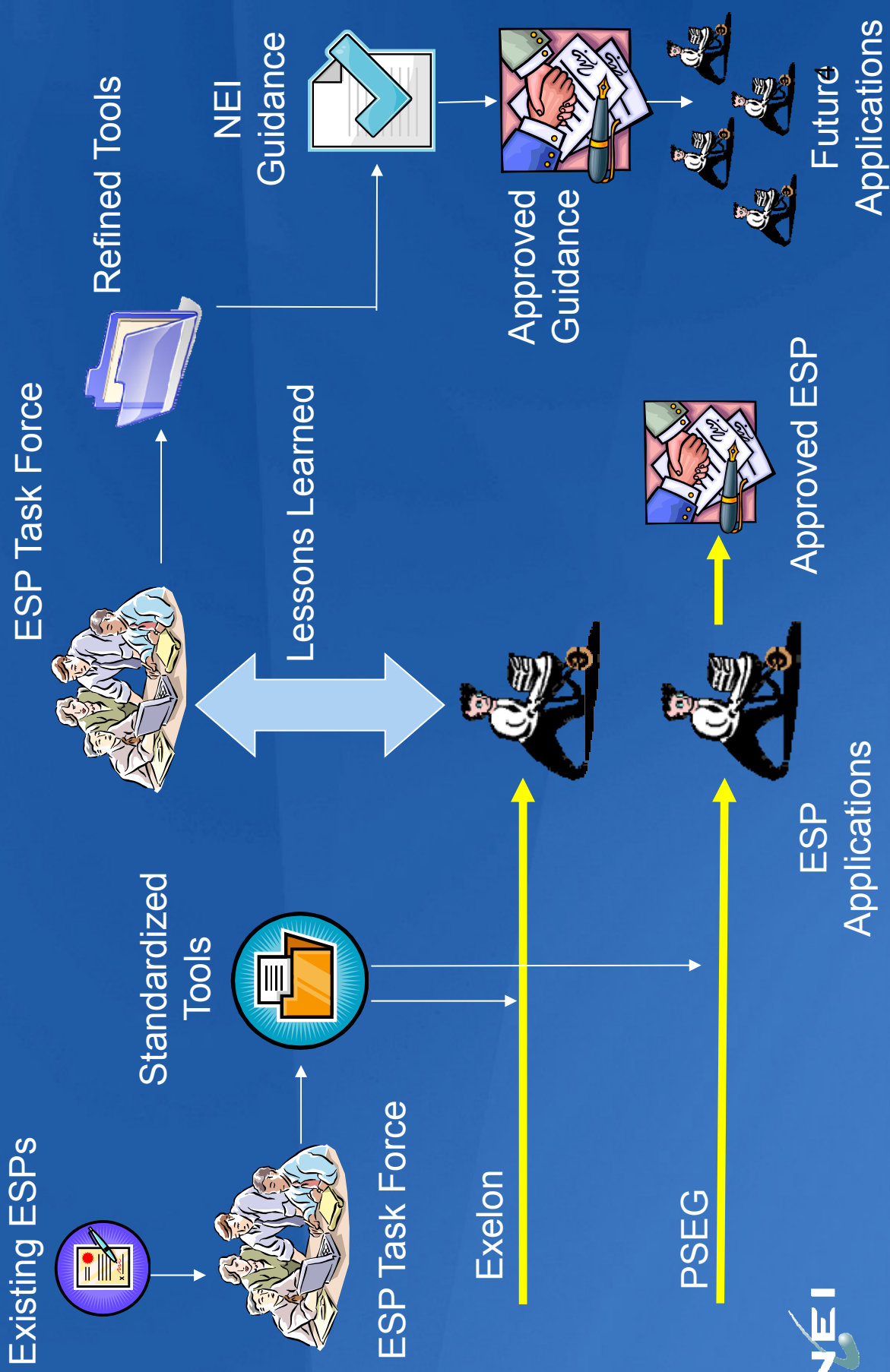


Developed Pre-Application Interaction guidance (NEI 10-07)

# Historical Background and Context

- “Initial” ESP Applicants
  - Clinton, North Anna, Grand Gulf, Vogtle
- Pre-application interactions were primarily between applicants and NRC
- 2002-2003: NRC ESP-specific review guidance was under development
  - NUREG-0800, NUREG-1555 available
  - RS-002: Review/Comment process; Issued via SRM (SECY-03-0227, May 2004)
- Overarching Lesson: ESP issue resolution would be improved by effective, informed Pre-Application interactions

# ESP Task Force Path Forward



## NEI 10-07 -- Desired Outcomes

- Produce guidance for industry
- Build understanding of Federal, State, and Local Agency roles and boundaries
- Establish efficiency of process
- Identify and resolve unique siting issues early in the process

## NEI 10-07: Topics

- Areas of Pre-Application Interactions
- Objectives of Pre-Application Interactions
- Strategy for Pre-Application Interactions
- Multi-Party Interactions
- NRC Pre-Application Site Visit

## Areas of Pre-Application Interactions

- Initiation of Informal Consultation
- Identification of Regulatory Interfaces
- Data Collection
- Engagement of Permitting Agencies
- Identification of Significant Issues



# Objectives

- Achieve Efficiency
- Identify Site Specific Issues Early
- Optimize ESP Value
  - Consistently define “new and significant information”
  - Minimize need to revisit decisions
  - Achieve balance between costs of early commitment and going forward risk
- Confirm Information Availability & Adequacy
- Establish Common Understanding of Project



# Strategy

- Project and Site Specific Issues
- Timing of Agency Interactions
- Identification of Agency Contacts
- Planning and Conducting Interactions

## Multi-Party Interactions

- Interactions involving applicant and multiple other agencies
- Interactions involving NRC and other agencies

## NRC Pre-Application Visit

- Conducted per RG 1.206 Section C.IV.7
- Occurs months to a year prior to submittal
- Confirms applicants capability to submit application
- Provides chance for feedback and improved understanding

## Conclusion

- Industry ESP Task Force has developed guidance on effective multi-agency interactions
- Preserving lessons learned for future applicants is now as important as ever
- Additional dialogue is most welcome