




Project Instruction
for the
Detroit Edison Fermi 3
Combined License Application Development Project

Title:
Fermi 3 COLA Scope and Overview

Project Instruction No.: 147483.21.2006

Revision No.: 1

Prepared By:  Printed Name: Steve A Bennett Date: 1/14/08
Reviewed By:  Printed Name: Steve Thomas Date: 1/16/08
Approved By:  Printed Name: Robert A. Candall Date: 1/16/2008

REVISION HISTORY

Rev	Section	Revision Description
1	Throughout Throughout § 5.4 § 5.5 § 5.8 § 6.0 Att 7.1 Att. 7.2 Att. 7.3	The following are those changes that are considered substantial in content 1. Updated PI to reflect GE ESBWR as reactor technology vendor 2. Added statement to each COLA Part to apply PI 147483.21.2008 to extent practical 3. Modified ER discussion consistent with current regulatory guidance 4. Removed redundant statement and added TS development details 5. Added DCD Tier 1 and Tier 2 departure guidance details 6. Added new References 6.8 through 6.10 7. Updated COLA parts details to latest expected approach 8. Updated IBR and Standard section information based on North Anna COLA 9. Updated Operational Programs table and added NEI Template column. All other changes are considered minor or editorial
0		Initial Issue

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1.0 PURPOSE

The purpose of Instruction is to:

- 1.1 Provide an overall framework for development of all aspects of the Fermi 3 Combined License Application (COLA) process in accordance with Project Management Memorandum 147483.21.1000 for the COL Application deliverables (Ref. 6.1).
- 1.2 Provide compliance with NRC requirements and/or guidance,
- 1.3 Provide a framework for other project instructions and desk guides for preparing the Fermi 3 COL application

2.0 APPLICABILITY

- 2.1 10 CFR 52 provides the overall regulatory requirements for seeking a COL. If the licensee is intending to reference a standard plant design, the COL process is proposed where a Reference COLA (R-COLA) based on the reactor technology vendor (RTV) will be referenced by the Subsequent COLA (S-COLA).
- 2.2 The Fermi 3 COL application will use the GE ESBWR design and the North Anna R-COLA for preparation of the Fermi 3 S-COLA. This procedure addresses the actions necessary to incorporate Fermi 3 site-specific information the R-COLA documentation to develop the Fermi 3 COL application. RG 1.206 § C.III.1 provides the NRC guidance for seeking an S-COLA.

3.0 RESPONSIBILITIES

- 3.1 B&V Project Manager - Responsible for approval of this PI and its implementation.
- 3.2 B&V Licensing - Responsible for the COL preparation process described in this PI and overall coordination of the Fermi 3 COL application preparation and review.

4.0 DEFINITIONS and ACRONYMS

4.1 Acronyms

- COL – Combined License
- COLA – Combined License Application per 10CFR52
- DCD – Design Control Document
- DCWG – Design Centered Working Group
- DTE – Detroit Edison
- EIE – Electronic Information Exchange
- EP – Emergency Plan
- ER – Environmental Report
- FSAR – Final Safety Analysis Report

- FSER – Final Safety Evaluation Report
- GSI – Generic Safety Issue
- ITAAC - Inspections, Tests, Analyses, and Acceptance Criteria
- NEI – Nuclear Energy Institute
- NEPA – National Environmental Policy Act
- PI – Project Instruction
- PRA - Probabilistic Risk Assessment
- RG – NRC Regulatory Guide
- RTV - Reactor Technology Vendor
- SP – Security Plan
- SSCs – Systems, Structures, and Components
- TR – Topical Report
- TS – Technical Specifications
- USI – Unresolved Safety Issue

4.2 Definitions

- 4.2.1 Combined License (COL) - A combined construction permit and operating license with conditions for a nuclear power facility, issued pursuant to 10 CFR Part 52. A combined license under Part 52 authorizes construction and operation of a nuclear power facility. However, prior to operation of the facility, the Commission must find that the acceptance criteria in the combined license required inspections, tests, and analyses, are met.
- 4.2.2 COL Application (COLA) - A COLA is the applicant's submittal for seeking a COL. The Reference COLA (R-COLA) is the lead COLA for a specific reactor technology vendor that is to be referenced by Subsequent COLAs (S-COLA). Fermi 3 will be an S-COLA applicant.
- 4.2.3 DCD Departure - A departure is a plant-specific "deviation" from design information in a standard design certification. For a design certification, a departure is a deviation from the certification information which is certified by the NRC in a standard design certification rule. See also RG 1.206 § C.III.1.6.
- 4.2.4 Design-Centered Working Group (DCWG) – An industry group comprised of representatives from the appropriate reactor technology vendor to develop a Reference COLA (R-COLA) for use in modeling other Subsequent COLAs (S-COLA).
- 4.2.5 Environmental Report (ER) - The Environmental Report for a COL Application contains the information required to be submitted by an applicant to support the NRC finding, under NEPA rules, that the proposed action does not create an adverse environmental impact. See also RG 1.206 § C.II.2.
- 4.2.6 Exemption - An exemption is a Commission-granted dispensation from compliance with one or more of the Commission's rules and regulations which would otherwise apply to an entity, a license,

permit, or other approval such as a standard design certification rule. An exemption is required when the information supplied as part of the COLA represents a condition whereby the applicant is or may be exempted from NRC regulations, or from information contained in the applicable design certification rule. See also RG 1.206 § C.III.1.7.

- 4.2.7 Final Safety Analysis Report - The Final Safety Analysis Report is a report required by 10 CFR 52.79(b) (and 10 CFR 50.34(b)) to be included in each application for a license to operate a nuclear facility, and shall include a description of the facility, the design bases and limits on its operation, and a safety analysis of the structures, systems, and components as a whole.
- 4.2.8 Inspections, Test, Analysis and Acceptance Criteria (ITAAC) - A set of data or conditions that will be required to be confirmed from the Design Acceptance Criteria or other requirements that have to be confirmed after COLA issuance. ITAACs will be issued as license conditions with the COL.

5.0 PROCEDURE

5.1 General Requirements

The following general provisions, with the corresponding implementing regulations, apply to filing a COL application:

- The application must comply with the applicable filing requirements of 10 CFR 50.4, "Written communications," and 10 CFR 50.30, "Filing of application; oath or affirmation" (10 CFR 52.75(b)).
- The application must contain all of the information required by 10 CFR 50.33, "Contents of applications; general information" (10 CFR 52.77, "Contents of applications; general information").

The Fermi 3 COL Application is proposed to be comprised of 11 parts but will be consistent with the selected North Anna ESBWR reference COLA (R-COLA). Each part will be consistent with the requirements of 10 CFR 50.33 and meet the guidance of Regulatory Guide (RG) 1.206, (Ref. 6.2) for an S-COLA. Attachment 7.1 provides the list and regulatory guidance for each of the proposed parts. The scope and controls for each part are discussed below.

Unless otherwise designated, B&V will be responsible for the preparation of the entire Fermi 3 COLA. The cover letter will be prepared by Detroit Edison with support from B&V.

5.2 COLA Part 1 - General Information for Application

In accordance with 10 CFR 50.33 and RG 1.206, section C.IV.5, the COL applicant must address the general and financial information specified in 10 CFR 50.33, "Content of applications; general information." Specifically, B&V (with the input from DTE and GE) will provide the necessary information in Part 1 of the Application including:

- Estimating the total construction costs of the facility and related fuel cycle. Information will show source of funds and reasonable assurance of obtaining funds necessary to cover those costs (10 CFR 50.33(f)(1)).
- Estimating the operation costs for the first five years of operation. Information will show source of funds and reasonable assurance of obtaining funds necessary to cover those costs as well as funds to cover estimated operation costs over the life of the license. (10 CFR 50.33(f)(2)).
- Compiling a list of regulatory agencies that may have jurisdiction over the rates and services of the facility. (10 CFR 50.33(i)).
- Indicating how reasonable assurance will be provided that funds will be available to decommission the facility. (10 CFR 50.33(k)).

Internal and DTE review and approval of the general application information will be conducted in accordance with the guidance in PI 147483.21.2008.

5.3 COLA Part 2 – Final Safety Analysis Report (FSAR)

B&V will prepare a Fermi 3 FSAR based on the ESBWR DCD and the R-COLA. The FSAR will be based on the guidance in section C.III of RG 1.206. The FSAR is required to also have the content as required by 10 CFR 50.34(b). The format of the FSAR as specified in RG 1.206 will include 19 chapters as provided in RG 1.206, section C.III. Additionally, the NRC Reviewer expectations contained in the Standard Review Plans (NUREG-0800) will be used to support the section content. A general outline of the Fermi 3 FSAR is provided in Attachment 7.2. Preparation of the Fermi 3 FSAR will be performed in accordance with PI 147483.21.2008.

There are certain special topics within the preparation of the FSAR which require development as established by the appropriate DCWG approach.

Operational Programs - There are many Operational Programs that will be required prior to operation of the facility. Much of that information will not be available at time of the COL Application submittal and the details will need to be deferred. However, these programs must be “fully described” in sufficient detail in accordance with RG 1.206, section C.I.13.4, C.IV.4 and SECY-05-0197. B&V will coordinate with DTE and the DCWG to provide the necessary information for these Operational Programs. These programs and their requirements for implementation are shown in Attachment 7.3 (reproduced from RG 1.206).

Compliance with Regulatory Criteria –Section C.I.1.9 of Regulatory Guide 1.206 and Chapter 1 of NUREG-0800 require that certain regulatory criteria be addressed at the time of the COL Application. The following four regulatory criteria need to be addressed:

- Regulatory Guides
- Standard Review Plans
- Generic and Unresolved Safety Issues
- Operational Experience (Generic Communications)

The guidance of RG 1.206 states that that compliance be addressed where the DCD for the referenced certified design insofar as they may

impact site-specific portions of the facility design not included in the referenced certified design. The COL applicant should address conformance with each criteria in effect 6 months before the submittal date of the COL application insofar as they pertain to operational aspects of the facility. Per the guidance in RG 1.206 B&V will compile a table showing compliance for the site specific portions of each specified aspect.

Construction Impacts – Section 1.10 of NUREG-0800 requires (1) an evaluation of potential hazards to the SSCs important to safety of the operating units resulting from construction activities and (2) a description of the managerial and administrative controls to be used to provide assurance that the limiting conditions for operation are not exceeded as a result of construction activities at the multi-unit sites. B&V, with the support of DTE, will provide discussion within the FSAR for mitigation of construction impacts on the operating unit.

5.4 COLA Part 3 – Environmental Report

B&V will prepare a Fermi 3 site specific Environmental Report in accordance with 10 CFR 52.79(a)(2) and 10 CFR 51.45.

Regulatory Guide 4.2 provides regulatory guidance for COLAs for the content of an environmental report, even though it was developed for earlier Part 50 licensing and some of the information is outdated. NUREG-1555 provides the current NRC expectations for preparation of the ER. NUREG-1555 was updated in 1999 and individual sections are currently being revised. If timing and project status allows, additional guidance under these revised documents will be considered in the ER application. Preparation of the Fermi 3 ER will be performed in accordance with PI 147483.21.2008.

5.5 COLA Part 4 – Technical Specifications

B&V will include a copy of the GE ESBWR model TSs with additional details necessary to address site specific requirements. Even though specified in FSAR Chapter 16 format, the TSs will be provided as a separate part in the COL Application. 10 CFR Part 52 requires that an applicant for a COL that wishes to reference an approved certified design listed in an appendix to 10 CFR Part 52 include as part of its application plant-specific TS, consisting of the generic and site-specific TS, that are required by 10 CFR 50.36 and 10 CFR 50.36a.

A summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the TS. Deviations from the generic TS bases for a certified design proposed in a COL application will also require an exemption from the referenced design certification rule.

Specifically, B&V, with the support of Excel Services, will take the appropriate site-specific information for the Fermi 3 site and compile a Fermi specific set of TSs and Bases which will be submitted as part of the COLA. Internal and DTE review and approval will be conducted in accordance with the guidance in PI 147483.21.2008.

5.6 COLA Part 5 – Emergency Plan

B&V, with the support of Excel Services, will compile a Fermi 3 Emergency Plan of sufficient detail for COL application per the guidance of RG 1.206, C.III.13.3. Even though required in FSAR 13.3, the COLA stage Emergency Plan will be submitted as a separate part within the COLA. The Emergency plan will “fully describe” the means for coping with emergencies pursuant to Subpart C of 10 CFR Part 52. 10 CFR 52.77, 52.79 and 52.80 also identify requirements related to emergency plans that will be addressed in the COL application. The COL application, which includes the FSAR and other information (e.g., State and local emergency plans), will address the emergency planning requirements contained in RG 1.206, C.III.1, 10 CFR 50.33(g), 10 CFR 50.34(f), and 10 CFR 52.79(a)(21).

As a multiunit site the plan will apply the guidance in RG 1.206, section C.I.13.3.2, *Emergency Plan Considerations for Multiunit Sites* as directed by DTE. Supporting documents for the emergency plan which help establish compliance with the emergency planning standards and requirements (e.g. evacuation time estimates and plume exposure pathway for emergency protection zones) will be prepared and included in Part 11. Internal and DTE review and approval will be conducted in accordance with the guidance in PI 147483.21.2008.

5.7 COLA Part 6 – Site Redress Plan

B&V will develop and submit a Site Redress Plan per the guidance of RG 1.206, section C.IV.6.2. 10 CFR 52.80(c) requires that a site redress plan be included in the COLA if the applicant wishes to be able to perform the Limited Work Activities allowed at the site before issuance of the COL. The plan will demonstrate that an environmentally stable and aesthetically acceptable site is achieved to conform to local zoning laws.

In general, the site redress plan will describe the status of the site and general site stabilization activities that would be in progress (e.g., site drainage, excavation, grading, seeding), as well as a description and status of the major facilities of the site (e.g., power block area, access roads, laydown areas, cooling ponds, transmission corridor). The site redress plan will also discuss the final condition of each part of the major facilities (e.g., abandonment of buildings, removal of utilities, and removal of debris). To the extent applicable, plan will be prepared and reviewed in accordance with PI 147483.21.2008.

5.8 COLA Part 7 – DCD Departures Report

If DCD departures are determined necessary, B&V will compile a report for departures from the referenced certified design per the guidance of RG 1.206, section C.III.1.6. Even though Chapter 1 of the FSAR is to include a list or table of departures, it is planned that the departures report will be submitted as a separate part of the COLA. Per RG 1.206, applicants should provide sufficient information for the NRC to resolve all safety and security issues in its review of the departure. Departures from the NRC approved ESBWR Tier 1 DCD are considered regulations and

will require exemption under 10 CFR 50.12. Other departures are addressed under a 10 CFR 50.59-like process. Section C.IV.3 of RG 1.206 includes information on the applicable design certification change processes. In addition, the departures report will identify or uniquely designate the information provided in the application, which is a departure from the referenced certified design.

If a Tier 1 DCD departure is identified, B&V will prepare the supporting documentation necessary for seeking and exemption for DTE submittal. If a Tier 2 change is necessary, B&V will prepare the basis for a Process Applicability and/or 50.59 review per DTE guidance.

5.9 COLA Part 8 – Safeguards/Security Plan

B&V will prepare a Security and Safeguards Contingency Plans per RG 1.206, section C.I.13.6.1. This section of the COL application will include a discussion indicating that a security plan has been prepared and submitted separately to the NRC. The security plan will be based on the existing Fermi 2 plan which will include a description of the elements of the individual security plans (e.g., physical security, training and qualification, and safeguards contingency), as required by 10 CFR 73.55. The NRC considers the guidance provided in NEI 03-12 to be acceptable and has endorsed it. Therefore, the Fermi 3 security plan will also be consistent with NEI 03-12. Additionally, the security plan for the COL stage will describe the proposed site security provisions implemented during construction of a new plant that is either inside an existing protected area or an owner-controlled area.

The Fermi 3 Security and Safeguards Contingency Plans will be prepared under the requirements of B&V NP 6.2 (Ref. 6.8). To the extent applicable, these plans will be prepared and reviewed in accordance with PI 147483.21.2008.

5.10 COLA Part 9 – Reserve/Submittal of Sensitive and Proprietary Information

If a COLA document contains information that is deemed Sensitive Unclassified Non-Safeguards Information (SUNSI), it may be electronically submitted via the Electronic Information Exchange (EIE) process available on the NRC's "Electronic Submittals" Web page or on Optical Storage Media (OSM). Similarly, information that is considered proprietary in accordance with 10 CFR 2.390 which is to be withheld from public disclosure to protect the interests of the author will be included in this part. References in Attachment 7.1 provide guidance for submittal of sensitive information.

The specific process for submitting sensitive and proprietary information will be determined prior to the application. B&V will keep this section in reserve for compiling the documents as Part 9 of the COL application.

5.11 COLA Part 10 – Inspections, Tests, Analyses, and Acceptance Criteria

B&V will prepare a separate listing of the Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) per RG 1.206, section C.II.1. In Section 14.3 of the FSAR, the COL applicant is to provide its proposed methodology for developing ITAAC for the facility, as well as its proposed criteria for establishing the necessary and sufficient acceptance criteria in accordance with 10 CFR 52.80(a).

The requirements in 10 CFR 52.80(a) specify that a COL application must include the proposed ITAACs (including those that apply to emergency planning) that the licensee shall perform and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria are met, the facility has been constructed and will operate in conformity with the COLA. Because successful completion of all ITAAC is a prerequisite for fuel load and a condition of the license, ITAAC will no longer exist after the Commission makes its finding in accordance with 10 CFR 52.103(g) and authorizes fuel load. Therefore, the COL application section containing the ITAAC will not become part of the facility's FSAR. The ITAACs will be prepared and reviewed in accordance with PI 147483.21.2008 as part of the FSAR.

5.12 COLA Part 11 – COLA Enclosures

B&V will compile additional information that supports the COL Application but is not necessarily contained within Parts 1 through 10. This information may include studies that were performed for other COLA activities (i.e. evacuation time estimates, state agency agreements, information incorporated by reference) which will aid NRC review. A more complete list of possible enclosures is provided in Attachment 7.1.

5.13 Scheduling of COLA Deliverables

B&V will develop a logic schedule for COLA section and document development which will be based on a DCWG R-COLA application for the selected technology. B&V will use Primavera (P-3) software. Draft deliverables will be provided to Detroit Edison for review and approval as established in the P-3 schedule.

5.14 COLA Information Accuracy

B&V will provide reasonable assurance that the Fermi COLA is complete and accurate. 10 CFR 50.9 has been established to ensure that communications to the NRC by licensees are complete and accurate in all material respects. The regulations contained in 10 CFR 50.9 also apply to information prepared in support of the COL Application under 10 CFR 52. Based on the nature of the information being prepared and submitted to the NRC, various means may be used to validate submittal accuracy. The specific means for performing document validation will be established in separate B&V instructions. Project Instruction 21.147483.2009 provides additional guidance on documenting information accuracy.

5.15 COLA Document for Submittal to the NRC

B&V will provide the Fermi 3 COLA in a format that is consistent with the R-COLA, once determined, and NRC guidance. Section C.IV.2 of RG 1.206 provides the NRC suggested method(s) for submittal of the COLA to the NRC. The COLA will be in a form and format suitable for submission to the NRC. Reference 6.7 provides guidance for making submittals of COLAs to the NRC.

6.0 REFERENCES

- 6.1 Project Management Memorandum 147483.21.1000, "Detroit Edison (Fermi) COL Application Preparation"
- 6.2 Regulatory Guide 1.206, "Combined License Applications for Nuclear Power Plants" (June 2007)
- 6.3 NUREG-0800, Standard Review Plan (SRP) for the Review of Safety Analysis Reports for Nuclear Power Plants
- 6.4 NUREG-1555, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants"
- 6.5 Regulatory Guide 4.2, "Preparation of Environmental Reports for Nuclear Power Stations," Revision 2
- 6.6 SECY-05-0197, "Review of Operational Programs in a COLA and Generic Emergency Planning ITAACs", October 28, 2005
- 6.7 Guidance for Electronic Submissions to the NRC, June 6, 2007
- 6.8 NP 6.2, Control of Safeguards Information for Nuclear Power Plants
- 6.9 Project Instruction 147483.21.2008, Fermi 3 COLA Process Workflow for Preparing Site-Specific FSAR and ER Sections
- 6.10 Project Instruction 147483.21.2009, Fermi 3 COLA Supporting Documentation Process

7.0 ATTACHMENTS

- 7.1 Proposed Parts of the Fermi COL Application Package
- 7.2 Format and Contents of the Fermi FSAR
- 7.3 Operational Programs Required for the Fermi COLA

Attachment 7.1 Proposed Parts of the Fermi COLA Package

The following table contains informational requirements that cover various R-COLA applications and may contain information that is not specific to Fermi 3. However, this table generally represents the COL Application scope and regulatory basis.

Part No.	COLA Part Content	Regulation / Guidance Document
Cover Letter	Cover Letter(s) , include: <ul style="list-style-type: none"> • Oath or Affirmation • Listing of CD (or DVD) Contents (List of COLA Parts) • LWA Requests (if any) • List of Changes (Amendments only) • List of Documents Incorporated by Reference • Reference plant identification • Contact for RAIs • Subsequent plant id of New standard material • Schedule considerations <ul style="list-style-type: none"> ○ Freeze date re: DCD rev and TRs • Contact for procurement info • Reference other submittal letters (if not complete) • Explain special COLA annotations <ul style="list-style-type: none"> ○ Address use of electronic links (if any) • Identification of Addressed ITAAC/DAC • Affidavits for Withheld Info in Part 9 	<ul style="list-style-type: none"> • 10 CFR 52.75(b) > 50.30(b) • Electronic Submittal Guidance • 10 CFR 52.7 & 52.93 & DCR §VIII • RG 1.206, C.IV.6 (LWA) • 10 CFR 50.32 • RIS 2006-006, RIS 2007-008 • AP1000 DCWG Mtg -20070413 • Joint DCWG Mtg - 20070323 • SECY 2006-0187 SRM AP1000 DCWG Mtg -20070410 • 10 CFR 52.73(b) • 10 CFR 2.101(a)(5) • Joint DCWG Workshop - 20070202 <ul style="list-style-type: none"> ○ RG 1.206, C.IV.2 • RG 1.206 Workshop 20070419 • 10 CFR 2.390
Part 1	General and Administrative Information , including: <ul style="list-style-type: none"> • Construction costs • Operational costs • Decommissioning costs • Construction schedule window 	<ul style="list-style-type: none"> • 10 CFR 52.77 > 50.33 • 10 CFR 50.75 • RG 1.206, C.IV.5
Part 2	Final Safety Analysis Report <ul style="list-style-type: none"> • Incorp. by Reference DC Rule – 1.1 • References to appropriate DCD section(s) • COL Info Item cross-reference (DCD) – 1.8 • Confirm design within SCs • Confirm site characteristics within SPs of DCD – 2.0 • Ops Programs table - 13.4 (see also Attachment 7.3) • Fitness for Duty – 13.7 • Table of ITAAC Cross-references – 14.3 • ITAAC Design Details (w/ ITAAC – see Part 10) • Construction Impacts Info – 1.10/1.12 • Construction Related (other) Info – end of subsection • Withheld Info – See Part 9 	<ul style="list-style-type: none"> • 10 CFR 52.79(a) and (b) • 10 CFR 52.79(a), (b), and (d) • CDR §III.A/B • RG 1.206, C.III.4.2 • 10 CFR 52.79(b)(1) • 10 CFR 52.79(d) • 10 CFR 52.79(b)(3) • RG 1.206, C.III.1 – 13.4 • Joint DCWG Meeting 20070503 • RG 1.206, C.II.1.1 • RG 1.206, C.II.1.1 • RG 1.206, C.I.1- 1.10 • RG 1.206, Numerous sections • NUREG-0800

Part 3	Environmental Report <ul style="list-style-type: none"> • Determine overall impact of construction and operation of the new facility • Address DOE Fuel Contract – Ch 1 list/table • Withheld Info – See Part 9 	<ul style="list-style-type: none"> • 10 CFR 52.79(a)(1) • 10 CFR 51.50(c)(1) and (2) • 10 CFR 50.80(c) • RG 1.206, C.II.2, C.III.1 - C.III.3 • NUREG-1555 • RG 4.2 • 10 CFR 961
Part 4	Technical Specifications <ul style="list-style-type: none"> • Tech Specs • Bases • Application of TS selection criteria for site-specific SSCs • Supporting Justifications Document 	<ul style="list-style-type: none"> • 10 CFR 52.79(a)(30) • 10 CFR 50.33(f)(3) • 10 CFR 50.36 • RG 1.206, C.I.16, C.III.1/2 - 16 • DCR §VIII.C.4
Part 5	Emergency Plan <ul style="list-style-type: none"> • Differences from ESP approved Plans • EP Certifications • Guidance cross-references • Withheld Info – See Part 9 	<ul style="list-style-type: none"> • 10 CFR 52.79(a)(21) > 50.47 & App E • 10 CFR 52.79(a)(22) • 10 CFR 52.79(b)(4) • RG 1.206, C.III.1, Chapter 13.3 • RG 1.206, C.III.2, Chapter 13
Part 6*	Site Redress Plan for LWA Request <ul style="list-style-type: none"> • Site Redress Plan • Reference to portions of Environmental Report • Reference to portions of Final Safety Analysis Report • Reference to QA Plan • Withheld Info – See Part 9 	<ul style="list-style-type: none"> • 10 CFR 50.10 • RG 1.206, C.IV.6
Part 7	Generic DCD Departures Report <ul style="list-style-type: none"> • Departures (discussion and justification) Exemption Requests such as: <ul style="list-style-type: none"> • OM Code for Valve Testing • ASME ISI Code 	<ul style="list-style-type: none"> • DCR §IV.A.2.b & X.B.3.a • RG 1.206, C.III.2.6 • 10 CFR 52.39(b) & 52.93 • 10 CFR 52.79(a)(23) & 52.80(d) • 10 CFR 50.55a(a)(3) alternative
Part 8	Safeguards/Security Plans (Safeguards Information) <ul style="list-style-type: none"> • Plant Specific SP (NEI 03-12) – SP, SCP, TP • Interim Compensatory Measure Report • Safeguards Report • DCD Safeguards Info 	<ul style="list-style-type: none"> • 10 CFR 52.79(b) • 10 CFR 52.79(a)(35) and (36) • 10 CFR 50.34(c) and (d) • RG 1.206, C.III.1, Chapter 13 • RG 1.206, C.III.1, Chapter 13.6 • DCR §IV.A.3, “physically include”

Part 9	Withheld Information (Proprietary, Sensitive, & SUNSI) <ul style="list-style-type: none"> • Withheld Info – Presented by various Parts • Affidavit for each document from owner 	<ul style="list-style-type: none"> • 10 CFR 2.390 • RIS 2005-26 • RIS 2005-31 • RIS 2007-04 • SECY 2004-0191
Part 10	ITAAC, Closures, and Other Proposed License Conditions <ul style="list-style-type: none"> • IBR DCD Tier 1 ITAAC • • New Emergency Planning ITAAC • New Security Hardware ITAAC • Other plant- or site-specific ITAAC (if any) • ITAAC Design Descriptions • ITAAC Completion Notifications • Proposed License Conditions <ul style="list-style-type: none"> ○ DCD Holder items ○ Other commitments ○ EP offsite responsibilities ○ EP offsite exercise deficiencies ○ EPIP submittal ○ ITAAC ○ Operational Programs & procedure availability (SECY) ○ FP, Security, ○ Ops Program Implementation <ul style="list-style-type: none"> ▪ EQ, Rx VMS, PST, FP, RECP, ODCM, REMP, PCP, RP, ▪ Rx Op Training, PSP, SCP, GFT&Q, MOV Testing, SU ○ Close open PS-TS brackets (if any) ○ CWA Certification prior to work 	<ul style="list-style-type: none"> • 10 CFR 52.80(a) • 10 CFR 52.79(d)(3) • 10 CFR 52.79(b)(3) • RG 1.206, C.II.1 and C.III.7.3 • RG 1.206, C.II.1 and C.III.7.4 • 10 CFR 52.79(a)(36)(iv) • RG 1.206, C.II.1 and C.III.7.2 • RG 1.206, C.II.1.1 • 10 CFR 52.80(a)(3) <ul style="list-style-type: none"> ○ AP1000 DCWG Mtg 20070614 ○ RG 1.206, C.III.1 – 14.3 ○ RG 1.206, C.II – Table C.II.1-B1, Note 4 ○ RG 1.206, C.II – Table C.II.2-B1, 14.1.3 ○ RG 1.206, C.III.1 – 13.3.1 ○ RG 1.206, C.III.4.3 ○ RG 1.206, C.IV.4.1 & C.IV.4.3 & 13.5 ○ RG 1.206, C.III.1 – T13.4-1, 8,15 ○ RG 1.206, C.III.1 – T13.4-1 ○ RG 1.206, C.III.1 – T13.4-1, 3,5,6,8,9,10 ○ RG 1.206, C.III.1 – T13.4-1, 12,15,18,19 ○ Clean Water Act §401
Part 11	COLA Enclosures [or electronic “Reference Documents”]	Electronic Submittal Guidance
11A	Quality Assurance Plan Description - IBR via FSAR Chapter 17	<ul style="list-style-type: none"> • 10 CFR 52.79(a)(25) • RG 1.206, C.III.1, Chapter 17
11B	Referenced Generic DCD (Exemption for ADAMS version IBR) <ul style="list-style-type: none"> • - IBR via FSAR & ER sections 	<ul style="list-style-type: none"> • RG 1.206, C.IV.2.2 • DCR § IV.A.2.a “include”????

11C	Copy of State Government Emergency Plan - IBR via Part 0 (Cover Letter) • With proposed Site modifications • With State Government Certifications	• 10 CFR 52.79(d) • 10 CFR 52.79(a)(21) • 10 CFR 52.79(a)(22)
11D	Copy of Local Government Emergency Plan - IBR via Part 0 (Cover Letter) • With proposed Site modifications • With Local Government Certifications	• 10 CFR 52.79(d) • 10 CFR 52.79(a)(21) • 10 CFR 52.79(a)(22)
11E	Copy of Evacuation Time Estimate used for EP Copy of cross-reference to applicable EP criteria • regulatory requirements, guidance documents, generic communications, and other	• RG 1.206, C.III.1 - 13.3.1 • RG 1.206, C.III.1 - 13.3.1
11F	Copy of other NEI completed templates... - IBR via appropriate COLA Part	• 10 CFR 50.32
11G	Copy of Technical Reports... Incorporated by Reference - IBR via appropriate COLA Part 2 section	• 10 CFR 50.32
11H	Copy of other Incorporated by Reference Documents	• 10 CFR 50.32

Attachment 7.2 Format and Contents of the Fermi FSAR

The following format is for the ESBWR based on the North Anna R-COLA as modified for Fermi 3.

Section	Title	Standardization Matrix Assessment
FSAR Chapter 1 – Introduction and General Description		
1.1	Introduction	Standard with Site Specific (2)
1.2	General Plant Description	Standard with Site Specific (1)
1.3	Comparison Tables	Standard with Site Specific (1)
1.4	Identification of Agents and Contractors	Standard with Site Specific (2)
1.5	Requirements for Further Technical Information	Incorporated by Reference
1.6	Material Incorporated by Reference	Standard with Site Specific (2)
1.7	Drawings and Other Detailed Information	Standard with Site Specific (1)
1.8	Interfaces for Standard Design	Standard with Site Specific (2)
1.9	Conformance with Regulatory Criteria	Standard with Site Specific (2)
1.9.1	Conformance with Regulatory Guides	Standard with Site Specific (2)
1.9.2	Conformance with the Standard Review Plan	Standard with Site Specific (2)
1.9.3	Generic Issues	Standard with Site Specific (2)
1.9.4	Operational Experience	Standard with Site Specific (2)
1.10	Summary of COL Items	Standard with Site Specific (2)
1.11	Technical Resolutions	Standard with Site Specific (2)
1.12	Construction Impacts	Site Specific
1A	TMI Responses	Standard
1B	Plant Shielding	Incorporated by Reference
1C	Industry Operating Experience	Standard
FSAR Chapter 2 – Site Characteristics		
2.1	Geography and Demography	Site Specific
2.2	Nearby Industrial, Transportation, and Military Facilities	Site Specific
2.3	Meteorology	Site Specific
Section 2.4 – Hydrologic Engineering		
2.4.1	Hydrologic Description	Site Specific
2.4.2	Floods	Site Specific
2.4.3	Probable Maximum Flood on Streams and Rivers	Site Specific
2.4.4	Potential Dam Failures	Site Specific

Section	Title	Standardization Matrix Assessment
2.4.5	Probable Maximum Surge and Seiche Flooding	Site Specific
2.4.6	Probable Maximum Tsunami Flooding	Site Specific
2.4.7	Ice Effects	Site Specific
2.4.8	Cooling Water Canals and Reservoirs	Site Specific
2.4.9	Channel Diversions	Site Specific
2.4.10	Flooding Protection Requirements	Site Specific
2.4.11	Low Water Considerations	Site Specific
2.4.12	Groundwater	Site Specific
2.4.13	Accidental Release of Liquid Effluents	Site Specific
2.4.14	Technical Specification and Emergency Operation Requirements	Site Specific
Section 2.5 - Geology, Seismology, and Geotechnical Engineering		
2.5.1	Basic Geologic and Seismic Information	Site Specific
2.5.2	Vibratory Ground Motion	Site Specific
2.5.3	Surface Faulting	Site Specific
2.5.4	Stability of Subsurface Materials and Foundations	Site Specific
2.5.5	Stability of Slopes	Site Specific
FSAR Chapter 3 – Design of Structures, Components, Equipment, Systems		
3.1	Conformance with NRC General Design Criteria	Incorporated by Reference
3.2	Classification of Structures, Systems, and Components	Standard
3.3	Wind and Tornado Loadings	Incorporated by Reference
3.4	Water Level (Flood) Design	Incorporated by Reference
3.5	Missile Protection	Standard
3.6	Protection Against Dynamic Effects	Standard
3.7	Seismic Design	Standard with Site Specific (2)
3.8	Seismic Category I Structures	Incorporated by Reference
3.9	Mechanical Systems and Components	Standard with Site Specific (1)
3.10	Seismic and Dynamic Qualification	Standard
3.11	Environmental Qualification	Standard
3.12	Piping Design Review	Standard
3.13	Threaded Fasteners	Standard
3A	Seismic Soil Structure Interaction	Standard with Site Specific (1)
App 3B-3L	Misc	Incorporate by Reference

Section	Title	Standardization Matrix Assessment
FSAR Chapter 4 – Reactor		
4.1	Summary Description	Incorporated by Reference
4.2	Fuel System Design	Standard
4.3	Nuclear Design	Standard
4.4	Thermal and Hydraulic Design	Incorporated by Reference
4.5	Reactor Materials	Incorporated by Reference
4.6	Functional Design of Reactivity Control System	Incorporated by Reference
App 4A	Typical Rod Patterns and Power Distribution	Standard
App 4B-D	Misc	Incorporated by Reference
FSAR Chapter 5 – Reactor Coolant System and Connected Systems		
5.1	Summary Description	Incorporated by Reference
5.2	Integrity of Reactor Coolant Pressure Boundary	Standard
5.3	Reactor Vessels	Standard
5.4	Component and Subsystem Design	Standard
FSAR Chapter 6 – Engineered Safety Features		
6.0	Engineered Safety Feature General	Incorporated by Reference
6.1	Engineered Safety Feature Materials	Standard
6.2	Containment Systems	Standard
6.3	Emergency Core Cooling Systems	Incorporated by Reference
6.4	Control Room Habitability Systems	Standard with Site Specific (2)
6.5	Atmosphere Cleanup Systems	Incorporated by Reference
6.6	ISI of Class 2 and 3 Components	Standard
6A-6C	Misc	Incorporated by Reference
FSAR Chapter 7 – Instrumentation and Controls		
7.1	Introduction	Incorporated by Reference
7.2	Reactor Trip System	Incorporated by Reference
7.3	Engineered Safety Features Systems	Incorporated by Reference
7.4	Safety-Related and Non-Safety Related Shutdown Systems	Incorporated by Reference
7.5	Safety-Related and Non-Safety Related Information Systems	Incorporated by Reference
7.6	Interlock Systems	Incorporated by Reference
7.7	Control Systems	Incorporated by Reference
7.8	Diverse Instrumentation and Control Systems	Incorporated by Reference

Section	Title	Standardization Matrix Assessment
7.9	Deleted	
App 7A	Deleted	
App 7B	Software Quality Program	Incorporated by Reference
FSAR Chapter 8 – Electric Power		
8.1	Introduction	Standard with Site Specific (1)
8.2	Offsite Power System	Standard with Site Specific (2)
8.3	Onsite Power Systems	Standard with Site Specific (1)
App 8A	Misc Electrical Systems	Standard with Site Specific (1)
FSAR Chapter 9 – Auxiliary Systems		
9.1	Fuel Storage & Handling	Standard
Section 9.2 - Water Systems		
9.2.1	Plant Service Water System	Standard with Site Specific (2)
9.2.2	Reactor Component Cooling Water System	Incorporated by Reference
9.2.3	Makeup Water System	Standard with Site Specific (2)
9.2.4	Potable and Sanitary Water Systems	Standard with Site Specific (2)
9.2.5	Ultimate Heat Sink	Standard
9.2.6	Condensate Storage and Transfer System	Standard
9.2.7	Chilled Water System	Incorporated by Reference
9.2.8	Turbine Component Cooling Water System	Incorporated by Reference
9.2.9	Hot Water Systems	Incorporated by Reference
9.2.10	Station Water System	Standard with Site Specific (2)
Section 9.3 - Process Auxiliaries		
9.3.1	Compressed Air Systems	Incorporated by Reference
9.3.2	Process Sampling System	Standard
9.3.3	Equipment and Floor Drain System	Incorporated by Reference
9.3.4	Chemical and Volume Control System	Incorporated by Reference
9.3.5	Standby Liquid Control System (BWR)	Standard
9.3.6	Instrument Air System	Incorporated by Reference
9.3.7	Service Air System	Incorporated by Reference
9.3.8	High Pressure Nitrogen Supply System	Incorporated by Reference
9.3.9	Hydrogen Water Chemistry System	Standard with Site Specific (1)
9.3.10	Oxygen Injection System	Standard with Site Specific (2)
9.3.11	Zinc Injection System	Standard
9.3.12	Auxiliary Boiler System	Incorporated by Reference

Section 9.4 - Air Conditioning, Heating, Cooling, and Ventilation Systems		
9.4.1	Control Room Area Ventilation System	Incorporated by Reference
9.4.2	Fuel Building HVAC System (FBHVS)	Incorporated by Reference
9.4.3	Radwaste Building Heating, Ventilation and Air Conditioning System	Incorporated by Reference
9.4.4	Turbine Building HVAC System	Incorporated by Reference
9.4.5	Engineered Safety Feature Ventilation System	Incorporated by Reference
9.4.6	Rx Bldg HVAC	Incorporated by Reference
9.4.7	Electrical Bldg HVAC	Incorporated by Reference
9.4.8	Drywell Cooling	Incorporated by Reference
9.4.9	Containment Inerting	Incorporated by Reference
9.4.10	HVAC Component Information	Incorporated by Reference
Section 9.5 - Other Auxiliary Systems		
9.5.1	Fire Protection System	Standard with Site Specific (2)
9.5.2	Communications Systems	Standard with Site Specific (2)
9.5.3	Lighting System	Incorporated by Reference
9.5.4	Diesel Generator Fuel Oil Storage and Transfer System	Standard with Site Specific (1)
9.5.5	Diesel Generator Jacket Cooling Water System	Incorporated by Reference
9.5.6	Diesel Generator Starting Air System	Incorporated by Reference
9.5.7	Diesel Generator Lubrication System	Incorporated by Reference
9.5.8	Diesel Generator Combustion Air Intake and Exhaust System	Incorporated by Reference
9A	Fire Hazards Analysis Yard, SW Pump House, etc. FP & Yard Piping Lighting, Fuel Oil, etc.	Standard with Site Specific (2)
9B	Summary of Analysis Supporting Fire Protection Design Requirements	Incorporated by Reference
FSAR Chapter 10 – Steam and Power Conversion Systems		
10.1	Summary Description	Incorporated by Reference
10.2	Turbine Generator	Standard
10.3	Turbine Main Steam System	Incorporated by Reference
10.4	Other Features of Steam and Power Conversion System	Standard with Site Specific (2)
FSAR Chapter 11 – Radioactive Waste Management		
11.1	Source Terms	Incorporated by Reference
11.2	Liquid Waste Management System	Standard
11.3	Gaseous Waste Management System	Standard

11.4	Solid Waste Management System	Standard
11.5	Process Radiation Monitoring System	Standard
FSAR Chapter 12 – Radiation Protection		
12.1	Ensuring That Occupational Radiation Exposures Are ALARA	Standard
12.2	Plant Sources	Standard with Site Specific (2)
12.3	Radiation Protection	Standard
12.4	Dose Assessment	Standard with Site Specific (1)
12.5	Operational Radiation Protection Program	Standard
12.6	Minimization of Contamination and Radwaste Generation	Standard
12A	Calc for Airborne Radioactivity	Incorporated by Reference
FSAR Chapter 13 – Conduct of Operations		
13.1	Organizational Structure of Applicant	Standard with Site Specific (2)
13.2	Training	Standard
13.3	Emergency Planning	Standard
13.4	Review and Audit (Operational Programs Required by Regulation)	Standard with Site Specific (1)
13.5	Plant Procedures	Standard
13.6	Physical Security	Standard with Site Specific (1)
13.6	Fitness for Duty	Standard
FSAR Chapter 14 Initial Program and ITAAC		
14.1	Deleted	Incorporated by Reference
14.2	Initial Plant Test Program For Final Safety Analysis Reports	Standard with Site Specific (1)
14.3	ITAACs	Standard
FSAR Chapter 15 – Safety Analyses		
15.0	Analytical Approach	Incorporated by Reference
15.1	Nuclear Safety Operational Analysis	Incorporated by Reference
15.2	Analysis of Anticipated Operational Occurrences	Incorporated by Reference
15.3	Analysis of Infrequent Events	Standard
15.4	Analysis of Accidents	Incorporated by Reference
15.5	Special Event Evaluations	Incorporated by Reference
App 15A -15B	Misc	Incorporated by Reference
FSAR Chapter 16 – Technical Specifications		
16.0	Plant Specific Technical Specifications	Standard

FSAR Chapter 17 – Quality Assurance		
17.0	Introduction	Standard
17.1	Quality Assurance During Design and Construction	Standard
17.2	Quality Assurance During the Operations Phase	Standard
17.3	Quality Assurance Program Document	Standard
17.4	Reliability Assurance Program During Design Phase	Standard
17.5	Quality Assurance Program Document	Standard with Site Specific (1)
17.6	Maintenance Rule	Standard
FSAR Chapter 18 – Human Factors Engineering		
18.1	Overview	Incorporated by Reference
18.2	HFE Program Management	Incorporated by Reference
18.3	Operating Experience Review	Incorporated by Reference
18.4	Functional Requirements Analyses Allocation	Incorporated by Reference
18.5	Task Analysis	Incorporated by Reference
18.6	Staffing and Qualifications	Incorporated by Reference
18.7	Human Reliability Analysis	Incorporated by Reference
18.8	Human-System Interface Design	Incorporated by Reference
18.9	Procedure Development	Incorporated by Reference
18.10	Training Program Development	Incorporated by Reference
18.11	Human Factors V&V	Incorporated by Reference
18.12	Design Implementation	Incorporated by Reference
18.13	Human Performance Monitoring	Incorporated by Reference
18.14	Inventory of Controls and Instrumentation	Incorporated by Reference
FSAR Chapter 19 – PRA and Severe Accidents		
19.1	Introduction and Summary	Incorporated by Reference
19.2	PRA Summary and Results	Standard
19.3	Severe Accident Management	Incorporated by Reference
19.4	PRA Insights Affecting ESBWR Design	Incorporated by Reference
19.5	Conclusions	Standard with Site Specific (1)
19.6	Regulatory Treatment of Non-Safety Systems	Incorporated by Reference
19A-19C	Misc	Incorporated by Reference

(1)– Standard section that contains a limited amount of site specific information

(2)– Standard section that contains a moderate amount of site specific information

Attachment 7.3

Operational Programs Required for COLA

The following operational programs will either be tentatively part of the referenced plant design as denoted with (D) or will need to be established by B&V as noted with (B)

Item	Program Title	Program Source (Required By)	FSAR Section	Implementation		
				Milestone	Requirement	NEI Guides
1	Inservice Inspection Program (D)	10 CFR 50.55a(g)	5.2.4 6.6	Commercial service	10 CFR 50.55a(g) ASME Section XI IWA 2430(b)	----
2	Inservice Testing Program (D)	10 CFR 50.55a(f) 10 CFR 50, App. A	3.9.6 5.2.4	After generator online on nuclear heat	10 CFR 50.55a(f) ASME OM Code	----
3	Motor-Operated Valve Testing (D)	10 CFR 50.55a(b)(3)(ii)	3.9.6	None specified	License Condition	----
4	Preservice Testing Program (D)	10 CFR 50.55a(f)	3.9.6	None specified	License Condition	----
5	Environmental Qualification Program (D)	10 CFR 50.49(a)	3.11	None specified	License Condition	----
6	Preservice Inspection Program (D)	10 CFR 50.55a(g)	5.2.4 6.6	Completion prior to initial plant startup	10 CFR 50.55a(g) ASME Code Section XI IWB-2200(a)	----
75	Rx Vessel Material Surveillance Program (D)	10 CFR 50.60 10 CFR 50, App. H	5.3.1	None specified	License Condition	----
8	Containment Leakage Rate Testing Program (D)	10 CFR 50.54(o) 10 CFR 50, App. A (GDC 32) 10 CFR 50, App. J 10 CFR 52.47(a)(1)	6.2.6	Fuel load	10 CFR Part 50, App. J Option A-Section III Option B-Section III.A	----
9	Fire Protection Program (D)	10 CFR 50.48	9.5.1	None specified	License Condition	----
10	Process and Effluent Monitoring and Sampling Program:					
10a	Cost-Benefit Analysis for RW Systems (B)	10 CFR 50, App. I, Section II.D	11.2 11.3	None Specified	License Condition	NEI 07-11 IBR
10b	Radiological Effluent TSSs/Standard Radiological Effluent Controls (B)	10 CFR 20.1301 and 20.13.2 10 CFR 50.34a 10 CFR 50.36a 10 CFR 50, App. I,	11.5	None specified	License Condition	NEI 07-09 IBR

Item	Program Title	Program Source (Required By)	FSAR Section	Implementation		
				Milestone	Requirement	NEI Guides
		Sect. II and IV				
10c	Offsite Dose Calculation Manual (B)	Same as above	11.5	None specified	License Condition	NEI 07-09 IBR
10d	Radiological Environmental Monitoring Program (B)	Same as above	11.5	None specified	License Condition	NEI 07-09 IBR
10e	Process Control Program (B)	Same as above	11.4	None specified	License Condition	NEI 07-10 IBR
11	Radiation Protection Programs					
11a	ALARA Program (B)	10 CFR 20.1101(b)	12.1	None specified	License Condition	NEI 07-08 IBR
11b	Radiation Protection Program (B)	10 CFR 20.1101	12.5	None specified	License Condition	NEI 07-03 IBR
12	Operator Training Programs					
12a	Non-licensed Plant Staff Training Program (B)	10 CFR 50.120 10 CFR 52.78	13.2.2	18 mos. prior to scheduled fuel load	10 CFR 50.120(b)	NEI 06-13A IBR
12b	Reactor Operator Training Program (B)	10 CFR 55.13 10 CFR 55.31 10 CFR 55.41, 43, 45	13.2.1	None specified	License Condition	NEI 06-13A IBR
12c	Reactor Operator Requalification Program (B)	10 CFR 50.34(b) 10 CFR 50.54(i) 10 CFR 55.59	13.2.1	Within 3 mos. after issuance of license or the date, the NRC makes the finding under 10 CFR 52.103(g)	Proposed 10 CFR 50.54(i-1)	NEI 06-13A IBR
13	Emergency Plan (B)	10 CFR 50.47 10 CFR 50, App. E	13.3	Full exercise w/i 2 yrs of lic Onsite exer w/i 1 yr of license Detailed implementing procedures w/i 1 yr of license	Proposed 10 CFR Part 50, App. E.IV.F.2a(i), etc.	NEI 07-01 (EALs) Full Text incorporation
14	Security Program					
14a	Physical Security Program (B)	10 CFR 50.34(c) 10 CFR 73.55, 56, 57 10 CFR Part 26	13.6	None specified	License Condition	NEI 03-12 Implement template

Item	Program Title	Program Source (Required By)	FSAR Section	Implementation		
				Milestone	Requirement	NEI Guides
14b	Safeguards Contingency Program (B)	10 CFR 50.34(d) 10 CFR 73, App. C	13.6	None specified	License Condition	NEI 03-12 Implement template
14c	Training and Qualification Program (B)	10CFRPart 73, App. B	13.6	None specified	License Condition	NEI 03-12 Implement template
15	Fitness for Duty Program (B)	10 CFR 26	13.7	None specified	License Condition	NEI 06-06 IBR
16	Initial Test Program (D)	10 CFR 50.34 10 CFR 52.79(a)(28)	14.2	None specified	License Condition	----
17	Quality Assurance Program— Operation (B)	10 CFR 50.54(a) 10 CFR 50, App. A (GDC 1); 10CFR 50, App. B	17.5	30 days prior to scheduled date for the initial loading of fuel	Proposed 10 CFR 50.54(a)(1)	NEI 06-14A Full text incorporation
18	Maintenance Rule (B)	10 CFR 50.65	17.6	Fuel load authorization per 10 CFR 52.103(g)	Proposed 10 CFR 50.65(a)(1)	NEI 07-02 IBR