



U.S. NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

**PART 52 LICENSING AND
IMPLEMENTATION LESSONS LEARNED
ACTION PLANS**

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NRO Self-Assessment Reports

- Part 52 Licensing Lessons Learned (ML13059A239)
- Part 52 Post-COL Implementation Lessons Learned (ML13196A403)
- Several others (cROP annual assessments, Vendor Inspection self-assessments, etc)



Licensing Lessons Learned Action Plan

Lesson 1: Quality of Applications

- Update NRO acceptance review office instruction: NRO-REG-100
- Communicate update to applicants
- Develop NRO readiness review office instruction



Licensing Lessons Learned Action Plan

Lesson 2: New Reactor Review Guidance

- Considering update to COL application content guidance: RG-1.206
- Verify SRP update process
- Considering update to environmental SRP: NUREG-1555
- Issue and finalize interim staff guidance for reactor environmental reviews: COL/ESP-ISG-026; and iPWR environmental reviews: COL/ESP-ISG-027



Licensing Lessons Learned Action Plan

Lesson 3: Design Standardization

- Incorporate ISG-11, “Finalizing Licensing-Basis Information,” into RG 1.206

Lesson 4: Identification and Resolution of Technical Issues

- Update COL application content guidance: RG-1.206
- Verify SRP update process



Licensing Lessons Learned Action Plan

Lesson 5: Knowledge Management

- Enhance search capability in the electronic request for additional information system (eRAI)
- Enhance tracking of RAIs through eRAI system update
- Update NRO RAI Office Instruction: NRO-REG-101

Lesson 6: Application Timing and Sequencing

- Update NRO rulemaking Office Instruction, NRO-REG-114 , to include streamlined design certification rulemaking



Licensing Lessons Learned Action Plan

Lesson 7: Updates to Regulations

- Part 52 lessons learned rulemaking – Commission paper in development.



Post-COL Lessons Learned

Lesson 1: Tier 2* Information Clarity

- Update NUREG-0800, (Standard Review Plan), section 14.3 with new definition of Tier 2*
- Implement during DCD reviews
- Continue discussions with current licensees about DCD ambiguity (e.g. section 3H5 of the AP1000 DCD – shield building)



Post-COL Lessons Learned

Lesson 2: Regulatory Decision Making

- Revise IMC 0613, “Power Reactor Construction Inspection Reports” with enhanced guidance for URI closure.



Post-COL Lessons Learned

Lesson 3: ITAAC Closure

- Continued work with industry (NEI 08-01),
Revise Reg Guide 1.215, “Guidance for ITAAC
Closure Under 10 CFR Part 52”
- Continue ITAAC workshops
- For Small Modular Reactors: Update SRP
section 14.3 to include standardized ITAAC



Post-COL Lessons Learned

Lesson 4: Vendor Inspection/SONGS

- Modify the Vendor Inspection Plan (VIP) to formalize NRC-licensee communication processes
- Enhance MDEP information exchanges
- Modify VIP with additional inspection strategy guidance for major plant modifications



Post-COL Lessons Learned

Lesson 5: Changes during Construction

- Close out COL-ISG-025, “Changes during construction under 10 CFR Part 52” to NEI 96-07, “Guidelines for 10 CFR 50.59 Evaluations”