

Integrated FSAR for a COL Application

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Revised RG 1.206, Applications for Nuclear Power Plants
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Issue to Address

- As the process of combined license application (COLA) submittals has matured with the 1st round of R-COLA and S-COLAs, the 2nd round of S-COLAs are looking to take advantage of the foundation laid and not re-invent the wheel.

Issue to Address

- The DCD was incorporated into the FSAR (Part 2 of the COLA) by reference during the 1st round. After the COL was received an integrated FSAR was created. This integrated document is the UFSAR for the sites under construction now.
- S-COLAs developing Part 2 of the COLA would now start with the integrated FSAR.

What is an Integrated FSAR?

- Instead of incorporating by reference the DCD, the DCD text is integrated into the COL application (COLA) FSAR...one document (Part 2)
- An integrated FSAR in a COLA would be similar to Updated FSARs (UFSARs) of plants with COLs referencing the same DCD
- Part 2 would contain all the DCD text with all changes identified that result in the UFSAR

What is an Integrated FSAR?

- An integrated FSAR would likely contain hundreds of departures; some requiring prior NRC approval, but most would not.
- The COLA would also contain a Plant Specific Tier 1 document that would have all the changes identified to support the requested Amendments.

Advantages of an Integrated FSAR

- Supports the concept of standardization
- Eliminates the need to perform the COLA FSAR and DCD integration process post COL issuance – can take advantage of UFSARs of COL holders
- Takes advantage of “design center” approved departures and approved license amendments with staff safety evaluation reports
- Eliminates the need to process and incorporate hundreds of departures and submit many license amendment requests post COL issuance
- Presents the NRC staff a more complete “picture” of the plant that will be built since this integrated document would represent a more complete and accurate (and corrected) version of the licensing basis, reflecting the knowledge gained during the initial plant construction processes

Disadvantages of an Integrated FSAR

- Staff could review each departure individually and send many requests for additional information (RAI) to the COL applicant
- Resolution of RAIs may undermine standardization
- Staff may require extensive documentation in Part 7 of the COLA to justify each departure

Addressing Issue in RG 1.206 Changes

- How do we change RG 1.206 to clearly articulate the expectations for the COL applicant and NRC staff if an integrated FSAR is submitted with the COLA?
 - Clear guidance on FSAR format and content to delineate DCD text from site specific text
 - Clear guidance on level of detail in descriptions of departures in the COLA
 - Clear guidance on expectations for NRC staff regarding handling of departures that meet design certification rules for not requiring prior NRC approval

Addressing Issue in RG 1.206 Changes (Cont.)

- Clear guidance on FSAR format and content to delineate DCD text from site specific text
 - NEI provided comments on the draft C.1 Part 2 to address this point
 - Addressed issue of text identification

Addressing Issue in RG 1.206 Changes (Cont.)

- Clear guidance on level of detail in descriptions of departures
 - NEI provided comments on the draft C.1 Part 7 to address this point
 - Addressed need to review each design center approved departure for site-specific impacts
 - Utilized DC rule requirements (Part 52 Appendices, Section X) for scope of departure documentation

Review Section X of DC Rule Appendices

- 10 CFR 52, Appendix D, Section X requires the COL applicant to, in part:
 - Prepare and maintain written evaluations which provide the bases for the determinations required by Section VIII of this appendix. [It doesn't require these evaluations to be submitted.]
 - Submit a report to the NRC containing a brief description of any plant-specific departures from the DCD, including a summary of the evaluation of each. [A summary, not the full evaluation.]
 - On the date that an application for a license referencing the appendix is submitted, include the report [second item above] and any updates to the generic DCD.

Clear guidance on expectations for NRC staff regarding handling of departures

(that meet DC rules for not requiring prior NRC approval)

- Develop clear guidance for proposed RG 1.206 Section C.2.10, Change Process
- Reflect prior experiences with COL applications
- Expand on existing RG 1.206 guidance for departures not requiring prior NRC approval that states:

“the NRC staff will assess such departures but need not provide formal approval as part of its review of the COL application”

Clear guidance on expectations for NRC staff regarding handling of departures

(that meet DC rules for not requiring prior NRC approval)

- Staff should utilize the “audit” process to assess the applicants departure change process
- Staff should not perform a “technical” evaluation of each departure
- Staff can make a “reasonable-ness” determination that each departure does not require prior NRC approval
- Applicant's process for evaluating departures is also subject to NRC inspections

Discussion

