

# 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 1<sup>st</sup> round of R-COLA and S-COLAs, the 2<sup>nd</sup> 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 1<sup>st</sup> 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

