

Combined License Application Management of Design Changes Identified During Initial Construction & Testing

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Meeting Objectives

- Reach agreement on problem description and desired state that reflects NRC and industry considerations
- Identify viable and preferred options to address problem
- Identify potential barriers
- Identify follow-up actions

Problem

- Conduct of detailed design in support of lead construction projects has resulted in the identification of required design changes [e.g., exceeding DC/COL ISG-11 criteria] in the AP1000 design control document. In an April 15, 2015 letter to Duke Energy, the NRC stated that combined licenses (COLs) cannot be issued until significant errors in the referenced design certification (DC) are adequately addressed such that final safety findings can be made. The situation has significantly delayed issuance of pending COLs that reference the AP1000 design, and as detailed design and testing continues, identification of additional required design changes may result in further delays in COL issuance. This is a generic issue that could result in similar delays for any COL application that is based on a certified design for which detailed design and initial testing has not been completed.

Goal

- NRC review of COL applications that are based on a certified design can be completed and COLs issued without delays to address required changes in design certification information.
- The Part 52 change process and the provisions of the license provide adequate basis for the NRC to make the safety findings required for COL issuance.
- Required changes in design certification information are identified and resolved prior to construction of the affected systems, structures, and components.

Potential Approaches

1. Generic rulemaking, independent of COL issuance
2. Implement License Condition/License Restriction
3. Establish ITAAC
4. Develop PAR-like process
5. Issue a Generic Safety Issue (GSI) for each significant DCD required design change
6. Other

Industry Preferred Option

- Post-COL LARs and appropriate license condition/
restriction
 - Process consistent with NRC regulations and reflects that design issues can have no safety significance until fuel load
 - Assures constructed facility meets NRC requirements and promotes standardization
 - Facilitates required NRC safety findings on COL

Discussion

- Discussion of options
- Identification of best path forward
- Identification of next steps