MEETING SUMMARY
USNRC Public Meeting October 27, 2015
Regulatory Guide 1.206 Revision Project

On October 27, 2015, the Nuclear Regulatory Commission (NRC) staff conducted a Category 3 public meeting at NRC headquarters in Rockville, MD, regarding the staff's proposed revision to Regulatory Guide (RG) 1.206, "Applications for Nuclear Power Plants," which provides the format and content guidance for 10 CFR Part 52 applications. The purpose of this meeting was to provide a venue for stakeholders to provide input to the NRC staff in the development of guidance on select topics to be included in the revised RG 1.206.

The public announcement at http://meetings.nrc.gov/pmns/mtg?do=details&Code=20151494 includes links to the agenda, staff presentations, and draft guidance documents. All meeting materials are publicly available through the NRC's Agencywide Documents Access and Management System (ADAMS). An official transcript of the meeting, which includes identification of the participants, is attached and is an integral part of this meeting summary.

BACKGROUND

RG 1.206 was issued in 2007 as applicant guidance in anticipation of the submittal of new combined license applications under Part 52. The "New Reactor Licensing Process Lessons Learned Review: 10 CFR Part 52" (ADAMS Accession No. ML13059A239) identified the need to revise RG 1.206. The NRC staff initiated the revision in 2014 with the overall intent to institutionalize lessons learned from prior and ongoing Part 52 application reviews and to provide updated guidance to future applicants.

In September 2014, the NRC staff held a public meeting to present the proposed RG 1.206 revision initiative and to solicit stakeholder feedback. The October 27, 2015, meeting was the latest in a series of public meetings conducted by the NRC staff to engage stakeholders and acquire feedback in the revision of RG 1.206.

MEETING HIGHLIGHTS

The NRC staff presented an overview of the RG 1.206 revision initiative and an update of the draft guidance being developed for Sections C.1 and C.2. The NRC staff explained the venue for the meeting as a facilitated interactive discussion among the meeting participants and the staff for development of draft guidance for select Section C.2 topics. As identified in the agenda, the topics included: 1) C.2.8, Design Acceptance Criteria; 2) C.2.10, Applicability of Consensus Standards (a new topic proposed by industry); 3) C.2.11, COL Action Items & Post-license Commitments; 4) C.2.14, Information Change Processes for COL Applicants; and 5) C.2.15, Environmental Issue Finality for COL Applicants. The staff also presented the planned restructure of the RG 1.206 revision to relocate the technical information related to safety analysis reports from RG 1.206 to NUREG-0800.

The Section C.2 topics were presented by the staff and each topic engendered discussion among the NRC staff and meeting participants. The official transcript documents the details of the discussions.

ACTIONS

The NRC staff will continue the initiative to revise RG 1.206 and conduct additional public meetings to engage stakeholders in the revision process. The NRC staff will prepare guidance for the presented Section C.2 topics consistent with the discussion documented in the transcript.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
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DIVISION OF ADVANCED REACTORS AND RULEMAKING
OFFICE OF NEW REACTORS
REGULATORY GUIDE 1.206 (REVISION) PUBLIC MEETING
+ + + + +
TUESDAY
OCTOBER 27, 2015
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ROCKVILLE, MARYLAND
+ + + + +

NRC STAFF PRESENT:
TOM KEVERN, NRO
THERESA CLARK, NRO
JERRY CHUANG, NRC/NRO/DE/SEB
JOHN FROST, NSIR
DON HABIB, NRO
BARBARA HAYES, NRO
DEBRA MCCAIN, NRO
KIMYATA MORGAN-BUTLER, NRO
LYNN MROWCA, NRO
BRUCE MUSICO, NSIR
MARK NOTICH, NRO
ERIC OESTERLE, NRO
NGOLA OTTO, NRO
KATHLEEN PODOLAK, NRO
LISA SCHLEICHER, NRO
COURTNEY ST. PETERS, NRO

ALSO PRESENT:
KATI AUSTGEN, Nuclear Energy Institute
RUSSELL BELL, NEI
JANA BERGMAN, Curtiss-Wright Nuclear
GINA BORSH, Dominion
THOMAS HICKS, Southern Nuclear Licensing
KOREY HOSACK, Westinghouse Electric Company*
HOWARD MAHAN, Southern Nuclear Licensing
MARK NICHOL, Nuclear Energy Institute*
STEVEN POPE, NuScale Power
ROBIN RICKMAN, Terrestrial Energy*
STEVE SCHILTHELM, BWXT*
TOM WILLIAMSON, Enercon Services, Inc.

*Present via telephone

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P-R-O-C-E-E-D-I-N-G-S

MR. KEVERN: Okay, I believe it is 1 o'clock and I would like to get started.

Good afternoon, my name is Tom Kevern and we are getting ready for the most recent in a series of public meetings on the topic of Regulatory Guide 1.206 - the guidance for applications for nuclear power plants.

The updated presentation is in the back of the room if you folks are interested. Anyone would like a copy.

This is going to be a Category 3 public meeting. And what you see on the slide in front of you is the electronic link to the public meeting notice.

We updated the meeting notice yesterday for a rather small revision to the staff's presentation. So if you click on that link you will find the most recent version of the presentation dated yesterday.

And as we go through the discussion today, for folks who did some pre-reading on the first version, I'll flag the slides that have changed.

Purpose of the meeting is identified in this slide, is to acquire input from stakeholders for the specific topics we're going to be talking about today. For draft guidance for updating Regulatory Guide 1.206.

PARTICIPANT: Do you know who the court reporter is?

MR. KEVERN: Yes. In the public meeting notice you're going to find, besides staff's presentation, the documents listed by their ADAMS ML number.

The slide here that is going to be -- the draft guidance is going to be four different topics that are going to be discussed today. And the other individuals name on the meeting notice is Debra McCain, who is off to the right here with the court reporter.

And that brings up the point that this meeting is going to be transcribed. So that will require all of us to use microphones, speak clearly, distinctly. And if you think it's appropriate, spell your name when you're identifying yourself for the first time for the recorder.

Transcript will be made publically available. This is just like we did at the last meeting in June. And that will be a key part of the meeting summary.

So the purpose here is not to catch people unaware and document what they are saying or not saying in the meeting, but to be helpful to the staff in acquiring input so that we can document it, what kind of feedback we're getting.

We're going to have four draft documents today. We're going to have talks by the staff that's preparing those. And we're ready to move forward pending feedback from stakeholders.

So a couple of administrative items to talk about. You got here, and if you got here with the help of an escort, well then please wait until you get an escort to leave at the end of the day.

The restrooms are out in the lobby area. Through the lobby area. Men's room to the left, women's room to the right.

And in the event of an emergency evacuation we will all exit together. So please just wait with us and we'll go as a group.

And I think that is all of the administrative items that we need to cover, so we're ready to do introductions. I'd like to start with the NRC staff who will be presenting.

Again, my name is Tom Kevern. And to my right is Kim Morgan-Butler. And ask her to introduce herself and just identify a little bit about herself. And then we'll move on to the rest of the individuals.

MS. MORGAN-BUTLER: Yes. I'm Kim Morgan-Butler. I'm the Acting Branch Chief for the New Reactor Rulemaking and Guidance Branch.

MR. KEVERN: Theresa?

MS. CLARK: I'm Theresa Clark. I'm the Chief of the Mechanical Engineering Branch in the Office of New Reactors. And I'll be talking about the change processes and design acceptance criteria later on.

MR. HABIB: I'm Don Habib, H-A-B-I-B. And I'm a Project manager in NRO working primarily on AP1000 COLs.

MR. KEVERN: Mark?

MR. NOTICH: I am Mark Notich. I'm a Senior Project Manager within Kim's branch and NRGB. And I will be presenting environmental issue finality for COL Applicants.

MR. KEVERN: Courtney?

MS. ST. PETERS: I'm Courtney St. Peters. I am a Reliability and Risk Analysts in NRO. And I'm presenting on the applicability of consensus standards.

MR. KEVERN: Okay. And Kat?

MS. PODOLAK: Hi, I'm Kat. I'm the Secretary for the Division of Advance Reactors and Rulemaking.

MR. KEVERN: And the microphones, as I said, because of the court reporter.

MS. HAYES: Barbara Hayes. I'm a Project Manager with Kim's branch also. And I'm supporting Tom Kevern in this effort.

MS. SCHLEICHER: Lisa Schleicher. I'm a Geophysicist and Project Manager helping out with Reg Guide 1.206.

MR. FROST: John Frost with Nuclear Regulatory Commission. Also with NSIR. I'm working on the security portion of the Reg Guide 1.206.

MS. BERGMAN: Jana Bergman. Curtiss-Wright Nuclear. Member of the public.

MR. OTTO: Ngola Otto. I'm in the Electrical Engineer Branch in NRR. And I'm working on the Reg Guide 1.206. I reviewed the Chapter 8.

MR. KEVERN: Good. You've got a mic here. The green lights are on --

MR. BELL: Okay. I'm Russell Bell with NEI.

MR. WILLIAMSON: Tom Williamson. I'm with Enercon.

MS. BORSH: Gina Borsh, Dominion.

MS. AUSTGEN: Kati Austgen, Nuclear Energy Institute.

MR. HICKS: Tom Hicks with Southern Nuclear.

MR. MAHAN: Howard Mahan, Southern Nuclear.

MR. POPE: Steve Pope with NuScale Power.

MR. KEVERN: Debbie?

MS. MCCAIN: Debbie McCain. Online catchall.
MR. KEVERN: And our court reporter. Okay, one administrative item I didn't mention, that it's obvious, yes, when the green light is on your mic is on. And I'm told they're very sensitive. So just because your green light is off, if you want to have sidebar conversations or call me dirty names, probably not a good idea because the adjacent mics are going to pick it up.
All right, let's move on to the bridge line please. And we'll introduce folks. Please someone initiate, introduce yourself and your organization. Is there anyone on the bridge line?
MR. SCHILTHELM: This is Steve Schilthelm with BWXT.
MR. HOSACK: Korey Hosack, Westinghouse Electric Company.
MR. NICHOL: Mark Nichol, NEI.
MR. RICKMAN: Robin Rickman with Terrestrial Energy.
MR. KEVERN: Okay, if I counted correctly there are four individuals on the phone. Is that correct? And the court recorder, did you get those folks? Yes? Okay, thank you.
Okay, ready to move on. So thank you. Next slide is the agenda for today. This again is available on the public meeting notice and is obviously a slide in the presentation here for the staff today.
The subject for today's meeting are going to be the five guidance topics you see listed there. And the first four of those are topics for which the staff has prepared draft guidance. It's going to be one of the topics in Section C.2 that we'll talk about here in a few minutes. Those topics have not had the benefit of review by our Office of General Counsel. So the final document that comes out for guidance will incorporate OGC review as well as whatever comments and feedback we acquire from you stakeholders. So that will be the plan for that. And at some time, not specifically identified here in the future, sometime over the next several months, those documents will be out and they'll be issued for formal review and comment.
The last topic is a new topic that did not exist in the 2007 version of our Reg Guide 1.206. And that's a topic on consensus standards that was requested by Industry. So for that topic, a little bit different than the other four, we, the staff, put together a proposed approach for putting together guidance on that topic. The staff will be presenting that today.
And we expect to have a little bit more intense interactions with stakeholders to propose that. See if we're on the right mark or whether we're going in the right direction or whether you have some different ideas of what you like to see in the way of guidance. So that's going to be the last topic for today.
So starting with a brief overview, like I've done before. Regulatory Guide 1.206 was issued back in 2007 in parallel with a major revision of NUREG-0800. The Agency's standard review plan for reactor power plants. 1.206 is the only broad based regulatory guidance that

the Agency has for Part 52 applications. It addresses multiple application related regulatory issues.
And as of today it's rather significantly out of date. We documented that conclusion.
In the second bullet there you see on the slide today in the Office of New Reactors lessons learned report. And based on that report, and some initial staffing, we the staff started a revision effort in 2014. We had our first public meeting then.
Beginning interactions with stakeholders in September of '14. You see listed here on the slide.
And then we've had several meetings since then where we progressively talked about plans for our approach for revising the document, what the scope ought to be and so on. And would be in more detail.
Now as we've gone throughout this, for the last year and a half, a question that came up for discussion in terms for the staff, as well what we shared with stakeholders, was not only the approach we'd have to be taking for appropriate revision of 1.206 but also the scope of this guidance, the number of topics, the depth of topics, the level of detail of all this information.
In other words, in sort of lay speak, what should this animal look like? We started out back in 2007, it fit very much of a need.
At that point in time we had a renaissance, if you will, of applications that were anticipated. The standard review plan had not been updated for a number of years. That has changed.
We are now on a periodic or I'm sorry, we're reviewing and updating the standard review plan on a periodic basis. A rather structured package.
And the question to all is, what should we do with 1.206 as we go forward? Should it deal with only light water technology, should it deal with non-light water technology?
So we got a number of questions internally for the staff. We talked about it at the staff level, as well as with management.
And we even had an informal survey that was sent out to NEI a month or two ago asking, what do you folks think? So we've gone through that and we made a decision internally, as far as what that scope ought to be or not ought to be. And that's what Kim's going to address on the next couple slides here.
MS. MORGAN-BUTLER: Okay, so I'm not going to take too much time because we're going to need to get to the discussion with Theresa and Don. But just wanted to touch base with where we're at in terms of the scope and what's going to be the focus.
And of course this process has been an iterative process. Meaning we've looked at it in different ways and we've discussed it internally and tried to figure out the best scope as Tom mentioned.
And, you know, we're in an environment where we're looking at project aim 2020 and determining efficiencies in looking towards the future.
And so as we discuss where the scope and the forward path

that we're taking, I want everyone to keep in mind that we're still open to stakeholder feedback. And so -- but we really need it in order to justify, you know, a larger scope at this time.

So this, the slide that's up right now, shows the evolution of where we've considered -- of what we've considered for this update that started on September of 2014.

And so at one point there was discussion that the safety analysis report information would be a part of the appendices. So we would have, you know, a basic introduction discussion and guidance. In terms of application, format and content. And also discuss some regulatory topics.

From there we went to considering whether we should actually add the safety analysis report information into the document. And that was discussed during the public meeting.

And so we've, at that point, we had some internal discussions. And we talked to our general counsel as well as staff.

And we started to ask ourselves whether the scope was appropriate at this time. And what was the crosswalk between this document and NUREG-0800.

And so if we go to the next slide, during those conversations we decided that at this point barring, having the final conclusion from the survey and having also an opportunity for the public to provide us additional information, we're looking at a Reg Guide 1.206 revision that focuses mainly on administrative and procedural updates.

And so what we consider or what, you know, actually our general counsel considers technical information, we're going to limit that to the NUREG-0800.

We thought, well maybe we'll just have the Reg Guide point directly to NUREG-0800. It's actually much cleaner and it may be less confusing just to have 0800 focus on those topics.

And also do a consideration of what should be updated or added to 0800 that we were initially looking towards the Reg Guide to provide. And so that way we will still have the information on making the applications, streamlining the application.

Or not necessarily streamlining, but, you know, giving some guidance on what an application should look like in terms of format and content. And regulatory issues.

But we also understand that there's a requirement for the applicants to have an understanding of what's in NUREG-0800. And so this will be less duplicative.

You know, you won't have to go back and forth to make sure that everything is lining up. And it helps us because then it helps us from inadvertently adding information, which may conflict with one of the other documents. So we thought that this was an efficiency that we could pursue.

And so at this time we can talk about it a little now or we can wait until after the presentation that Theresa and Don is going to give, but in general, the Section

C.1 is going to remain the same. As we proposed in July where there is the application format and guidance. So you see C.1-C.1.1 through C.1.11.

And then the safety analysis report information is actually going to be removed. So the former C.2 will no longer be C.2.

But the former C.3, it gets confusing, the former C.3, which was more information related to regulatory topics, and some of the topics that we've had feedback that you would like to have more information on in the Reg Guide, such as design acceptance criteria, ITAACs, et cetera, we're going to include that in the area of C.2.

And so with that, I'll pass it back over to Tom. And before I do that, I just want to reiterate that any feedback that you can give us would be very important to this process.

And we're really trying to structure the Reg Guide so that it is very, you know, that it's information centered and is helpful. Because we have experience -- since we have more experience now than we did when we first drafted Reg Guide 1.206 in 2007.

And so we can identify now where the information, we can target the information a little bit better. And we can actually look into the future and understand that we need to make sure that everything is efficient.

MR. KEVERN: Okay, thank you for that. Okay, this slide identifies, it follows on to Kim's brief discussion.

And this slide identifies the current table of contents, as well as the status of all of those regulatory topics that we had in what used to be Section C.2 and now C.3 and then back to C.2 again. So I promise there will not be a quiz on our organizational structure.

This may look confusing. It looks like we were trying to make it overly complicated. There was a real logic to the way that we set this out.

We started out with appendices for reasons we don't want to talk about. And then we shifted gears and had a different way of doing business.

We moved that safety analysis report detail into the body of the guidance. And now that we're taking it out, why it seems kind of foolish to have a table of contents that says, this section deleted because of lack of interest or because we restructured or whatever else. So rather than doing something foolish like that, we're just doing the renumbering. So that's why you'll see the red line here for, the strike through, for references on the numbering scheme.

So as we go forward, barring another change because of feedback from stakeholders, like Kim just mentioned, you'll see Section C.1 and C.2 for guidance. And this is going to be the 18, and we currently have 18 topics. Now that's another item we talked about over the last year and a half, how many topics do we need. Currently we have 18. It's been that way for the last six months. And again, if we come up with a topic that either the staff or you folks think that should be added, or also

of course, open for consideration is where there's a topic that ought to be deleted because there's no value added, then we'll do that also.
Quick status here. The checkmarks, as noted at the bottom of the slide, a checkmark indicates a topic that was addressed in a previous meeting. We have five of those.
And then the arrows indicate the topics that will be addressed today. And they're also in bold.
The C.8 is design acceptance criteria. It's one of the five implements the staff has drafted. And it's a revision from the 2007 version of having that same topic being addressed in the original version of Reg Guide 1.206.
Likewise with C.11, COL action items. Likewise with 14, information change process. Likewise with 15, environmental issue finality.
And 10, the consensus standards, is the one that you folks had said yes to. And that's what I mentioned earlier that Courtney will give a presentation on our staffs approach and would like, we're hoping for, some meaningful interactive discussion on whether this makes sense or whether there's value added or whether that's a topic that perhaps we really don't want to have guidance on.
So that's the plan for today. Questions before we get started on presentations?
MS. BORSH: Two. Should we talk --
MR. KEVERN: Please have your -- yes.
MS. BORSH: Hi. Should we talk now about what you said, Kim, as far as your general plan for the structure or --
MR. KEVERN: Certainly.
MS. BORSH: Okay. Personally, I like the idea. I think, as far as putting all the guidance --
MR. KEVERN: Make sure you make that note mister --
(Laughter.)
MS. BORSH: Personally, did you get that. I like that idea. I think as far as having to use two documents to figure out what needs to go in there, I think that's wonderful. And there are a lot of advantages to that. One of the things though that we're finding in the SRP is that there isn't a lot of the detail in the SRPs that we've seen that some of Reg Guide 1.206 used to include. So do you all have any plans to work with the staff to integrate and look at the content of the SRPs to see what needs to be improved, either in the structure of them or the content?
MS. MORGAN-BUTLER: Yes. We're developing the plan now. Mark Notich is our project manager for that. And Mark can give a few more details.
But we are looking at -- there has been work that's been done by staff on the former C.2 section. The safety analysis report. And we're going to look at that work and figure out how we can integrate that into the SRP.
MS. BORSH: Okay.
MS. MORGAN-BUTLER: And so the information, we don't want to lose the information. We want to keep it for knowledge management and looking ahead to applications

that may come in. So we're looking for a way to make sure that we capture all of the current information.
MS. BORSH: Yes.
MS. MORGAN-BUTLER: The technical information.
MS. BORSH: And I'm not sure, the SRP you guys probably already thought this through, but I'm not sure that the SRPs are structured yet in a way that will allow for this. Because, you know, the staff is using it for guidance on how to accept the documents that are presented to them, right? The applicant's documents.
MS. MORGAN-BUTLER: Yes.
MS. BORSH: But there's some good detailed guidance in 1.206 that may or may not fit in with the current structure of the SRP. So I was just wondering if you thought that through or not.
MS. MORGAN-BUTLER: Mark, you want -- do you have anything to add?
MR. NOTICH: Not particularly. But we're in the process now of, you know, updating numerous SRPs. And we've talked about, how are we going to integrate 1.206 information in there.
We really haven't come to any sort of final agreement. And we recognize that that information should be somewhere.
MS. BORSH: Okay.
MR. NOTICH: And as you said, the format of the SRPs doesn't lend itself well to some of this information here. So there's a lot of discussion amongst the staff of well, what's the best way to do this? Is it to put it into an SRP? If you put it into a RIS?
So again, you know, and we're still trying to figure out what we're going to do. And we're waiting, you know, until we get through the 1.206 process to see, you know, well what information is going to be in here so then we have a good idea about, okay, how do we take that flavor information and put it into the SRPs which are, you know, are very structured and very technical.
So yes. It's something that the staff is aware or thinking about it, but I'm not going to come up with a good methodology yet. Okay? And any input that you have, we'll be more than happy to listen to.
MS. BORSH: Thanks.
MR. KEVERN: I'd like to add on to Mark's comment. This is sort of new news to everyone. So this is a recent staff management decision in coordination with our Office of General Counsel.
Like last week meeting, which is one of the reasons the slides have been updated. They were updated Friday. So the actual implementation is, we can use the -- should have been in quotation marks if we were to have this on the side, technical information as defined by Office of General Counsel. So it's a little bit in the eye of the beholder.
But that's the information that is being retained in the standard review plan and will be excluded from Reg Guide 1.206. So there's a little fuzziness on the edges of exactly what is or is not technical information. Which is also why I reiterated the 18 topics we've got here.

So if it's a question of how the applicant ought to prepare a package or what the expectation is for a level of detail or what a graph should look like or tables or how the packaging so to speak, that's all what we consider in the administrative procedural process type of information. And all that would be contained one way or at one place or another in Reg Guide 1.206.

But when you get into the actual technical detailed information, as far as what version of a consensus standard perhaps or what version of a software package or whatever or how many different tables or what level of detail of technical information overlaying the processes of whatever the topic is, that's what would be reserved for the standard review plan and not in Reg Guide 1.026.

So if we're able to jointly come up with bounding Reg Guide versus the SRP, we think it's going to work. But again, this is still relatively new news and so we're trying to work through the details. So the timing of the meeting is really excellent.

MS. BORSH: So are you saying that's a final decision that you all have made or is that still being negotiated?

MS. MORGAN-BUTLER: It's a final decision barring any -- barring no further information being given to us.

MS. BORSH: Oh, okay.

MR. HICKS: This topic, you know, we had, all the stuff in C.1 for example, in the Reg Guide, right? I mean that's all technical information that supports the acceptance criteria in the SRPs.

The SRPs say like, I was just looking just one, Chapter 8. You know, GDC-17. I mean it doesn't really tell you much beyond that in the SRP.

When you go in the Reg Guide it says, okay, the applicant will provide, you know, all the different analysis of offsite power system for this, that and the other thing. That you need to have in your FSAR, and that's what the staff relies on.

So it's not an open book then as far as what the staff wants to meet the acceptance criteria. You know, the Reg Guide puts maybe a box around it and says, this is what you have to provide. And so if you get rid of that, I mean that's got to go somewhere.

MS. MORGAN-BUTLER: Yes, it's going somewhere.

MR. HICKS: So that's what we're saying. We don't want to lose that or --

MR. NOTICH: Tom? You know, again, the SRPs, you know, are intended for staff use, you know. And the Reg Guide is out there for the applicant. You know, some of them are intended for the applicant.

So how do we blend that? You know, how do we, in an SRP, tell the applicant to do. So those are kind of things that we wrestle with a lot.

It's, you know, I don't want to say playing with words, but sort of what we're doing. Okay. You know, it's trying to tell you what to do without specifically telling you what to do, in that format. Okay.

So, you know, it isn't as easy as just taking it and plopping it in. You know, we have other aspects that

we have to plop too.
MS. BORSH: Well this is Gina Borsh again. And I think that's right, Mark.
I think that part of it too though is that by you putting, if you took some of the detailed information that, for example the information Tom was talking about, and you put it in the SRP, perhaps that would help get some guidance to your reviewers and improve the, not improve like you need it, but --
MR. KEVERN: It's okay.
MS. BORSH: -- increase the, thank you, between the viewers about what's being looked for.
Because that's been one of the struggles that we've had as the COL applicant. Is different reviewers look for different things. And if it was in your SRP, perhaps there would be more consistency between reviewers.
MS. CLARK: So this is Theresa Clark. And I can really only speak for my narrow technical area, which is mechanical engineering.
I think in our area it's a little bit different from the electrical reference that you gave where our SRP seems to have more and better content than Reg Guide 1.206. But there's some duplication and an inconsistency among the two that just makes everything confusing.
So for our review sections we just went through and put out draft updates to the SRP that we think covers everything we need to cover. And so I don't think we'll lose too much by getting rid of that piece of 1.206. Again, from my area.
But if I can restate what I think your concern is, Gina, I think the SRP doesn't necessarily do everything that one would hope about saying, here's the box for a DC, here's the box for COL. And, you know, and OL is a whole different situation. There's some pieces of that somewhere.
And some iteration of Reg Guide 1.206 was meant to draw those boxes. And I think we'll have to consider whether we've captured that thought somewhere. Is that kind of what you were getting at?
MS. BORSH: Well it is, yes. That's certainly part of it, Theresa. I agree with that.
The other piece though is that what we found, because Dominion switched technologies a couple times, we found that different reviewers are looking for different things to meet specific acceptance criteria that are specified in the SRPs. You know, for our COL application that's referencing a DC and an ESP.
So to us we thought, well how could this be, you know? This was acceptable for the Chapter 12 reviewer for X Technology and it's not acceptable for Y.
MS. CLARK: Yes. And we understand that and we are dealing with that in a number of ways. Some of which are the SRP updates that Mark mentioned. But some of that is just training of staff --
MS. BORSH: Sure.
MS. CLARK: -- and consistency of knowledge management and all of that. And a Reg Guide is not necessarily going to solve that piece of the problem. But we got

you.
MS. MORGAN-BUTLER: And those are the efficiencies we were thinking of. Because for staff, the applications all look different.
MS. BORSH: Right.
MS. MORGAN-BUTLER: You know, there is no, you know, we hope that this update of 1.206 will get us applications in that look similar. You know, at least guide the application process so the applications look similar. And then that makes it easier for reviewers to talk amongst themselves and to compare notes. You know, because it's very difficult if they all come in in different formats and there's different reads on them. It may be taken -- it may be the context in which the information was presented.
MS. BORSH: Yes.
MS. MORGAN-BUTLER: And so those are the efficiencies we hope to gain by giving -- that type of efficiency we hope to gain by giving instructions on the content and the format.
MS. BORSH: Another big efficiency that I think, and we talked about this a little bit through NEI, is that by putting that content into the SRPs, it's so much easier, as you were referring to Theresa, to keep individual SRPs up to date then it is to make a Reg Guide 1.206 revision. I would think. And from the history that we have here, that's what it looks like.
You know, the SRPs are updated periodically. They have been since 2007. And here we are just talking about our first revision to 1.206.
So there are inconsistencies between 1.206 and the SRPs. And being able to do it on a piecemeal basis I think would be much more efficient for you all, and then for us too, to keep up with.
MS. MORGAN-BUTLER: And we also had discussions on including RAIs in, you know guidance, somewhere in this Reg Guide. You know, just in general.
But we have to think about what that would look like and what type of information is there. Because we have, internally, we've been discussing that.
MR. HICKS: That's not one of your topics though, is it?
MS. BORSH: It is.
MR. HICKS: It is or isn't? It is.
MS. BORSH: Yes.
MS. MORGAN-BUTLER: No, that's it. But we don't have any, we discussed it before, but we added that request for --
MR. KEVERN: To --
MS. MORGAN-BUTLER: Yes, we added request for additional information just recently. So we discussed it, but I think we have to go back to it.
MR. KEVERN: We talked about it in the last meeting. But it was one of those topics where we had a, somebody here recalled, it was a recently made publicly available office instruction. And so we had an office instruction. And there's a lot of detail.
But one of the takeaways we had from stakeholders was, well that's nice, but it really is more guidance to

staff. And the instruction really doesn't answer the question that you folks have is, how can I put together an application that will not have any RAIs.
Well that's not the intended purpose. So we're back to the drawing board trying to figure out what we can say in that regard, other than the vague guidance we've had in the past that was, give us complete level of detail, et cetera, et cetera, you know. So that doesn't quite cut it.
So it's -- we tabled that temporarily until we can figure out a better approach. So that's on our to-do list, but it's not part of today's meeting. So it's a --
It was talked about, but we did not have an answer. We did not have draft guidance documents setup yet.
MS. MORGAN-BUTLER: Yes. But we are considering it.
MR. KEVERN: Yes.
MS. MORGAN-BUTLER: Yes.
MR. KEVERN: In fact, I might move on to the presentation and then come back to this.
MR. SCHILTHELM: Do you have time for one quick comment from the phone?
MR. KEVERN: Yes.
MR. SCHILTHELM: Just very quickly.
MR. KEVERN: Identify yourself please?
MR. SCHILTHELM: Yes, this is Steve Schilthelm with BWXT. The idea of efficiency moving toward the SRP guidance is a good one from our perspective at BWXT. You might learn some lessons if you go look at the fuel side of the agency where they got NUREG-1520 for the fuel plants. And there's a sister SRP for the MOX plants where they're doing this very thing. They don't have a standard format and content guide.
And I think NUREG-1537 for the research reactors is kind of a two-part SRP and guidance documents. So you might have some learning there if you go talk to them about lessons learned.
MR. KEVERN: Thank you. Yes, we've looked at that as part of the process too. And there is a potential for parallel there.
But also we have found is the bulk of information for reactors. Both the old version of 1.206 and the current standard review plan.
The total amount of information, the bulk of pages, it's significant. It's like an order of magnitude greater. So, you know --
MR. SHEPARD: Yes.
MR. KEVERN: -- got a volume of information detail also to address. So I'd like to just briefly summarize what I think we've got today.
I believe the staff is aware of all the challenges and questions we're talking about in the last 15 minutes or so. I don't have answers for all of those.
But what we do say is, and this is what the staff has been wrestling with for a while, is that it is not two different documents. And so we struggle with a lot of problems.
And we concluded that having a standard review plan and a Reg Guide 1.206, continuing the differentiation or

demarcation, if you will, we started with back in 2007, is not the solution as we go forward. So it's -- we can address all these ways.

Having two parallel documents we're trying to maintain consistently. And in some cases duplicative and lack any inconsistencies and contradictions, that isn't going to happen. And so having two documents, it solves some problems, but it certainly creates, in many cases, depending on, it's in the eye of the beholder, it creates more problems than it solves.

So that was something we wrestled with. We had a decision and barring, I said a mutiny from industry, why that's the direction we'll end up going. Yet we're going to try to address all these, the solutions, all the challenges we've been talking about here.

But in light of having the informative Reg Guide 1.206, the way you see it listed here, and the separate standard review plan for technical information.

But if there are any helpful hints you can give us to answer some of the challenges that we've talked about, we would very much appreciate that. And whether it be adding another topic here or differentiating or clarifying something, we'll do our best.

Okay? So let's move onto the specific technical topics and hopefully the draft guidance will clarify these topics today.

The first is design acceptance criteria. And Theresa Clark will address the topic.

MS. CLARK: All right, thanks, Tom. So again, this is Theresa Clark. I'll be talking about design acceptance criteria and then after an interlude from Don I'll be talking about change processes as well.

Tom was nice enough to let me sort of insert myself into this process. Because there were topics that I thought could use some clarification. So I've attempted to do that and welcome your comments to make them even better.

But both of these sections that I'll be talking about, they did exist in the previous version. They weren't necessarily the most clear cut sections that I've ever read, so I attempted to clarify a little bit of that.

For design acceptance criteria, sort of from the personal side, I got into this because my branch is the one that's responsible for addressing piping design acceptance criteria.

However, the term design acceptance criteria, as used by the NRC for the last 20 years or so, relates to several technical areas. There's instrumentation and controls, there's human factors. Occasionally there's radiation protection and there's piping.

And so this is a brief and broad discussion of piping design acceptance criteria. It's not meant to include the technical details of what we've be looking for.

For example, in the area of piping. And that's why it will point to the SRP. I think right now it points to an appendix section, but that's going to point to the SRP eventually, once this gets updated. Because that really says what we're looking for in terms of methodologies and such.

So design acceptance criteria, for those of you who've been around for a while, you know what the point is. Basically there were certain areas, when you go to certify a design, that at the time we were developing the Part 52 processes in the early '90's didn't make sense to have everything in there.

And the two sort of areas that the Commission said was, or that the staff said that they plan to use design acceptance criteria, were where things were changing really fast. So locking it down didn't make a lot of sense. So digital instrumentation and controls was one of those.

Or where things really needed as-built, as-procured information to make a fruitful analysis at the time of application. And piping was an example of those.

And so what the staff told the commission at the time, and so I guess we'll switch the slide to nine. Sorry. Just give a little bit of history. What the staff told the Commission at the time was that instead of looking at every detail of this in a way that you might look at a service water system in detail, we would focus on methodology, we'd focus on having ITAAC and that sort of thing.

So that we would look at a whole design package from an approach perspective. And we could make a safety finding based on that, with the details to come later. And that's how we've implemented a number of standard designs so far. And that's how this guidance still says you can do it. And so I do want to be clear.

And now we can go to the next slide. In this document we're not changing the staff's position on where design acceptance criteria could be used. We're giving a little bit of information about some areas where you could choose not to use it.

But if you're going to use design acceptance criteria, we put in some statements that, again, are consistent with the early '90's origins that we should be justifying why and how we're using DAC. It's not a given that design acceptance criteria are right for every situation. And so the staff will be looking to say, for this situation it makes sense.

That being said, our staff has found, and we're going to be giving a little bit detail about this, we hope, at a RIC session at the Regulatory Information Conference in March.

In some cases we haven't need to use DAC. Things have evolved or we've re-looked at our processes. I can't speak to the details of instrumentation and controls myself, we'll get somebody to do that later on.

Sometimes they have found out that they don't need to call something DAC. They've looked at enough that they can just have ITAAC and it doesn't need to be called DAC. And all the complication that could go along with that. And, you know, especially in areas where the concepts aren't evolving quite as quickly as they were in the time of the '90's. So maybe it's not as necessary.

In other cases we have the benefit of construction that's already happened. Sometimes overseas. Or if

simplified designs or that sort of thing.
But when you look back at the justification for why we had DAC in the past, it may not be as appropriate. But again, I want to be clear that we're not saying you can't use DAC. At least not in this document.
But if there's a way to use it to have a more complete package that doesn't have them, great. And I think that's something where you'll work with the staff on that.
So what you see in the document is, if you are submitting an application that tries to use design acceptance criteria, we would like you to engage early with us to describe what you're planning there.
And in the application, you should include a design specific justification for why you're using DAC. Is it that change in technology, is it the fact that you need as-built information.
And then it would be helpful for the staff to have a roadmap to say, remember, DAC is not just an ITAAC, DAC is a whole package of information. Including the methodology, for example, of piping analysis methodology in Section 3.12.
Where you can find all of that stuff and how some of it is controlled. Some of it probably needs to be Tier 1 information that's going to be controlled that way through the life of the plant.
And again, there's a reference here to say we're not giving you technical information in this. It's just sort of a high level discussion.
If you go to slide 10, okay. Yes, that was design certification. So design certification applications are the one that really lays out the framework for having DAC.
Slide 11 has similar words on it. But it's basically saying, if you're a COL applicant and a design was just certified, it's highly unlikely that you're going to have additional information, such that you can get rid of DAC in your application and that's fine. You can incorporate that by reference.
If something has evolved such that you've got, you know, six combined licenses that happened before you and everybody has been constructed and things are already been finalized, then you could roll that right into your combined license application and not have DAC as part of that umbrella. So that's basically all that says.
So it's pretty brief. Hopefully it's relatively straightforward. And again, we're not rocking the boat or changing positions, but we're trying to give a little bit more guidance about how you can do it. Incorporate some of the insights that we've had over the past 20 years or so.
MR. KEVERN: Okay.
MS. CLARK: Thoughts on any of that?
MR. KEVERN: Thanks, Theresa. And I forgot to mention earlier, this is one of the documents that was made available on the public website.
And we also have it available here that Kat can call it up if you have a specific question you want to talk about

down to that level of detail of some of the verbiage that Theresa was just talking about.
So with that lead in, I'd like to open it for discussion. Comments, questions please?
MS. AUSTGEN: This is Kati Austgen from NEI. Thank you for that, Theresa. I think that does explain a little bit better what we were reading in this draft section and I still had some questions.
In particular, now you want the justification and you want it to be design specific. We note that some of the areas where DAC has been used previously you would not necessarily have a design specific justification for that.
To use your example of piping. Piping for any design would have the same basic reasoning why you might still want to have DAC.
So we'd want to understand a little bit more, what exactly you're looking for with justification there. And maybe some clarification of the conditions under which the staff would accept DAC or the basis for why you would reject proposed DAC.
MS. CLARK: Sure. So I'll look at the document later on to see how I incorporate these thoughts, but my initial reaction is, it actually, take piping because that's what I'm most familiar with, it could be a design specific situation.
So for example, a large light water reactor with lots of active systems might have the sorts of pumps and valves and big pipes that are not well suited to making piping design calculations, before you know whether the pump has the intake on this side and the discharge on this side and where the weight hangs off of a valve and all of that stuff. It can be very challenging to do that before piping is finally routed in a plant, for example. And so that might be a situation that lends itself to DAC. And where people have used DAC in the past successfully.
In that case however, we'd still like to see something to say: "I, applicant, for my design, feel like we meet this situation. My design is within this envelope." It doesn't have to be a lengthy justification.
But if you go back to the papers in the early '90's, there was discussion of having some justification. So it's a greater than zero situation.
I will say that there are designs for which the staff would find it somewhat more challenging to say that applicants don't have the design information necessary at the application stage to do their piping analysis. If there's not a lot that's going to change between now and when you build the plant, that argument is a little less solid.
And then it becomes a discussion which we'll have -- we can have separately, and I've had with multiple vendors, about, you know, what information do we need now, sort of to help the staff understand that you know how to do the piping analysis and what information could be put later in the as-built stage. So there are ways to do that.

But, you know, if we're seeing some sort of super innovative design with a different piping approach then we've ever seen before, that's something where it would be harder for us to make the case to ourselves that we can just say right now, based on methodology, that everything is going to be okay. We might need a little bit more.
And so that's where the design thought process comes in. Does that help?
MS. AUSTGEN: I think so.
MS. BORSH: Could you give us an example? Because I got lost.
MS. CLARK: Sure.
MS. BORSH: I mean I understand what you were saying, Theresa, but do you have an example of a case where you think you know -- we know more now and wouldn't say DAC are appropriate?
MS. CLARK: All right. So inappropriate is a strong word. But there is an application that we're currently reviewing on the docket that does not have DAC and is not planning to have DAC.
Because we're implementing a graded approach to saying, we'll review these piping analyses now to demonstrate that we understand how the methodology is done. And the final piping analyses will be done at the as-built and they'll be verified through ITAAC as well as ASME stamping and a variety of other ways.
And there's no need for an interim step that we call DAC. In that case, if everything works out with that application which is under review.
MS. BORSH: Okay.
MS. CLARK: So I can't say that it will work out, but that's the approach that's being taken by that applicant.
MS. BORSH: I see.
MS. CLARK: And so --
MR. HICKS: Is that in your standard review plan now?
MS. CLARK: No.
MR. HICKS: What you're talking about?
MS. CLARK: No.
MR. HICKS: Okay.
MS. CLARK: So this, and again, this is just for piping. I'm not speaking to the other disciplines, but this is something we've been talking with certain vendors on a case-by-case basis to say, is this something that we can work out.
You know, DAC are legal, but there may be ways that we can come to an approach that doesn't have this term, DAC, which can be confusing sometimes and can place some risk on the end stage construction and licensing processes. It could be easier to have it all in a design package that we certify up-front. And so that's --
We issued a White Paper about a year and a half ago. Kind of to float some ideas that OGC had approved. And we've been having those discussions case-by-case.
But because it's been that case-by-case sort of low level discussion, it's not reflected in here. We're not taking a policy that says, DAC are bad and we can't

do DAC. We're saying, let's talk. Basically.
But that's not what this document is trying to say. This document is just saying, think about whether you really, really need DAC, if so justify it. If not, hey, come talk to us and we can try to work out an approach that lets us make the safety findings that need to be made.
Did that help? I don't like naming names.
MS. BORSH: Yes. I do have to say though, that when I read it, and this was just my take on it, it did seem that there was a reluctance or it felt like applicants are being pushed back, you know. Do not come in with DAC unless you absolutely have to.
It didn't seem as neutral as you're presenting it here. It's just something to note.
MS. CLARK: Right. I think that that reluctance is the way some people feel. But it's -- we're not going to change our position without informing Commissioners and that sort of thing.
MS. BORSH: Right.
MR. HICKS: Right. Because we had just -- and we were talking about the '92 SECY paper on this and basically, pretty much as a given, it says that piping analysis will not be done at design certification stage. Pretty much is what is says.
And that, you know, and then it goes forward and sort of describes, okay now what do you do for DAC.
MS. CLARK: Sure.
MR. HICKS: So now it seems like we're sort of backtracking from that and saying, well, it's not a given anymore, now you got to provide all this justification in order to have piping DAC.
MS. CLARK: Right. And I, I'll have to go back and take a look, but I think there was some discussion in those papers of having a justification of tying it to what those things were.
And, you know, we've learned a lot of the last 20, 25 years about how these processes work and what some of the challenges are of having these interim stage steps. And so if there is a way to do it better, we'd like to do that. But we'll take a look at the tone.
MR. NICHOL: Theresa, this is Mark Nichol, NEI, on the phone. Am I allowed to make a comment at this point?
MS. CLARK: Sure.
MR. NICHOL: Okay. So ideal, with all the industry comments I've heard so far, I'm also wondering. I still don't understand the problem that the NRC is trying to solve with this.
What appears to me, anyway, is somewhat a new position on the use of DAC. And also I'm not really sure what the benefits are to it. I understand the NRCs desire to have more information at the time of design certification.
I think a lot of what you've been discussing is really focusing on the technical side of the question in terms of whether these analyses could be performed at its time of design certification.
But I think another element of the discussion is the

ability or the cost for the applicants to develop these analyses and all of the resources needed to do the engineering.

And I know that it's already expensive to develop and submit a design certification. The extra engineering and analysis could be a limiting factor and almost discourage newer and more advanced designs from being submitted to the NRC.

So I just urge you to, one, think about the problem that's being solved and what the benefits are. And maybe better clarify them when you're presenting this. And then, two, do think about the cost impacts that the NRC's position would have on the applicants.

MS. CLARK: Sure, Mark. Thanks. That's a good comment.

And so when we look at the final here, we're not trying to go too far on a limb in this, so we'll have to take a look at that. But what we did want to enhance was the idea that there needs to be some justification if you're going to use DAC.

And I think the staff had somewhat gotten away from what we had originally told the Commission we would do in that area. So I think we'll do that.

Specific to the discussion that, you know, I have had a lot of time, but I wasn't really planning to have on this topic, about whether you don't have DAC. That is really a design specific thing.

We understand the comment about cost and we're not looking for unnecessary analyses, unnecessary regulatory burden, here things fit very neatly in the box of why we were having DAC in the first place: of not spending a lot of time on useless analysis if we knew they were going to change at the as-built phase. If that was something that's of concern, I think those arguments are still just as valid as they were 20 years ago.

But when applicants have the benefit of already knowing what they need to know, if they've already done the analysis, we'll put it in the package and we can certify it all together.

What the staff needs to focus on is the safety position. So if we need to see some analysis to make a safety finding, we're going to need to see that analysis. And so we just - that's sort of a case-by-case decision. I hope that helps. But we will take a look at it.

MR. BELL: Just one more thing. It's Russell Bell. You know, I think the benefits of not having DAC are understood by everybody. And I think there's creative thinking going on.

Theresa, you mentioned in the piping area to try and not have DAC. I know that's occurring in I&C, HFE.

What the staff is after is kind of happening naturally. And so you're getting a sense, from the comments that, you know, the tone here is different. It appears to be a barrier to that which has been approved and acceptable to date.

And, you know, there may not be a need for that. What you're after is happening naturally.

You know, the bit about the additional justification, you know, may not be necessary. If you get an applicant to come in pre-application space, you will obviously talk about these four areas and how you're going to deal with them.
The preference to not have DAC will be shared. It may not be achievable, but it will be shared. We'll work through that.
And in some cases you may find that there's an answer. And you could be grateful for it.
But this appears to be, you know, pushing back on that which has been approved and acceptable to date. And that's not necessary to do so.
I appreciate you taking the notes and taking on board, you know, the comments. And we may, you know, we may follow up as we've done before in terms of what we discuss here when we follow up.
MS. CLARK: Okay.
MR. BELL: But I hope that helps.
MS. CLARK: Yes. So we have had lots of fruitful discussions with various vendors on this. And so we definitely don't want to derail any of that with this mild little document. So.
MR. HICKS: With the discussion of the COL applicants in here?
MS. CLARK: Yes.
MR. HICKS: Currently, the way the guidance is, it's sort of an option. The COL applicant, ten years from now a new COL applicant comes in and wants to resolve DAC during the applicant stage, it can do that if it chooses to do that.
The way I read what you've written here, it's almost now you say they should do this. Almost they need to do it.
MS. CLARK: Yes.
MR. HICKS: Is that your intent? Because --
MS. CLARK: I'll have to think about that. Because the way you just restated it to me is probably stronger than I meant. I think a lot of times people might make that choice for convenience, but we don't need to necessary push it on them.
MR. HICKS: Okay. And the other point here too is that, you have statements in here about then you'll review that information and if approved, the staff would indicate completion of the ITAAC in the FR notice.
You know, if you look at that closure for subsequent COL applicants, they have to reference either an NRC acceptance of a previous licensees DAC closure document or possibly a vendor submitted topical report.
MS. CLARK: Yes.
MR. HICKS: That closes it. So that approval has already been made, right?
MS. CLARK: Right.
MR. HICKS: So all they're doing is referencing a previously approved submittal.
MS. CLARK: Right.
MR. HICKS: So there really shouldn't be anything for the NRC to review and approve for that subsequent COL, right?

MS. CLARK: Yes. So I think it's more, in that case that you described, it's more of a verification process. There is a process step about putting it in the federal register because it's an ITAAC closure sort of thing that we would have to do anyway. But yes, I wasn't intending anything too significant there. If it's something that is identical to what the NRC has already reviewed, I would think.
MR. HICKS: Okay.
MS. CLARK: I'll think about that.
MR. HICKS: Yes.
MS. CLARK: Good point.
MR. HICKS: In our discussion, if you look in the ESBWR DCD in Chapter 14, Appendix 3A, Tom probably remembers this, but they wrote up a whole DAC closure section.
MS. CLARK: Yes.
MR. HICKS: And that kind of went through some of the things maybe they could capture.
MS. CLARK: Right.
MR. KEVERN: Are there comments or questions on the phone? All right.
MS. AUSTGEN: I had one more --
MR. KEVERN: Okay.
MS. AUSTGEN: Did you mention that recently an SRP section on piping had already come out for review?
MS. CLARK: No. That was actually -- that was updated. I think early in 2014 it went final and the update was not all that significant.
MS. AUSTGEN: Okay.
MS. CLARK: All the rest of my branch's SRPs just went out for comment.
MS. AUSTGEN: Okay. So we would still be looking to the future as we contemplate moving away from an appendix to just putting that format and content information in the SRP?
We would be looking for these details on expectations for the use of DAC in the SRP section?
MS. CLARK: It's there. So the, I think I mentioned before, for my branch's review areas, and I don't want to put myself on a limb by saying all, but the content in the SRP is sort of the controlling content. And if you look at the Reg Guide, it's shortened or it has a couple of interesting things tossed in. But I'm not sure were really necessary.
And so for our reviewer, I don't think we lose anything. Everything is already in the SRP.
I will say that the piping section in the SRP, in 3.12, is very methodology focused. And it doesn't say a lot about what an applicant would provide in terms of results if they were providing results.
But that's something we've kind of been able to work out on the side to date. So we'll look at that in the future.
MS. AUSTGEN: Okay. So some of the areas, other areas, where DAC would still be possible, we would be watching for future revisions to those SRP sections to clarify what the DAC expectations, if someone choose to use DAC?
MS. CLARK: Certainly possible.

MS. AUSTGEN: Okay.
MS. CLARK: And I will restate that in all areas where DAC were formerly possible, DAC are still possible.
MS. AUSTGEN: Okay.
MS. CLARK: There is no official change there.
MS. AUSTGEN: Thank you.
MR. KEVERN: Thank you for all the discussions.
MS. CLARK: Thanks guys.
MR. KEVERN: This is exactly the reason I wanted to add a court reporter, so we could capture all this.
But now in addition to that, Kati, I'd like to make a request that if NEI would be, not only this topic, but the other four we're going to be talking about today also, if you would like to document any of this to supplement what were -- the staff is going to find out, from the court reporter we would appreciate it.
Especially the discussion we had on tone. Not to pick on you, Russ, but that was -- you were one of the folks talking about the, I think I would characterize it as a tone of the way this guidance is written. So, you know, that tone is one of those subjects. It's sort of like in the eye of the beholder.
So if you could clarify what you mean from it by telling --
MS. CLARK: I got that one. I don't think I need that in writing. Although if you wish to write me a letter about my tone, I'd --
(Laughter.)
MR. KEVERN: So whatever you'd like to document we would be happy to undertake. Thank you.
Okay, so moving right along. The next topic on discussion today is COL action items. This is the renumbered C.2.11.
And this is one of the sections that was revised in the updated version of the presentation that was sent out Friday. It's the same topic, but just the slides have changed.
So the content of the previous slides is approximately the same, but you'll see a couple additional slides and changes on some of the bullets. And so for this topic Don Habib is going to speak.
MR. HABIB: Thank you. Thanks, Tom. Again, my name is Don Habib and I'm a project manager in the Office of New Reactors.
So this presentation covers two related topics. The COL action items and post-licensing commitments. And the proposed guidance is in ADAMS, publically available, ML15247A190.
There are already two existing pieces of guidance out there. The first is the earlier Reg Guide 1.206 from 2007. And that's entitled, Combined License Action and Information Items.
And then more recently the ISG-15. Was issued in 2010. And that's entitled, Post Combined Licensed Commitments.
So the first point I want to make is how the current Reg Guide or the proposed Reg Guide language compares to the ISG. And in general there's really no substantive

change from the ISG, in terms of either the organization or the content.

A lot of the content has just been simply copied over into the Reg Guide. The primary difference being the language is refined somewhat to try to more clearly communicate the points we're trying to make.

Next slide please. This is just an outline. Again, starts with an overview. This was rewritten.

And under the guidance section, two section COL action items. And the COL action items that cannot be resolved before issuance of a license. That's your post-license commitment.

And then the three types of post-licensing commitments. There's sections on each of those. The ITAAC license conditions and FSAR commitments. And then the two types of FSAR commitments.

Next slide. Within the overview, one of the items covered is, again, distinguishing the terminology. COL action item versus COL information item. Generally just clarifying the relationship that they refer to the same thing.

The staffs been using COL action item. Applicants have tended to use COL information item. But other than this, the guidance really doesn't identify any difference between the two.

Also calls out the key regulation that calls out COL action items. In Part 52 each of the DCD appendices includes a Section 4. And in that Section 4 it basically states the COL action or COL applicant, when they reference that certified design, needs to address COL action items in the application.

And this is basically defining what a COL action items is. You know, it's something that the COL applicant has to either do or include in their application. If they're going to reference that certified design.

You'll also recognize that early site permits can have COL action items. And they'll be treated in the same way.

So it's something that a COL applicant, if they are referencing or incorporating by reference, an ESP, that they need to address in their application.

And then finally the overview talks about actually resolving COL action items. And for this there are multiple scenarios.

The first and obvious scenario is that it's resolved as part of the application. There's information in the application that resolves it.

The second scenario is that it becomes a post-licensing commitment of some sort. And then the third is a hybrid of the two, where part of the information is included in the application. But there's also a post-licensing commitment.

So for any DCD or any ESP that has multiple action items, you'll get some that can be resolved pre-licensing or through the licensing process, and some post-licensing. And then some partly either pre-licensing or post-licensing.

Next slide please. So again, first thing in the

guidance section that's talked about is an applicant has to address all of the COL action items in the application. Not necessarily resolve them all, as I said, but at least address them.

So that means they need to look at the source document. Either the DCD or the ESP that it's referencing. Identify all the COL items in those documents.

And that the application should include, in Chapter 1, a table listing all those items. And then information about how it's being resolved. Either as part of the application, post-licensing or a combination of both.

And then the next section, COL action items that cannot be resolved before issuance of a license. The language in this section pretty much comes straight from the ISG. And talks about, basically the applicant should or the application should include whatever the requested information is. Or if it's going to be a post-licensing commitment or a partial post-licensing commitment, a justification about why the item cannot be completed prior to issuance.

And it gives the example of a COL action item that requires a plant walk down and, you know, the plant isn't built so that can't be completed at the time of licensing. So the things dealing with as-built specifications are generally going to be accomplished after licensing. And those result in the post-licensing commitments.

When they're making the commitment, again, the applicant has to be clear about what they're going to do, what the commitment is and then what type of commitment is being made. And this gets into the various types. Either the ITAAC, the license condition or the FSAR commitment.

There's also a fourth option that's identified in the guidance. And it's basically, well it's the first option listed I think.

And that there's basically nothing to do. And this would occur in a case where the commitment, the post-licensing commitment, is already addressed through an existing ITAAC. For example, in the DCD.

And then which option is appropriate for given COL action item, in terms of a post-licensing commitment. It's going to depend on the specific circumstances. And then I'll cover those in the next -- those are covered in the following sections.

The first one of those is the ITAAC option. And in the guidance lists three relevant regulations in Part 52, 52.80(a), 52.99, 52.103.

The first one, 52.80(a), gets into contents of the application. And it's the one that identifies the ITAAC that's to be included in the application.

52.99, that deals entirely with ITAAC. Paragraph © deals with the notification. When a licensee completes an ITAAC they have to provide a notification to NRC.

And then 52.103(g), that's basically important because it distinguishes ITAAC from the other post-licensing commitments. And that's basically that it needs to be completed before fuel load.

Guidance also makes a point that ITAAC are generally just a specific type of license condition. You know, in the ITAAC, and the guidance doesn't go into this, there's other guidance dealing with ITAAC.

But just the three parts of the ITAAC. The design commitment, the inspection test analyses and the acceptance criteria.

With the, you know, inspection test analysis is what the applicants committing to do. And the acceptance criteria are basically being the result that if it's met, satisfies the design commitment.

And then the rest of the bullets on this slide address some of the points that are covered in the guidance.

The purpose of the ITAAC, generally to ensure that the plant, as-built, meets the requirements of the regulations.

Second, that the ITAAC, again, it has to be completed before fuel load. And this is one of the key factors or characteristics that distinguishes ITAAC from the other types of commitments.

The action item has an automatic notification requirement. So they don't have to have a notification requirement written into them.

And then basically, I guess what the commission's obligation there is to make a finding prior to fuel load.

All the ITAAC have been completed.

Next slide, license conditions. And again, this section of the guidance, the language comes -- all the language that's in there comes from ISG-15.

Again, one of the key things that makes license conditions distinct from ITAAC, they can be completed after fuel load. The guidance gives an example of startup testing.

Another point of the guidance is that they're not -- they shouldn't be redundant. In other words, if they are -- they shouldn't be covering something that's already in the regulations or already, say, somewhere else in the licensing basis. Like in technical specifications.

So if those, whatever the obligation is, if it is covered elsewhere, it doesn't need to be covered in a license condition.

And the guidance lists several factors to be considered by applicants. When they're proposing license conditions, first, that they stay as part of the license until they're both completed and removed from the license. And the licensee has to go through a license amendment request process to remove the condition from the license.

And the license condition, because it's part of the license, again, it's enforceable. Just like a regulation or an order.

Again, the license conditions, they're distinct from ITAAC. They don't have a built in notification requirement or submission requirement. So if there is something to be submitted to NRC, that would need to be stated and included in the license condition.

So because it can be used after fuel load, this would

be a way to impose restrictions on a facility while it's operating. And so it makes it appropriate for tests or other types of operational constraints.

And then the final point the guidance makes, is that license conditions are appropriate for implementation schedules on operational programs. And this would be one where the schedule is not set by regulation.

Next slide, FSAR commitments. This is a final type of post-licensing commitment.

What distinguishes the FSAR commitment from the ITAAC or the license condition is what is being committed to. Essentially it includes a commitment to change the incensing basis.

Namely the, well the FSAR. But also can include other aspects of the licensing basis. And it gives the examples of the quality assurance plan, the emergency plan and the security plan.

And the guidance talks about two approaches. Either the license condition approach. And the other one is a commitment for a -- through a routine FSAR update.

And next slide please. And the license condition approach, the focus is on ensuring that the FSAR information is included in a FSAR update. And the need for the information should be established during the licensing review and that the commitment is documented in a license condition.

And then the FSAR update, instead of being tied to a routine FSAR update, under 50.71(e), it would be tied to a specific milestone.

And then the guidance lists several examples of what are appropriate FSAR commitments. Most of those examples come, again, straight from the ISG. There's a sixth example added dealing with vendor information.

The second approach, for FSAR commitments, is really just a, it's very similar, it's just that the FSAR commitment would be done through one of the routine updates done under 50.71(e). And I think that's it.

MR. KEVERN: Okay. Thank you, Don. This document, like the others, are available. Again, we can call them up on the screen if there's specific questions.

But this is one of those topics that, as Don mentioned, was a revision from 2007. Also back in 2010 it was a topic. But there was enough confusion, enough concern about it that we issued an ISG. And now we're in a mode of, in the aggregate, we are trying to retire all of the ISGs.

And so part of that process, as many as possible, they're going to fit into Reg Guide 1.206. And so this is a good example of one that obviously fits right in. Because the topic is identical.

This is not, let me put emphasis on a point that Don made, not a policy change. And we're trying to make that very clear on all the topics we talk about when we're doing an update from 2007. Is there a change, is there not a change?

And I think there is some, perhaps I would say minor disagreement on the last topic of whether there was or wasn't a change in the way we were saying what was being

done.
So I'd like to open for discussion please. Anyone in the room? Kati?
MS. AUSTGEN: I don't think that we had any significant questions or concerns on this one in our pre-meeting. So.
MR. KEVERN: Okay. Any compliments you'd like to make? No? Okay.
MR. HICKS: I got a question. Just a question maybe. Is the DC error issue resolution going to be factored into this?
MR. KEVERN: I'm sorry, is that what again?
MS. AUSTGEN: So there is an active issue right now. I think on preferred terminology is required, design changes.
But for example, some of the AP1000 license applications that are in the queue right now are being held up on having their license issued, due to some problems identified in the design certification through the construction of the current plants.
MR. HICKS: That's another branch. Not you, Tom. The licensing branch. Right?
MS. MORGAN-BUTLER: That's Larry's group, right?
MS. AUSTGEN: Yes.
MS. BORSH: Don knows all about that.
MR. HABIB: Yes. I guess, I mean we're addressing that on a couple different levels. Separate from the guidance.
I don't know that there's anything that we would need to change in the guidance to address that. There really isn't --
MR. HICKS: Well just let me --
MS. AUSTGEN: On the specific --
MR. HICKS: Some of the solutions to that issue would fall onto something, maybe fall into one of those categories. License conditions I meant.
MS. AUSTGEN: But I suspect you haven't gotten to your solution on those issues yet? So it may be a bit early to expect to see those in this.
MR. HABIB: Well one of the, you know, it isn't stated in here, but one of the things that we often hear from our general counsel about license conditions is they have to be ministerial in completing them. In other words, we can't have a deferred review as part of the, as part of a license condition.
MR. HICKS: Yes, I heard that in that meeting we had. The guy said that. But when you look at the license conditions, what they could encompass, just in your own guidance here that comes from the ISG, it seems to me that it would easily fall on to some of these requests --
MR. BELL: Yes, this is Russ Bell. This is COL application guidance.
I'm not sure, it may or may not be the right home for the resolution of the issue that we're talking about, but I mean I see the connection. Given the license conditions as at least one option being considered. But, you know, maybe the resolution of that issue might find a home in another place.

MR. HABIB: Okay. I mean another good point. Again, on the post-licensing commitments, generally there has to be a justification about, why can't it be done now. And when it's, you know, something as-built or you're reconciling something, that's one thing.
If it's an error and really you have all the tools where the applicant would have all the tools to develop their, you know, appropriate information now and include it in a departure, I think that's the approach that the staff is, well that's the approach we're currently following.
MR. BELL: So what --
(Simultaneous speaking.)
MR. HABIB: -- between that issue and this. That's all. I don't want to get into the merits of it, one way or the other. Okay.
MR. BELL: Okay. All right, thanks.
MR. WILLIAMSON: Tom, one more comment. This is Tom Williamson. Just a brief comment.
I understand the operational programs are license conditions, strictly because of schedule. Because many of those operational programs are required by regulation. But they're in there because of schedule, milestone, RP program, fuel on site, whatever.
But in many cases those programs have change control associated with them. And that change control, in many cases, is governed by the technical specification admin controls. Which don't go into effect until 103(g).
So certainly below the problem, an implementation, in controlling change. And we talked some about that, maybe we're going to have to think it a little more creatively about that. But that's just a comment.
MR. KEVERN: Okay, anyone else on the phone? Any questions or comments please? Okay. Thank you folks. So moving on then. The next topic on the agenda, information and change processes for COL applications. And Theresa Clark, back again to talk about this topic.
MS. CLARK: All right. This is Theresa Clark again. So it might surprise you that I wrestled with this one almost as much as I did with the one we talked about previously.
So this is a section, again, that was in the previous version of Reg Guide 1.206. And I got to say that when I read it could have been more clearly written than the original version.
And this is a topic that I was interested in because we've been recently trying to train new staff on how all those change processes work.
So I started off with a very long one that gave, you know, the doctoral dissertation on how all the change processes work and how they fit together for various applications. And Tom reminded me that this is guidance for COL applicants. And so it's been crunched down somewhat to focus on just what COL applicants might be interested in and not everybody, whoever has to do anything with the Part 52 process.
So if you ever want to hear about that, come talk to me. But basically the overview of what you see in this section is that because of the timing and nature of the

various applications that could be referenced by the COL applicant, the various documents that could be incorporated into the application, the change processes can be complex.

And the message here is really just that COL applicants should pay attention to that. And whenever possible make things in their application clear about the source of the information. Just make everyone's lives a lot easier moving forward.

And I think we've been pretty successful with that. So we'll see as things move forward.

So this guidance strips out the variety of permutations and focuses on COL applicants who are... I believe there's some brief mention of custom COLs that doesn't reference anything, they kind of get away easy from this perspective. And then COL applicants who reference early site permits and design certifications.

Next slide. So we're going to have a separate discussion from Mark, I believe, about the finality of environmental information and early site permits and that sort of thing. There's a little bit of overlap there, so I don't want to go into it too much.

We did look at putting those two together, but it didn't make a lot of sense at the time. Well, we might look back at that.

But the bottom line here is that there is a certain finality afforded to an early site permit. 52.39 is the reference there.

But if the COL applicant wants to make certain deviations from that early site permit, variances is the official term there, there's certain criteria that need to be followed.

And there's a section up in the C.1 part, I think, I'll look at the latest table of contents just to point you there. So in C.1.7 is "exemptions, departures and variances." That's the part of the application where a COL applicant would tote up all of these various differences.

And then the actual technical need applies. If it's an okay thing to do would be in the rest of the application.

So there's some discussion in here of the criteria for a variance and what the staff judges those by. And the fact that the applicant would need to identify those.

For the COL applicant who references the design certification, which has been the norm, again, there's finality afforded to a design certification. 52.63 is the reference there.

And it's probably, those of you who have been through this process are familiar, but new COL applicants may not be. There are different tiers to the design certification, there are different change process associated with those tiers.

This is not going to be a meeting where we discuss the future of Tier 2-star. It's just in there as a true statement regarding history. So we're not going to touch that right now.

But the point is there are different change process. COL applicant should be aware when they're

incorporating a DC by reference that they're buying the Tier 1, they're buying the Tier 2, they're buying anything in between.

And if you want to, in your application, make certain departures from that, that can be possible where justified. In some cases you would need an exemption in concert with the application.

You might make a departure that doesn't need staff approval based on certain screening criteria. You might make a departure that does need staff approval. And so designating in the application basically what you're trying to do is the point here. And I believe we've had cases where applicants have been clear about, you know, we're making these departures and we're just letting you know. We're not asking you for your permission.

And then there are certain things, like operational requirements. There's a paragraph in here, I believe a couple paragraphs, about the fact that those are not given finality at the DC stage. They're not matters that are resolved because they're operational in nature.

You could request changes from something done by the DC applicant. Some DC applicants put a lot of meat on operational programs in their applications.

To the extent that that's done, great. COL applicants can reference that. Just be aware that it's usually not included in a finality provision.

So slide 25 here is the short version of many tables that could be created to summarize these change processes. And it just points to the different sections of the design certification rules and to other regulations where you might find those.

Those apply to, you know, a COL licensee ten years down the road that wants to make changes and they apply to COL applicants who might want to incorporate a certified design and make certain tweaks that are appropriate for them.

The part that could be of interest, because it was not obvious to me, is that you could all -- we think about Tier 1 linked to exemptions, it is also possible to have exemptions linked to Tier 2.

If there's a whole chunk of stuff that you just don't want to do, then you could take an exemption -- request an exemption from that. Rather than having a departure that adjusts it.

So it's something that wasn't obvious to me, so I wanted to mention that. And then there's the kind of layers of Tier 2 where some things need staff approval and some things don't.

On Slide 26, this is just kind of my restatement of the idea that COL applicants should pay attention to where information comes from and make it as clear as possible for themselves and for the staff so that we can evaluate changes under the appropriate process.

This is, I haven't completely Q&A'd this picture, but this is the picture we've been using in training recently for our staff to show that when you're a COL

applicant.
We think about FSARs the way we used to for operating plants. You actually look at 52.79. The whole thing is an FSAR. Including what you think the FSAR is. All the rest of it is under the heading of FSAR, so that's sort of like legal trivia for the day.
But a COL applicant might incorporate all of these chunks into their application. And they all have attendant change processes.
So if you have an ESP, you have variances that you might elect to put. If you have plant specific DCD that you're taking from a generic DCD, that has change processes that come from Section VIII of the rule.
The red stuff is, for those of you who can see this in color, is the COL FSAR. Which is outside the scope of the DCD and has traditional 50.59 change processes. That doesn't matter at the stage of application, because we're just reviewing it for the first time, but you should pay attention to that later on.
And then there's a variety of other things that come under the 52.79 FSAR umbrella. Emergency plan, security plan, all that. They've got their own change processes.
So things are not completely clear if you don't delineate them. And so we're just encouraging people to kind of pay attention to that.
And to the extent that your application includes a convention for identifying this information, that probably benefits everybody. And that is that. So hopefully this makes some things clear.
MR. KEVERN: All right. We're getting into a routine here, so, thanks, Theresa. Now we're ready for comments or questions on this topic.
MS. AUSTGEN: Okay. Thank you. This is Katie Austgen, NEI. So we had a question when we looked at the write-up under the Tier 2 process piece. I think it's on Page 3, the last couple of lines in Tier 2. We're wondering if that says what we think it says or how exactly that's intended to work. You had mentioned with reference just to the COL FSAR, you know, in the ones you have a license 50.59 applies and there you have it.
MS. CLARK: To a chunk of it.
MS. AUSTGEN: Yes, to a chunk of it. So with the Tier 2 you have the 50.59-like change process under Section VIII.
MS. CLARK: Yes.
MS. AUSTGEN: Are these couple of lines saying that if an applicant applies the 50.59-like change process to Tier 2 and determines that it's a departure they can make without prior NRC approval that the NRC staff will look at that section, recognize oh, the applicant has taken a departure, and rather than getting into all the details of that departure evaluation simply look to see that the finding from the design certification is still valid with that departure and move on?
MS. CLARK: I believe that is the case and I believe that's what we've done on applications that have

identified those sorts of departures that don't need our review. I can double check that based on history.
MS. AUSTGEN: Okay.
MS. CLARK: But I know that there had been applications that have delineated "here are some departures that we think you need to review and here's some that we're just letting you know about for completeness sake."
And I'm pretty sure we don't spend time re-reviewing those because if, let's say they remained silent and the license were issued, they could go the next day and just make them with the proper notification on the proper schedule if they had the right criteria.
MS. AUSTGEN: Okay.
MS. CLARK: So I don't think we get too involved that, but I'll make sure that it matches recent history.
MS. AUSTGEN: Okay. Or if it doesn't match recent history but it is your intent moving forward --
(Simultaneous speaking.)
MS. AUSTGEN: -- how might we ensure that that future comes to reality?
MS. CLARK: Well writing it down is important, so I'll take a look at that. But I mean that's the whole point of having these sorts of change processes that screen the level of things that we need to get involved in. We don't -- That's why 50.59 exists in those sorts of processes, so that we get involved in the safety-significant changes.
MS. BORSH: Well following up on what Katie said and you said, Theresa, so what does that mean "will be considered resolved," because from Dominion's perspective we have had our departures reviewed by the staff. They weren't looking at them.
MS. CLARK: Were they departures that met that change criteria?
MS. BORSH: Yes.
MS. CLARK: To not be reviewed?
MS. BORSH: Right.
MR. HICKS: That's pretty typical. I think that's pretty typical.
MS. CLARK: Okay.
MS. BORSH: Yes.
MS. CLARK: I'll just have to look at that. I think some of this was in the previous version and so I was quoting and fiddling around with it, you know, but the matters resolved is a word from regulations and so --
MR. HICKS: Yes, the previous version of that Reg Guide was a little less specific and I think in one of our previous meetings we asked that it be more specific and we provided some feedback I think.
MS. CLARK: Yes.
MR. HICKS: And this looks like that is the feedback that we asked for, but I think what we are asking for is if that --
MS. CLARK: Whether we need it?
MR. HICKS: That's not what is currently being done and I think we probably want to feel more comfortable that that section can be strengthened before a future COL applicant wants to include a whole bunch of departures

for a plant that's been built already and wants an application instead of waiting till later for that.
MS. CLARK: Right. It would seem to make sense to put it all together, but I understand what you are saying.
MR. HICKS: It would seem to make sense except when you look at the fact that if you put 500 departures in your application you're setting yourself up for possibly having a lot of RAIs, whereas if you waited until after you received a license they go in with the semi-annual report.
MS. CLARK: Right, I understand. And so if there is a disconnect there that we can help out with, I'll take a look at that.
MR. HICKS: Yes, there is a big disconnect in it, but, yes, okay.
MS. CLARK: Yes, so I can't speak to past practice, but I can at least look and check with the lawyers on what's okay.
MS. BORSH: And related to that, we talked about this, Tom brought it up in our pre-meeting, the last sentence in here says "The NRC staff will not re-review these departures."
So one could assume, interpret that to mean the NRC staff will not review what we've already, what the applicant has already reviewed or does it mean that the NRC staff isn't going to re-review from a review that they had done before.
I don't know. The wording is just a little --
MS. CLARK: Okay, yes. All right, so here's what I thought I meant when I wrote that, and given all of this discussion I think we need to check with OGC to make sure it's actually true.
What I thought was the idea being if you are making a departure below a certain threshold my understanding of it personally was that it basically wasn't affecting the previous safety decision and so you weren't kind of re-reviewing that safety decision.
MS. BORSH: Right.
MS. CLARK: And I think that's what the intent was there and that's what I thought the rule said, but we'll make sure before we make something like this final.
MR. HICKS: Yes, that's a very valid point because when you get these RAIs on these departures the reviewer's point is I have to write my SER, I need this information to write my SER, so he has to issue an RAI.
Even though it may be on a departure that we've evaluated it does not require prior NRC approval. So I think the point needs to be made in here that the staff needs to rely on the existing design certification safety evaluation in that area where the departure is and, you know, that should be sufficient, you know, to go forward.
He doesn't have to recreate a safety evaluation for that departure.
MS. CLARK: Right.
MR. HICKS: Right. That's --
MS. CLARK: Yes, I understand the intent there.
MR. HICKS: Okay.

MS. CLARK: I'll take a look.
MR. KEVERN: Let me insert a question for the topic we're talking about, would that be where the hypothetical applicant has identified this in its list of departures or --
MR. HICKS: Oh, yes, it would be in Part 7.
MR. KEVERN: Okay.
(Simultaneous speaking.)
MR. KEVERN: And it would be listed as something that's not requiring the applicant's evaluation, just indicates it's not required in staff review?
MR. HICKS: Yes.
MR. KEVERN: Okay. So this a topic that we need to make sure that we not only include in the topic Theresa has written but also the other corresponding topic where we've got the departures exemption and so on so we've got the same words both places so we can cross reference back and forth.
MR. HICKS: Right. And I'll just -- This discussion of operational requirements, you know, if you read the regulation a COL applicant needs to do exemption during the application phase for operational requirement, right, okay.
If you change something after, I mean but then operational requirements don't get carried over with finality in a DC. And if you can ask, the question that we always ask is besides the tech specs, which is called out specifically, what other operation requirements are actually defined in the design certifications.
You look in the design certifications that I've looked at, which is probably most of them, none of them specifically identify what is an operational requirement other than tech specs, which is called out in the rule itself.
So, technically, if you look at the rule certification language, operational requirements, if you wanted to change an operational requirement in a design certification document post-COL issuance, since it has no finality I don't think, it's not even covered under the, I don't think it's technically covered under the departure rules, it's going to change with 50.59.
But nobody does it that way because nobody has defined what are the operational requirements in the DC's in the present sense.
MS. CLARK: Right. If it was new content that wasn't covered by the DC then, yes, that would --
(Simultaneous speaking.)
MR. HICKS: But what I mean is let's say there's a fire protection program discussion in DC. Some people might say a program, hey, that's an operational requirement, you know. So does that fall under this operational requirement language in the rule?
Nobody's made that leap because it's not, those discussions in the design certification documents aren't identified as anything other than the text before or after, you know what I mean.
MS. CLARK: Yes.
MR. HICKS: They're not identified as operational

requirements.
MS. CLARK: Right.
MR. HICKS: So no one could apply the rules to those because nobody knows what they are.
MS. CLARK: Right. Now there is a defined set of 16, or whatever the number is, operational programs. I am not 100 percent sure that those are the same operational things, so I need to go back and check.
MR. HICKS: Operational requirements, it's not defined in the rules, and operational programs, that's a whole other thing that COL applicants put together later.
MS. CLARK: Right. But, and so I think there is a whole different section on that.
MR. HICKS: Yes.
MS. CLARK: Some DC applicants have chosen to put in what we call the full description so that COL applicants don't have to do anything after that.
MR. HICKS: Yes, but see if, but --
MS. CLARK: That's the program.
MR. HICKS: That's the problem. See technically they don't have finality but if I was going to make a change to that in the future I would write a departure package because it's Tier 2 text, you know what I'm saying. It's not identified as an operational program description, it's --
MS. CLARK: Or an operational requirement.
MS. BORSH: Or I mean operational requirement, right. It's just Tier 2 text.
MS. CLARK: Yes, I think we need to clarify the distinct --
(Simultaneous speaking.)
MR. HICKS: And I think we had provided guidance on this in an earlier meeting about the fact that, you know, if you're going to write guidance in here for design certifications they ought to say if you're going to put out operational requirement information it ought to be identified in some way like they do for conceptual design information, you know.
MS. CLARK: Yes, okay. Yes, we'll look at that. I hadn't realized that confusion point.
MR. HICKS: And the last time it was on this drawing --
MR. BELL: If you can solve that --
(Simultaneous speaking.)
MS. CLARK: It's probably --
MR. BELL: You're a genius if you're able to do that.
(Simultaneous speaking.)
MS. CLARK: At a minimum just take out the paragraph.
MR. BELL: -- for years, but there is an VII.B.5.C.
MR. HICKS: Right.
MS. CLARK: Yes, yes, and that's why it's in here because we were --
MR. BELL: But what that paragraph applies to is not well understood and I don't think it has been.
MR. HICKS: It's tech specs and other operational requirements, which, you know, everybody knows what tech specs are, but what's the other stuff.
MS. CLARK: Right. Yes, so we'll find at least what history research we can do there and see if we can add

any clarity.
MR. HICKS: See, look, the other thing is on this figure, this is a COL section that we're referencing, right?
MS. CLARK: Yes.
MR. HICKS: Well a lot of COL licensees don't consider Tier 1 part of their FSAR, okay.
MS. CLARK: Yes.
MR. HICKS: It's part of the design-specific DCD, but not the FSAR, just so you know.
MS. CLARK: Right. And so this was sort of a trivia point that I was making before where from a 52.79, you know, what the first words of that rule say you'll submit an FSAR that includes A, B, C, D, Q.
MR. HICKS: Yes.
(Simultaneous speaking.)
MR. HICKS: But I don't think Tier 1 is that list though is it?
MS. CLARK: I think the plant-specific --
MR. HICKS: This is the COLA section. COLA sections don't have any discussion to Tier 1.
MS. CLARK: The plant-specific DCD which is derived from the generic DCD I'm pretty sure is a piece of that, but we'll check.
MR. HICKS: Okay, you can look into that. But I don't think COL licensees consider Tier 1 part of their FSAR decisions.
MS. CLARK: As a common language for vernacular you definitely don't, I understand, this is sort of a legalistic point.
MR. HICKS: Okay.
MR. OESTERLE: This is Eric Oesterle from the staff. I might have some clarifying points, maybe a little bit. In previous discussions regarding operational requirements the only example that I ever heard in addition to tech specs was the example of identifying requirements grants for ECCS pumps in order for them to perform their safety-related function.
But if you pull that thread a little bit more, you know, we might find that that could be an ITAAC as well, so I understand your concern about the issue and it was similarly murky way back when I was involved with this as well.
MR. HICKS: I'll give you another example, Eric. I was in a meeting with your IST reviewer, who we all know who that is, a good guy, Tom, and he basically made the point that the in-service test frequencies that are in the DCDs, that there is a table that has in-service testing and it has the frequencies in there.
His point was that those were operational requirements and have no finality. So when COL licensees submit their IST programs, you know, those frequencies, the staff doesn't have to go by those.
MR. WILLIAMSON: There are operational requirements everywhere.
MR. OESTERLE: But their own programs.
(Simultaneous speaking.)
MR. WILLIAMSON: -- regulatory guide.

(Simultaneous speaking.)
MR. HICKS: But his interpretation was that --
(Simultaneous speaking.)
MR. HICKS: Yes. His interpretation was those were.
MR. WILLIAMSON: They are everywhere.
MR. OESTERLE: Well that is interesting, I hadn't heard that before and, you know, I think we could have different interpretations of that in itself ourselves.
MR. WILLIAMSON: Yes.
MR. OESTERLE: I mean if you take a look at what the staff does with ASME codes, right, we can condition codes and we can say no, this frequency is not, you know, is either too long or too short, usually we say it's too long.
So we could condition even things that, you know, we endorse from ASME. So you might have a point there, I'm not sure.
MR. HICKS: Again, it's in the DC and it gets certified boy that's final, right? I don't know? Apparently not.
MR. OESTERLE: So the other inside one to add was, and hopefully I am adding something, the discussion about the, of the Tier 2 departures, you know, going through the 50.59-like process and determining whether you need an exemption or not and if you don't I mean there are reporting requirements in Section X of every DC rule, right, but I don't recall, and maybe some of the confusion is that if applicants identify all of those departures that they've taken that don't require prior NRC approval and, you know, and they're a COL applicant, that that might provide, you know, a reviewer something to say hey, I want to take a look at these, which we can anyway, but I think you point is well taken.
They don't need to look at them in order to make the safety case because the review has already been done to determine that the safety case is not violated, if you will.
But there is always the opportunity for inspection of those, of the evaluations, which is what the reporting requirements say to do, it maintains, you know, those records so that we can inspect them if needed.
MR. HICKS: Yes. Right. And some of the other, some of the FSARs on COLs have said they have done audits of those programs, and audits are fine.
I mean look at the, you know, the process that was used to make those determinations, but, you know, what's, the sensitive point with us is that if you have 500 departures, you know, we don't want the staff reviewing every one of those because the rule says that they don't have to.
MR. OESTERLE: And I agree, they probably should be prior to the 52.103(g) finding it should be audit rather than inspection.
MR. HICKS: Yes.
MR. KEVERN: Any other comments or questions on the phone, please? Oh, I'm sorry, Gina?
MS. BORSH: I have a question about Tier 2. This is much less significant than what you all were talking

about, but, okay, Tier 2-star: COL applicants can take departures from that content, correct?
MS. CLARK: Not without prior approval.
MS. BORSH: Yes, that's right, okay. Now when we take, when a COL applicant takes a departure from Tier 2-star is the implication that the COL applicant is replacing, or placing in the FSAR, is that, what's the label for that or the designation for that information?
MS. CLARK: Right.
MS. BORSH: We take a sentence out of Tier 2-star and we replace it with another sentence. Like does it --
MS. CLARK: You mean like does it still have a star next to it now?
MS. BORSH: Yes.
MR. HICKS: Question this because it should be written in as Tier 2-star. You know, italics, bracketed, asterisks, because future changes, what happens if future changes to that affects --
MS. CLARK: Right, right. So it's a good question and I will think about it.
MS. MORGAN-BUTLER: And we also have a working group that will get into that.
MS. CLARK: Right.
MS. MORGAN-BUTLER: The Tier 2-star.
MS. CLARK: Sure. And that's on the whole scope of Tier 2-star.
MS. MORGAN-BUTLER: Yes.
MS. CLARK: For a design that has Tier 2-star that it hasn't gone away, I think that's your question --
MS. BORSH: Right.
MS. CLARK: And so I think they're, and you maybe only asking about one of these, but there are some situations where a license amendment request might come in to say I don't want this to be Tier 2-star anymore, can you please make it Tier 2.
And in that case the replacement text would be Tier 2 if the staff agreed that that was the right safety decision.
MS. BORSH: Yes.
MS. CLARK: I could see situations where you would replace, I don't know, some sort of number with a different number that would stay just as much Tier 2-star as it always was.
MS. BORSH: Right. Well that's my question. Because some people read Tier 2-star as being a DCD construct --
MS. CLARK: Yes.
MS. BORSH: -- and not a COL applicant construct, so can a COL applicant, should a COL applicant be creating Tier 2-star information in those cases?
MS. CLARK: Yes.
MS. BORSH: And then to complicate it further, what if you have an applicant that is not changing Tier 2-star information, but is supplementing Tier 2-star information and more information about the plant-specific conditions that supplement the DCD content, is that Tier 2-star information or not?
MS. CLARK: My non-legal opinion is maybe not, but we'll check.

MS. BORSH: Okay. Yes, I guess so my general question here is changes to Tier 2-star information. It's not very clear, you know, those are some questions I as a COL applicant would have that don't seem to be addressed in this section.
MS. CLARK: Right.
MS. BORSH: What do you do? You know, it says, okay, you take a departure, but then what's the status of that new information that's creating the departure.
MS. CLARK: Right. Yes, I hadn't thought about it that way, but I think that's certainly a point for our lawyers to ponder, so I'll think about that.
MS. BORSH: Okay.
MS. CLARK: Yes, so I mean Kim mentioned the activities that we're doing on Tier 2-star, but that's a forward-looking approach and so for plants that are already licensed that way it is what it is and we'll need to deal with these sorts of situations.
MS. BORSH: Yes, right.
MS. CLARK: And I believe we already have looked at a variety of license amendments that relate to that area, so I just have to see what we did there.
MS. BORSH: Okay.
MR. BELL: Theresa, can I ask you, this is a quick question?
MS. CLARK: Sure.
MR. BELL: I'm on Page 2.
MS. CLARK: Okay.
MR. BELL: Under "Changes to Tier 2 Information."
MS. CLARK: Yes.
MR. BELL: So the second to the last paragraph it includes information required by subsections blah, blah, blah, and then there's a string "except tech specs, conceptual information, supporting information on ITAAC," okay.
So my question is I kind of understand the list, what do you mean by supporting information on ITAAC, do you have an example?
MS. CLARK: I don't.
MR. BELL: Okay.
MS. CLARK: I think this came out of the previous revision, so I don't have one on the tip of my tongue.
MR. HICKS: Does that mean, you know, information in Tier 2 that's duplicated in Tier 1?
MS. BORSH: No, because that is Tier 2.
MR. HICKS: No, it says, well --
MS. BORSH: What I'm saying is that information is Tier 2.
MR. HICKS: Yes, that would be information --
MS. BORSH: Because Tier 1 is created from Tier 2 information.
MR. HICKS: Yes.
MS. BORSH: Yes.
MS. CLARK: I'd have to go back and look. I am sure someone wrote that phrase at some point meaning a very important distinction, but I don't have it at the tip of my tongue.
MR. BELL: Yes.

MS. CLARK: I'll take a look.
MR. BELL: Thank you.
MS. BORSH: You know there is that section in Chapter 14 that talks about ITAAC.
MS. CLARK: Yes, but to say that that's not part of Tier 2 I'm not sure.
MR. BELL: Yes, that would be Tier 2.
(Simultaneous speaking.)
MS. BORSH: Yes. No, but what I am saying is it describes the ITAAC program.
MS. CLARK: Yes.
MS. BORSH: It's not so much, it's not about design detail.
MR. BELL: Oh.
MS. BORSH: I don't know. It's --
MR. OESTERLE: This is Eric Oesterle from the staff again. That discussion was always meant to include, or to allow applicants to include in the document some discussion of perhaps a test that they would run and maybe what methodologies might be used if an ITAAC specified performing a test in the ITA.
You could go back to the Tier 2 document and find out more information about what that test might entail or if there is an analysis that was specified.
There might be some discussion about, you know, what the parameters of the analysis or the scope of the analysis might be, what the methodologies are that may be used for the analysis and that sort of thing. Just an opportunity to provide some more information for the ITA.
MR. HICKS: So you're saying that's not Tier 2?
MR. BELL: We would understand that to be Tier 2 information.
MS. CLARK: Yes. So I need to look at this because if you look at --
MR. BELL: Right?
MR. OESTERLE: No, I'm not saying that isn't Tier 2, but I don't recall if it's Tier 2 either, so --
MS. CLARK: Yes.
MR. BELL: Typically no.
MS. CLARK: So for people who may or may not be following along, in the sentence here you could understand, okay, I've got generic technical specifications, I'm going to replace the bracketed information so it makes sense for that to be something else, you know.
Conceptual design information I am going to replace with a real design, so that's something else, I'm not 100 percent, the same with COL information.
MR. BELL: Exactly.
MS. CLARK: So I got the point and I'll take a look.
MR. OESTERLE: Thank you.
MS. CLARK: Thanks, Eric.
MR. KEVERN: Okay. Other questions, comments? On the phone, please, anyone else?
(No audible response.)
MR. KEVERN: All right. So as planned we are right on time, great job folks. So, 3 o'clock, time for a break and I have, as noted on the agenda I've got a half hour

scheduled for a break because previously I scheduled 15 minutes, well everyone took a half hour and I was never able to get the meeting reconvened again.

So I'd like to put that up for a vote if there would be, if there is an interest in disciplining ourselves, a 15-minute break, we're going to resume at 3:15 or do we need a whole half hour?

So I hear a nomination and a second for 15 minutes. So we will break and reconvene at 3:15. Thank you.

(Whereupon, the above-entitled matter went off the record at 2:57 p.m. and resumed at 3:16 p.m.)

MR. KEVERN: So moving along, we're on the fourth topic of the day. This topic, C.2.15, Environmental Issue Finality for COL Applicants, is once again a topic that was addressed in the 2007 version of Reg Guide 1.206 and so we are revising that topic and Mark Notich is going to be the presenter for this topic. Mark.

MR. NOTICH: Thank you, Tom. Again, I am Mark Notich. I am a Senior PM in the Division of Advanced Reactors and Rulemaking. Prior, through that life, I have spent nine years doing environmental impact statements for all reactors.

I worked on Vogtle, I worked on Summer, I worked on the South Texas plant, so I have a little bit of background in this area. I'll start off on Slide 29.

Again, the first number there, our ML number is the ML number where you can access the text of C.2.15. Again, we intend this, this is going to be, and this is to update Reg Guide 1.206.III.C.3, which is a current Reg Guide 1.2016 chapter.

As an overview I'd like to say a couple things. First of all, there are two actions by the Commission that have finality with respect to environmental issues, one is an early site permit and the other is a design certification.

And let's keep in mind that an early site permit is an authorization by the Commission that a site is suitable for the construction and operation of one or more reactors of a certain design or that fit within a plant parameter envelope.

Again, it is not an authorization to operate or to build. It just says that this site is suitable. A design certification is a decision by the Commission that a design has been looked at by the staff and meets all the requirements for safe operations.

Okay, a full review, Section 52.39, what that says is that the Commission may not change or impose new site characteristics, design parameters or any other topics within an ESP unless certain things occur, all right, such as issues, information that would bring the permit into compliance with, or I'm sorry, information that becomes known that would bring the permit into compliance with NRC regs, information that is needed to modify the permit to assure public safety and health, and, again, any new information that becomes available that alters the conclusions made previously by the Commission, all right.

52.63, this deals with the design certifications. The

Commission, it may not modify the certification unless the Commission in a rulemaking, that's a very important clause, in a rulemaking, determines that the design, again, needs to be brought into compliance with NRC regs or it needs the Commission -- Oh, it needs to modify the DC in order to assure public safety and health, and there is a list of some other conditions also set forth in 52.63.

Okay. An ESP can be modified if the Commission action has not been taken via a supplemental EIS, all right. A real world instance of this is, you know, we finished an EIS, it's been sent up to the Commission, but the Commission has not held other mandatory hearings yet, something new comes up, a new species gets added by the U.S. Fish and Wildlife to the endangered species list, okay.

Then the staff has got to go back and do a supplement to that EIS, all right. Once the Commission action has been taken, all right, the ESP has been issued, then, okay, it can be changed if new and significant information has been found.

Now there has always been some, not fogginess, but, you know, a little bit of discussion, what is defined by new information. And the staff and the Commission has stated that it is information that was not considered in preparing the ESP ER by the applicant or the EIS by the staff, all right.

And it was not generally known or publicly available during, of the preparation of the ESP EIS, okay.

Now, okay, going on to the word "significant," now this again, this has been talked about and debated, but the staff's definition is if the new information has the potential to change and impact assessment for a resource that is significant information, okay.

Again, if the information has potential to change a small impact assessment to a medium impact assessment for ecological resources, again, based on a U.S. Fish and Wildlife Service listing, that is significant information, all right.

Okay, and the final -- Yes, back to the first slide, I'm sorry. And the final point is again, I talked earlier about a finality for a DC. It can only be done in a rulemaking and, again, to address certain I guess shortfalls or to address new circumstances and conditions.

Next slide, please. Thank you. In an application for a COL referencing an early site permit the applicant must comply with the requirements of 51.45 and as well as 51.50, all right.

Now the environmental information in an ER for a COL referencing an ESP must contain, among other things, any new information related to environmental impacts of construction and operation and were resolved in the ESP proceedings.

Now, again, the information, in the COL application referencing an ESP, and I'm going to get tired of saying that, must demonstrate that the facility falls within the announced design in the ESP or within the plant

parameter envelope that the ESP EIS was and based on, all right.
It is up to the applicant to revisit the information in the EIS and determine whether it has changed and then to state that in the COL application, all right.
So how does the applicant do that? Well according to the regs the applicant must have new and significant information, must develop a new and significant information process, all right.
That is to look and see if there is new information, again, new, based on my definition earlier, if any new information has come to light since the action was taken by the Commission on the ESP.
The NRC, you know, we don't have any specific regulations on how applicants do that. What we will do and, again, this is in the, at my fourth bullet, we will come and do an audit of your new and significant information process and what we are looking for is two things.
One, is the process viable, will it provide any new and significant information that has become available since the Commission has taken the action on the ESP, all right.
And, two, did the applicant follow their own process.
So those are the two things. Now we did this earlier this year for a South Texas plant and the reason why was the South Texas plant EIS was issued in 2010, so it's -- Then they came in and said okay, let's get our COLA going, let's get that, you know, let's get our like COLA issued so we can like start building.
So it was five years since the COLA EIS was issued and when the project started back up. That's a very significant length of time, all right. So we said okay, well there's got to be a new and significant information process done and the staff has to verify that and that's what we did.
So there is a report, there is a report on that process in ADAMS, I don't have the audit number with me, but we have gone through that process. We have also looked at the other extreme and that was when Southern came in for their COL application for plant Vogtle we were not done with the ESP yet.
So what we had to do was to put any activities regarding the COL on hold until the ESP action had been taken. So Southern came in in March of 2011, '12, I forget, one of those years. No, no, no, it was 2009, '08, '08 or '09.
Anyways, so we had to wait for I think it was 18 months to really do anything on the COL application because we had not finished with the ESP and on the day that the ESP was issued then we could start looking at any new and significant information that came up during that 18-month period.
Southern did their process, they looked at if there was any new information and the staff verified that there was a process, it was viable, and that Southern followed it.
So that, you know, in terms of environmental stuff,

that's the really big issue in terms of finality, all right.
You know, once you have it, you know, and then you come in -- Oh, I'm sorry, once you have your ESP and you come in with your COL application there is that gap and something could happen, new information could come up, and that's one of the ways that, you know, the finality of a particular issue can change, is if new and significant information has been found regarding that specific piece of information, or that assessment, that impact assessment, it can change, okay.
Next slide, please. Okay, DC. Okay, now an ER for a COL referencing a specific DC is required under 51.53 to do two things, address costs and benefits for the Severe Accident Mitigation Design Alternatives, or SAMDAs, and also include the basis for not incorporating SAMDAs in a design. That's strict, word for word out of 51.53.
Now the staff develops an Environmental Assessment, EA, for a design certification because there is no specific site for a DC, it's for a design.
It isn't like, you know, plant Vogtle or Summer, so the staff does an EA. And, again, the DC has a finality unless the Commission determines in a rulemaking, which everyone knows takes a long time, that the DC does not meet either applicable applications, is necessary to provide adequate protection to public health and safety on the common defense and security, or due to some other conditions set forth in 52.63.
So I guess, you know, the main point to come out of this is, you know, new and significant information is a very important thing for the staff, all right.
The applicant must have a process for that, the staff will come and look at that process and see if the applicant followed in that process, and the staff may also want to go out and verify some of that information by itself or we can say we want to pull the string further on this one issue and maybe, and we'll go further with it, all right.
So that's a very important step with regards to a finality. It's there unless something new pops up, okay, and that's basically it. Any questions?
MR. KEVERN: Okay. Thank you, Mark. Questions, comments on this topic? It looks like Kati is ready to say something.
MS. AUSTGEN: I am ready. Mark, you mentioned endangered species and those recently added.
MR. NOTICH: Yes.
MS. AUSTGEN: So were there any lessons learned from the recent Fermi experience dealing with endangered species being added to the list that perhaps you incorporated here in this section or what were the staff's thoughts on how that could be addressed, particularly maybe the question of whether the staff is able to look at that information and make the finding on their own or whether they must get consultation with outside agencies, that sort of guidance?
MR. NOTICH: Okay. I'm going to have to punt on this

one because I was not the environmental project manner, but I will get you the answer to that.
MS. AUSTGEN: Thank you.
MR. NOTICH: That was Alicia Sutton and, yes, I will get you the answer to that question. Sorry, I just didn't have any particular dealings with that site. Anything else?
MS. BORSH: I'm just curious, Mark, if I read this correctly you defined what "new" is in the "new and significant" term in here --
MR. NOTICH: Right.
MS. BORSH: -- but I don't think I saw the definition of significant in here from the secular -- Is that, it's probably in here and it's just --
(Simultaneous speaking.)
MR. NOTICH: The actual overview?
MS. BORSH: In the --
MR. NOTICH: I'm sorry, in the actual --
MS. BORSH: Yes. So it's just a comment that it might help you to --
MR. NOTICH: Okay, all right. Right. Yes, and where that first appeared was in the statement of considerations for, is it Part 51, 52, whatever it was, put out in 2007, that's when it was defined. So, yes, I'll make a note to include a definition of significant.
MS. BORSH: And I think it's in an old SECY, too.
MR. NOTICH: Okay.
MS. BORSH: 06-0220 if you wanted to use that.
MR. HICKS: Is this also ISG 26?
MR. NOTICH: Yes. Yes, but then that information in ISG 026 came from the statement of considerations back in '07.
MR. HICKS: So this guidance that you guys -- Oh, I'm sorry. This guidance you've written incorporates ISG 26 guidance into it then?
MR. NOTICH: Yes.
MR. HICKS: Okay.
MR. NOTICH: Yes. I'll go back to verify it.
MR. KEVERN: Yes, let me clarify that. This partially incorporates ISG 26, correct, Mark, because we are not retiring ISG 26 based on this draft guidance here?
MR. NOTICH: Hold on. No, we're going to -- No, no, ISG 26, and I don't know if I'm talking out of school here, but what our plan is is to, we are in the process of developing Reg Guide 4.2, which is, you know, which is guidance to applicants for preparing environmental ERs and we are in the final throws of getting that issued and published and having a public meeting, and the information in ISG 26 will be included in that, okay.
MR. KEVERN: So if we tack the new sentence together Reg Guide 4.2 will be the place where we note that we are retiring ISG 26?
MR. NOTICH: Yes.
MR. KEVERN: So we've got several moving parts here and we're trying to keep them all together.
MR. HICKS: Yes, I was just -- The new and significant thing there's already guidance on that, right?
MR. NOTICH: Oh, yes.

MR. HICKS: Yes, you're just taking it out and putting it in the Reg Guide, right?
MR. NOTICH: Yes.
MR. KEVERN: And one of the things we need to be careful of is we just cross reference the definition and don't try to restate it multiple places.
MR. NOTICH: Right.
MR. KEVERN: Okay.
MR. NOTICH: Yes. Yes, and, again, you know, it's very important that people understand what the definition of those terms are. It's easily to get kind of crosswise with them, especially what is significant.
Okay, because information can be new and not significant, all right, and in that case that's nice, but if it's new and significant we need to know it, all right.
I'm okay. I didn't mean to be so flip about being new. If it's new, if the applicant identifies it as new, okay, that is an opportunity for us to say well, maybe we're going to pull that string, yes, a little bit, and do an independent verification, you know.
And there is always a possibility that new information will become aware, or the staff will become aware of new information via its own actions rather than through the applicant, okay.
MS. BORSH: So I know this is not exactly related to 1.206, but did you just say that you were issuing a Reg Guide 4.2 to provide guidance on how to write environmental reports?
MR. NOTICH: Yes. Yes, Reg Guide 4.2 was first issued back in '75, in the early '70s.
MS. BORSH: Okay.
MR. NOTICH: And it is entitled "Preparation of Environmental Reports for Commercial Nuclear Power Plants," or something along like those lines, right.
MS. BORSH: So you are not thinking of changing NUREG 1555 like you are 0800 to consolidate?
MR. NOTICH: No.
MS. BORSH: Okay.
MR. NOTICH: No.
MR. KEVERN: Is that a suggestion?
(Laughter.)
MR. NOTICH: No, no, no. No, 1555 is yay thick, you know. No, way, way too much money. But 4.2 was so out of date.
MS. BORSH: Yes.
MR. NOTICH: It was just, I mean nobody was using it and it was intended to be guidance to you guys, industry, on how to prepare ERs and, you know, there is that big push now that if your application isn't right it's coming back.
MS. BORSH: Right.
MR. NOTICH: So, you know, an ER is a critical part of that application, so that's got to be right, so we at least figure well, you know, and we can't leave industry just kind of hanging there, you know, using a 40-year-old guidance document. No, that's going to work, okay.

So, again, you know, hopefully soon, I don't know exactly when, but, you know, we are in the final steps of getting 4.2 issued. I think that you should be seeing a notice for a public meeting within like the next several months.
MS. BORSH: Okay, thank you.
MR. NOTICH: Yes. Anything else?
(No audible response.)
MR. NOTICH: That was easy, come on guys.
MR. KEVERN: On the phone, any comments or questions?

(No audible response.)
MR. NOTICH: I know that you are all holding your questions for Courtney.
(Laughter.)
MS. ST. PETERS: Thanks, Mark.
MR. KEVERN: Okay, thank you, Mark.
MR. NOTICH: Sure, Courtney.
MR. KEVERN: Okay, moving on to the next topic of the day and as mentioned earlier this is a topic that the staff is less certain about. It's one of the topics as we were wrestling on what to include or exclude in the scope of the revision.
You folks suggested that we address consensus standards and we have some information on this. Courtney has led some staff effort to try to determine what we think might be appropriate or how we can go forward, not only with what options there are but what constraints we have being a government agency, and so we're going to talk about that a little bit.
And hopefully you'll tell us whether we're hitting the mark as far as the approach we are starting with or not and we're going to have some engaging discussion. So, Courtney.
MS. ST. PETERS: Thanks, Tom. So as Tom said I am Courtney St. Peters. I am a Reliability and Risk Analyst. Thanks, sorry. I talk kind of quiet, so you'll have to let me know if you can't hear me.
I have been working with Donnie Harrison and my Branch Chief, Lynn Mrowca, to try and kind of figure out what we think might be a potential scope for this topic. But since it was suggested by NEI I first want to start and ask if this is still a topic that you guys think should be included in the Reg Guide revision. Because if not then my presentation is done.
I tried. So some of the potential scope topics that we have talked about based on past experiences or interactions or feedback was kind of the executive order for using consensus standards.
The NRC's management directive, which kind of gives us some guidelines on it and then just various other topics that have come up here and there. So, next slide, please.
So just real quickly, the OMB Circular is just on federal participation. This one gets talked about a lot, but this slide goes hand-in-hand with my next slide because the next slide is the NRC position on the OMB Circular. So I guess let's just go to the next one. Can you go

to the next slide, please?
So the NRC position on the OMB Circular is that it's not binding, we voluntarily follow that guidance, which was to use voluntary consensus standards in place of government unique ones unless they are inconsistent with the law or impractical.
And then we also talk about the endorsement of standards in this management directive. There is a couple different ways we endorse standards, whether it's by reference in regulations or in documents such as Reg Guides, NUREGS, Standard Review Plans, and, also, the management directive nicely defines a consensus standard, what the NRC considers it to be.
So if you can go to the next slide, please. So then a few other potential topics that we thought about might go into this section are codes and code cases because usually you hear standards and codes talked about together.
The RIS 2007-06, which has to do with revisions to PRA standards, as I said I am a Reliability and Risk Analyst, I am in the PRA Branch, so this is something we've had a lot of experience with, a lot of discussions, it's kind of unique.
And then trial use standards, which once again this is from past experience with being in the PRA Branch we've had a few meetings about trial use standards with industry.
I know there was some discussions about what they are, are they consensus standards, that would be for OGC to weigh in on if this is a topic that you guys feel is necessary to be in there.
It's also being considered in being added to Management Directive 6.5, which I referenced earlier, to kind of maybe give some more clarification on that topic.
So that's just my presentation. These were just a few things that we thought about based on our experiences. I am really looking for some feedback from you all's sense, as kind of was your suggestions, so if you could kind of give me what was a little bit behind that or some other concerns or comments you guys have that would be helpful in the preparation of this section. So, questions, comments?
MR. KEVERN: Okay. And before we start, Lynn Mrowca, the Branch Chief that Courtney just mentioned is in the audience. So, Lynn, before we open up to industry is there anything further you would like to add on this topic?
MS. MROWCA: No. I think I would like the answer to that question also. What were you looking for because this could be a very good discussion and something to add to the Reg Guide to help you with your submittals. How far do you go?
MS. ST. PETERS: Because they can't hear you.
MR. KEVERN: Come on down, Lynn. Okay, Kati, I can see you are ready to go again.
MS. AUSTGEN: Yes. Well so I'll start out and I am sure this is something that's not news to Lynn and Courtney and anyone in the PRA Branch, but we still believe from

the industry perspective that any standards issued for trial use or pilot application must be fully piloted before the NRC can endorse them.
I just think that makes sense to fully understand how that standard would apply before we go using it for everyone. And then on the codes and the code cases I don't know if, Howard, do you want to elaborate on any experiences with codes and code cases, how they are applied or --
MR. MAHAN: I'm sorry, I've got nothing.
MS. AUSTGEN: Yes, you got nothing, okay. It is possible that we suggested this like a year ago and totally forgot.
MS. ST. PETERS: I think this was suggested around the time that we were having the discussions on trial use standards.
MS. AUSTGEN: Okay.
MS. ST. PETERS: So that's kind of why we decided to lead the charge on this because of bad experience.
MS. AUSTGEN: There you go. So it's possible that that's it. Just to conserve I am fully vetting those trial standards.
MS. MROWCA: And I think in a public meeting we agreed with that and so having it in a regulatory guide so it's clear to everyone would be a good thing.
And like I said we also have talked to our staff who deal with our management directive and including it in there is even better for us internally so we are all consistent in applying it the same way.
MS. AUSTGEN: Okay.
MR. HICKS: So this proposed section would list these standards or what?
MS. MROWCA: No. I think it would just talk in general about trial use standards and their standing, which is what was really important.
MR. HICKS: I see.
MS. ST. PETERS: Of course, if you have more to add, but that was -- If you are focusing on that because of the issues that we had with the PRA standards.
MR. KEVERN: Let me follow on with Tom's comment that when I first saw this identified by you folks I was, I had a concern that what you wanted was a laundry list of standards that we had not officially endorsed and that you were concerned about using or not using in future applications, and I thought well that's not going to, we really can't go there.
So, excellent, I see heads shaking. That's great. Note that please, head shaking. So when we were trying to put this together that I think if we could have something more generic in the way of guidance of how to deal with something in the future or how to deal with a topic in general that would be something we could do and if that's something that's of value to industry then that's excellent, we got a meeting of the minds and we can go forward.
MS. MROWCA: And if that's all this section is about it will be very short.
MS. ST. PETERS: Are there any other comments?

MR. HICKS: So that's something that we need to get back to them on?
MS. AUSTGEN: Yes, I think we'll go back and double check our notes, but I think it's probably primarily focused on that PRA standards piece.
MS. ST. PETERS: Yes, any further clarification or topics would be helpful. Like I said, I am working on this with Donnie Harrison, so we are waiting to kind of get started to get you all's feedback so we can make sure we go down the right path that's most useful for the staff and for industry.
Any other comments or questions?
MR. KEVERN: This is engendering less discussion than I expected, so I wasn't quite sure how we were going to do this. When we bring together the slides here it looked like there was not a lot of substance but it looked like it was based on not knowing exactly what industry had in mind.
MR. BELL: Well it seems like it's good you came back as you did before going too far and dust off some notes and see if there was more.
MR. KEVERN: Okay. So if I could give NEI an action there. So we come back to you on this topic, sort of vague, so you listed it as a vague topic to begin with, we're coming back less vague, but still vague, and so if you'd like some, if you'd give us some clarification of what you'd like to see us do going forward we would appreciate it.
MS. ST. PETERS: Yes.
MR. KEVERN: All right, thank you. Anything else, Lynn, you'd like to say on this subject?
MS. MROWCA: No. Sounds good from here. I'm thinking Courtney might --
MR. KEVERN: Anyone else on the phone that has questions, comments?
(No audible response.)
MR. KEVERN: Okay, well that was quicker than I thought we would cover that topic, so let's move on to Summary and Review. Let me go to the last slide I had in the package, the backup slide, and just use this as a memory jogger back to the topic we first started with where I said we were wrestling with the scope and the number of topics and the organization, structure, level of detail, and specifically the information regarding the technical content of the safety analysis report.
So this is the short presentation Kim gave and this is just a reminder of, for applications of any flavor, 50 or 52 that there are requirements to do an evaluation against the standard review plan.
This is not new for anyone that's an applicant or in industry, but let me use this as just a tool to go back to the discussion of whether anything else that anyone wants to say about the way we are currently proposing to go forward on the revision to Reg Guide 1.206.
MS. MORGAN-BUTLER: And I didn't mention before in the discussion about some of the considerations we made when we were looking at the scope, so I just want to briefly touch on some of those things.

First we wanted to look at the purpose of the Reg Guide itself, you know, as a broad scope guidance for Part 52 applicants, and so we wanted to consider exactly how broad we wanted it to, or that we thought that it needed to be or it needs to be.

And in that consideration we also had to think of the audience and that's where we are having a hard time getting our hands around the exact audience for it at this point.

We know that the experienced applicants may not rely on it as much as the inexperienced applicants, and we haven't heard much from the inexperienced applicants, but there is a, you know, that may be because they don't know the questions to ask, so we're not sure about that at this point.

But that's the type of information that we would, you know, welcome feedback on, and these are just considerations, and feedback on any of these considerations will be very helpful to us.

We also wanted to look at in determining the scope, you know, in the Project Aim environment that we are in, and not just Project Aim, just the regulatory environment, we had to look at the priority of the project and that affects the pace of it and the resource burdens.

And so as you could imagine back in 2007 our resource level was much higher related to this type of guidance and at this point the resource levels are not exactly the same. That's not an excuse, but it's just a reality of our situation here.

It was a very high priority. Generating the guidance was a very, very high priority in 2007, and you could imagine why, and we did have the resources there.

And so there are some pros and cons to the way that we decided to move forward and so I just wanted to mention some of the pros as we see them now and then if you want to add any to either side that will be great information for us.

The simplicity of it having a document where we have the -- Well, we have a document, 0800, that has the technical information and another document that has the regulatory information.

And then it actually precludes the guidance duplications and inconsistencies, having the information in two places, I had mentioned that before and I mentioned resources.

And then the cons are that we, the applicants would have to rely on 0800 and that was mentioned before for the technical information and the documents are not written exactly the same, so we have to, that was earlier, and we are considering that and then the staff burden for ensuring clarity of both of the documents.

And then Mark Notich mentioned that we have to look forward and consider where it could be in 0800 and we could actually consider whether it could be an appendix, you know, some of the information could be put in an appendix to 0800, so we're looking in that way.

And just looking at the project in general we just want to make sure that it's user friendly, you know. If we

have these two documents we want to ensure that they are not introducing more confusion.
And so a con was that it may not have been, at least not 0800 and Reg Guide 1.206 may not have been as user friendly as we wanted them to be and we are trying to make them more user friendly.
So if that's just -- I am just, you know, going back to make sure that I stated some of those things so that if you have areas of feedback in terms of the scope, because the question was asked whether this is our plan moving forward and it is.
We have management approval to move in this direction, but, of course, our process, our regulatory processes here at the NRC, we are always open to feedback and stakeholder interaction and that information does give us some data points in terms of our path forward.
And so as this revision moves forward we think the way that we have it written here it would take about a year to complete, a year or two. If we had to, if we looked at the larger scope where we had all the technical information in the Reg Guide it would be multiple years and the pace over time, just because of the resources it would take us much longer.
And that's not necessarily a con because it just, it all plays into when we expect more applications, but it was a consideration, so I wanted to mention that.
MR. KEVERN: Okay. As a follow-on to Kim's discussion if we go back to the slide where it says this is what we have at the present time for contents of Regulatory Guide Revision 1.206.
All of Section C.1 we discussed in previous meetings and that is currently packaged in a Federal Register Notice, being reviewed by our Office of General Counsel, and expected to be issued here in the reasonably near term.
Of the C.2 topics we have the 18 that have been pretty constant now for the last six months. Five of those topics were addressed today. Four of those are in draft guidance that we're ready to move forward with incorporating or at least addressing, if not verbatim addressing, incorporating your comments today.
We've got the topic we just covered, which is sort of in its infancy I would say, and then five of the other topics have been addressed previously. Three of those were in draft guidance that we need to incorporate comments to move forward for issuance in a Federal Register notice.
And two of the topics were similar to the consensus standards that was on acceptance review and RAIs and, again, those are two topics where we're back to the drawing board trying to figure out exactly how we can put together guidance that addresses your needs as well as ours, and I don't have any answer to that today. That will be in a future meeting.
And the other topics are somewhat a work in progress. A couple of them have yet to be started, a couple of them are just reasonably straightforward revisions and updates to the 2007 version.
So that's the package as we currently see it. Now

reinforcing what, I guess what Kim said, you know, this is sort of in the eye of the beholder. So for experienced applicants you look at this laundry list of 18 topics and they say oh, yes, I know what each one of those are or I may be off the mark a little bit because the staff always looks at things a little differently than industry, yes, I know what all that is.

An inexperienced applicant would look at that and it would look like truly a laundry list, just a random list of words all stuck together, it doesn't make a lot of sense.

So we've struggled with this, I've struggled with this, we've all struggled with this for a while now, a year and a half or so, in trying to hit what I call the target audience and we don't know what that is.

So as Kim mentioned, you know, the questions that they were trying to hit for new applicants they don't know what questions to ask so we can't answer the questions they don't know how to ask.

So I said okay, we're stuck with you folks that have experience. Well then you don't have the same questions, and so it's a mixed bag. So we can make decisions but we're not sure it's the right decision. So in the absence of any kind of feedback we'll just move forward the way we think is best, but we would appreciate some feedback so we can have a little bit more meaningful document to take them -- It'll be a decade by the time we get this thing out from the time it was issued before and so it may be another decade for the next time.

We'd like to have something that looks worthwhile that's usable for the next period of time. So that's our objective and we need help doing it. So with that --

MR. BELL: Tom, can you remind me what --

MR. KEVERN: Yes, sir.

MR. BELL: -- Section D is on implementation? Forgive me.

MR. KEVERN: I'm sorry?

MR. BELL: The last section is D after all the C's.

MR. KEVERN: Oh, D.

MR. BELL: It's on implementation. Remind me --

MR. KEVERN: That is the administrative section required the way we package a regulatory guide that says how the standard is going to be implemented and you'll see it in the Federal Register Notice that comes out and it essentially says do it the way it should be done.

MR. BELL: Standard section?

MR. KEVERN: Yes. In other words, yes, it's the, it's not violating any government accountability act or whatever else and it just --

MR. BELL: Paperwork reduction and --

MR. KEVERN: Yes, paperwork reduction. Thank you, paperwork reduction, and this is intended to be guidance and it's not mandatory, so we're going to suggest new business.

MR. BELL: Okay.

MR. KEVERN: It's the boilerplate, regulatory language. I should know the answer to that better. I actually read a lot --

MR. BELL: None of us can. I wasn't prepared for it, sorry.
While they're thinking about what to say of substance, I guess I just, I appreciate you sharing the staff's decision on this and inviting our feedback.
As I understand it, I mean we've got a Reg Guide with a lot of technical information in it. It's mostly out of date, I think those were your words.
MR. KEVERN: Some of it, not all of it, some of it.
MR. BELL: And as Theresa pointed out and Tom, I mean in some cases the SRP is light in terms of what might be useful to an applicant. In other sections the SRP may have more information, according to Theresa, you know.
MR. KEVERN: Right.
MR. BELL: And so the staff had a mixed bag. I suspect that we might argue that the Reg Guide calls for a lot of technical information that the industry may not even feel is necessary for you to use the SRP and make your safety findings.
So I wouldn't want to suggest that it's a cut and paste, you know, of what we have today and whether to make it an appendix to the SRP.
MR. KEVERN: Right.
MR. BELL: Having said that, if we can agree on that now you're into the resources it would take to identify what's useful and find a way to preserve it.
I would hope and expect that if we had bright ideas on that that you would be open to hearing on it and maybe provide an opportunity at a future meeting to share your ideas on how this integration or morphing, that's not the word I wanted, but might occur and then we could bring, you know, whatever ideas we had.
But did you guys come up with the answer while you were kibitzing over there. I was trying to, buying it some time.
MS. AUSTGEN: I don't know what they are kibitzing about, but what I've been waiting to say is that --
MR. BELL: Go ahead.
MS. AUSTGEN: -- I think this approach sounds good and we can support it. We really just want to come out on the other end of this with some specific guidance that's maintained current and not contradictory and incorporating things into the SRP as far as the technical information sounds like a good way to go.
We've seen that you guys have been maintaining the SRP sections individually. We think it would be useful to have kind of all of the information in one place or clearly connected.
And so if it's easiest to say well the SRP already contains the staff's review criteria, acceptance criteria, we just need to add a little bit more to say what that means so that the applicants can provide quality applications and perhaps even more consistent applications then we certainly think that's a great way to achieve the efficiencies that we are all looking for.
MR. KEVERN: Okay.
MS. MORGAN-BUTLER: And we have to consider the Part 50

applicants as well.
MS. AUSTGEN: Yes.
MS. MORGAN-BUTLER: And changes to Part 52 in our Reg Guide, how would that impact Part 50 and the way that they are doing business, so we're thinking about it globally.
We don't have the answers yet, but we're thinking about it globally.
MS. AUSTGEN: Sure.
MR. HICKS: What we were just talking about was you had said that C.1 was coming out in a Federal Register and we had provided comments on that, on those sections in previous meetings, but never saw anything come back. I guess this is --
MR. KEVERN: I'm sorry, no --
MR. HICKS: Well I don't think, we ever saw another revision since we provided the comments, right? This is the opportunity then to look at those.
MR. KEVERN: Correct.
MR. HICKS: Okay.
MR. KEVERN: Yes, it's going through the normal, formal regulatory guide creation process. And so we had informal public meetings on it and we had a discussion on all this, we solicited comments, you gave those comments, some of them were in writing, some were verbal.
So now we've incorporated some of those, we think we've got what we should have in there incorporating some of your comments verbatim, ignoring others, but, anyway, we're somewhere in between there.
And this will come out in a Federal Register Notice. It'll be for a formal review. It'll be, I think it's a 60-day review process, so it's just following the normal regulatory process.
MR. HICKS: Yes.
MR. KEVERN: If we have not incorporated or addressed your comments as you think appropriate then we'll expect a written comment back.
MS. MORGAN-BUTLER: And down the road we'll do the same thing for the C.2 sections.
MR. BELL: Maybe back on the SRP just for a second, it's an ongoing update process, sections keep coming out, I was just talking with Mark about it.
Now I don't know what's coming up next or soon, but I bet you do, and, you know, we collectively perhaps could use one of these upcoming SRP update opportunities to consider this additional factor that this may be it in terms of regulatory guidance for applicants in the future.
MR. KEVERN: Yes.
MR. BELL: And once you say that, you know, we can all ask ourselves is that enough. I think Kati just -- The overarching point is that everybody wants to be able to provide high quality complete applications.
We've got, you know, one could argue that this could take us and it would make that task more difficult, that's not going to be good. But I don't know about the notion of using, it could be random, it could be a smart

selection of an upcoming SRP section that we know is light on guidance for an applicant.
But perhaps taking something concrete and trying to work with it and, you know, is it, or is it sub-bullets where there are already existing bullets, is it an appendix to a section. I don't know, but that's a thought.
MR. KEVERN: Well as I mentioned earlier this is somewhat new news to the staff, too. We just got the decision last week and so this is a timely meeting. Well one of the items we could solicit and if NEI would like to give us written feedback on that, you know, we've got a formal process, and I don't want to steal Mark's thunder, but we got a formal process for it that includes public comment on revising the standard review plan, also, not as formal as the regulatory guide process but it is a public process, but we did not have a public meeting.
So one option would be to air the next Reg Guide 1.206 public meeting, we need to address that topic solely and it's like okay, here we've got all these different topics and if we all know that 300, or whatever number of sections there are in standard review plan, they're all, none of them are created equal and we say the same thing about the current version of Reg Guide 1.206 and say why we all have the same goal, but what's the right way to do this or how do we prioritize with a finite number of resources.
That's something we can do, and ask at the Reg Guide 1.206 public meeting if there is an interest. But we haven't gotten that far so I'm not going to propose that from a status point of view because we're still just starting to think about it.
But if that's something that you folks think would be worthwhile why then suggest that to us and --
MR. BELL: Well you can think about it a week longer than we have.
MR. KEVERN: Okay, so --
MR. BELL: Right?
MR. KEVERN: So we all agree that it's a big question mark on the table. We all have the same goal to make this work and if you get some, think about some things over the next week or two and, as we do also, and decide what the best way is to go forward on this.
MR. HICKS: No, but I think Russ's suggestion though of a test case, SRP section would be helpful.
MR. BELL: Yes.
MR. KEVERN: Okay.
MR. HICKS: So we all know where we're going.
MR. KEVERN: All right.
MR. BELL: So that's one idea. Let's take back what we've heard, I appreciate understanding the objectives and the pros and the cons and the considerations that went in there, and then as Tom said come back with some ideas on maybe an app use at the next meeting like this.
MR. NOTICH: We put out 53 SRP updates last year. The vast majority of those were draft, so we'll be expecting, and I have, you know, and I know when the comment period closes on all those and it's going to

start closing.
Yesterday one closed and from now through December I think we're going to be, there is going to be various, you know, SRP sections, the comment periods are going to be closing.
So, you know, give us comments, you know, on, again, you know, where some of this stuff that today we talked about might fit in, you know, that would be a tremendous help, you know, and that could, you know, jumpstart the audit process.
MR. HICKS: Are you saying to actually make a comment on one of these ones that's already out there --
MR. NOTICH: As a draft.
MR. HICKS: -- to actually incorporate the 1.206, what we think might be a 1.206 equivalent, the information into it, yes?
MR. NOTICH: Yes. You can make any kind of comment that you -- I'm sorry.
MS. MORGAN-BUTLER: Oh. Well maybe we should look at the ones that are out for comment and see if there is any of them that have --
MR. NOTICH: Oh, yes. Yes.
MS. MORGAN-BUTLER: -- a significant amount of technical update.
MR. NOTICH: Right. Yes, we can look at it, but so can industry also can look at it and see if we --
MS. MORGAN-BUTLER: Yes, yes, and tech case.
MR. NOTICH: Right.
MS. MORGAN-BUTLER: We can help them --
MR. NOTICH: Right.
MS. MORGAN-BUTLER: We can work together to identify a test case.
MR. NOTICH: Right, yes. Yes, and I'm just saying, you know, that there is an opportunity out there for you guys to comment on that, you know, give us some audit feedback.
MS. MORGAN-BUTLER: Because all of them weren't updated with the --
MR. NOTICH: No.
MS. MORGAN-BUTLER: -- you know, just for the specific use of including more technical information or more guided information, so we would have to identify one or two of them that --
(Simultaneous speaking.)
MR. BELL: If it's difficult to, you know, catch one of these while they are in progress right now, as a follow-up to this meeting do you think you could give us a picture of 2016 and the schedule for what might be coming out and when?
That might be, allow us to take a more orderly approach to the --
MR. NOTICH: Well, I mean, you know, I can tell you know that a good number of the SRP sections that we are scheduling for 2016 are going to be finalizing the ones that we put out as draft in 2015, in Fiscal Year 15, okay. Like there were 33 for Chapter 7 and other chapters had multiple SRP sections. So, again, you know, we put out 53, I'd say probably at least 40 to 45 of those were

draft. So, you know, there's your opportunity.
MR. KEVERN: Yes, I guess I'd be asking about the draft, new drafts.
MR. NOTICH: Oh. New drafts, well within the next couple of weeks is going to be finalizing our schedule, you know. I don't know, I'd have to talk with Kim and OGC to see if that's information that is public.
MS. MORGAN-BUTLER: Yes.
MR. NOTICH: But, you know --
MS. MORGAN-BUTLER: We may be able to choose one of the sections that were updated that we're not necessarily adding to the Reg Guide now and try to do the work on the front end of incorporating it into the SRP within the next few months and then, you said, as a test case.
MR. KEVERN: Right.
MS. MORGAN-BUTLER: Because we have some sections that are completed.
MR. KEVERN: Right.
MR. NOTICH: And remember the SRP sections really belong to the technical section, or the technical branch. They're the ones who wrote them, they're the ones that will use them, you know.
I am just a transfer point, you know, getting them all together and then getting them through the final stage, you know.
You know, I can look at them, you know, to make sure that what is agreed upon between all of us is in them, but, you know, your focus should be on the actual technical branches, you know, those people, you know, making sure that that proper information is included before it gets to me.
I am not an expert on everything in the SARs, those people are.
MS. MORGAN-BUTLER: Well we're going to facilitate that.
MR. NOTICH: Oh my.
MS. MORGAN-BUTLER: Yes, we have some, we have the technical experts that are working with us as project managers.
MR. NOTICH: Okay. Oh, I thought that you were going to train me in --
(Simultaneous speaking.)
MS. MORGAN-BUTLER: No, no. No, so we'll facilitate that and figure it out.
MR. NOTICH: Right.
MR. KEVERN: Okay. So I guess that obviously is a topic of interest to all of us here. Anything else before we end today's exciting session?
(No audible response.)
MR. KEVERN: Great, okay. The meeting is adjourned. Thank you, folks.
MR. NOTICH: Thank you.
MR. KEVERN: On the phone, we are completed for the day.
(Whereupon, the above-entitled matter went off the record at 4:16 p.m.)

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