

Nuclear Energy Institute Discussion Slides

Teleconference with NRC on
Environmental Review for Subsequent
License Renewal
September 19, 2016

Ecological Studies to support NRC consultation with other agencies

Issue: “Last minute” delays in issuance by NRC of final License Renewals have occurred due to ecological studies required by other agencies.

Background:

- Sampling requirements for protected species may be ongoing due to permits or other approvals not related to License Renewal
- During Draft SEIS review, the jurisdictional agency may recommend augmented or additional sampling during NEPA consultation
- NRC may delay issuance of final license renewal to await sampling results

Possible Actions:

- Begin NEPA consultation early, such as at the time of sufficiency determination
- Accelerate NRC Staff reviews for resource areas requiring NEPA consultation with other agencies
- Establish criteria for judging in advance whether NRC must review results from ongoing sampling activities before finalizing the SEIS

Expectations for “Incorporation by Reference” in an Environmental Report

Issue: The extent to which an Applicant’s Subsequent License Renewal (SLR) ER must stand alone or may incorporate information by reference from first LR (or other pertinent) environmental review documents is unclear

Background:

- In LR Supplemental EISs, NRC incorporates information from NUREG-1437 (Generic EIS for License Renewal) by reference
- Industry would like to use a similar approach in SLR ERs

Possible Actions:

- Applicant’s ER could summarize conclusions from first LR environmental review documents
- Applicant’s ER could incorporate source information by reference
- Applicant’s ER could include dynamic links to first LR environmental review documents

Pre-application discussions with applicant on environmental topics

Issue: The value of pre-application discussions is unclear.

Background: Pre-application discussions can be used to:

- Clarify existence of “new” information in the context of SLR and how to assess its significance
- Avert issues of SLR ER insufficiency
- Inform NRC Staff and improve SLR ER review efficiency
- Aid in SLR Supplemental EIS scoping

Possible Actions:

- Hold SLR pre-application meetings on environmental topics based on case-specific considerations

Defining reasonable alternatives to the proposed action in SLR Environmental Reports and SEISs

Issue: The process for defining reasonable replacement power alternatives in SLR ERs and SEISs may be inefficient

Background:

- In states with regulated utility markets, utilities prepare Integrated Resource Plans (IRPs)
- in deregulated electricity markets, Regional Transmission Organizations (RTOs) prepare similar plans
- Such documents consider all available resources for meeting future electricity demand

Possible Actions:

- Limit “reasonable” replacement power alternatives to:
 - Fuel resources identified in IRPs or RTO plans
 - Alternatives not previously considered in the first LR environmental review
 - Alternatives shown to be currently economically viable