

**RE-010 Working Group Meeting  
Consolidated and Coordinated  
LAR Review Processes**

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**February 8, 2017**

# **Agenda**

- Introduction
- Objective
- LAR Types
- LAR Preparation Improvements
- NRC Review Processes
- Multi-Licensee Consolidated
- Industry Coordinated
- Summary and Conclusions

## **Introduction**

- The PWROG and BWROG are supporting the industry initiative, "Delivering the Nuclear Promise"
- The Owners Groups (OGs) are working to expand the use of shared industry resources for regulatory activities.
- The OGs want to leverage the successful TSTF traveler process to make License Amendment Requests (LARs) to adopt travelers more efficient to prepare and for the NRC to review.

## **Objective**

**Discuss a Multi-Licensee  
Consolidated Pilot Submittal**

## LAR Types

- Type 1 – Plant-Specific
  - Plant Specific LAR Process
- Type 2 – Generic Change with a model application that requires submittal of technical, plant-specific information
  - Best candidate for Industry Coordinated LAR Process
- Type 3 – Generic Change with a model application that does not require significant/any plant-specific information other than choosing the appropriate plant specific options provided in the model application
  - Best candidate for Industry Consolidated LAR Process

## LAR Preparation Improvements

- **NEI 06-02**, "License Amendment Request Guidelines," Revision 5 was published on January 7, 2017.
  - revised to describe an industry-standard LAR process, from inception to implementation.
  - Captures industry best practices
  - Includes an improved model application format for plant-specific changes (Type 1 LARs)
  - Provides guidance on acceptable variations on approved travelers

## NRC Review Processes

### Plant Specific

- The current plant-specific LAR process, in which an individual licensee submits a LAR to the NRC and the NRC reviews the application.

### Industry Coordinated

- A group of licensees and the NRC coordinate the submittal and review of LARs to adopt the same NRC-accepted generic change

### Multi-Licensee Consolidated

- A review process in which a single LAR is submitted by a group of licensees to adopt an NRC-approved generic change

## **Multi-Licensee Consolidated**

### **Overview**

- A review process in which a single LAR is submitted by a group of licensees to adopt an NRC-approved generic change
- Similar to a fleet submittal except it includes more than one licensee (use of current NRC process for fleet submittals)
- Intended for LARs that have an NRC accepted model application and require no plant specific technical information (i.e., Type 3 LAR)



## **Multi-Licensee Consolidated**

### **LAR Content**

- The submittal would consist of a cover letter based on the NRC accepted model application, and attachments for each plant containing:
  - the authorized licensee signature
  - a description of any variations from the approved model
  - the TS and Bases markups
  - TS clean-typed pages

## Multi-Licensee Consolidated

### Suggested Traveler

- TSTF-545, “TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing.” This traveler:
  - Adds a Definition of INSERVICE TESTING PROGRAM in section 1.1
  - Changes instances of “Inservice Testing Program” in SRs to “INSERVICE TESTING PROGRAM” to reference the definition.
  - Removes the Inservice Testing Program from TS Section 5
  - Associated Bases changes
- Why good candidate?
  - No plant-specific information; only differences should be numbering

## Multi-Licensee Consolidated

### Challenges/Discussion

- How would billing fee work?
- Would OMB clearances be needed each time an RAI is issued (i.e. 10 or more licensees)?
- Possibility that issuance of the amendment may be subject to OMB review under the Congressional Review Act.
- Why the TSTF process can not be used as is (what problem are we trying to solve?)

## Multi-Licensee Consolidated

### Challenges/Discussion

- What low hanging fruit is still out there that is simple enough for the new process (how many changes would fit in this new process such that it makes sense for NRC to establish new procedures)? Give specific example of what change might be considered for this process.
- How would applications submitted in this process be prioritized compared to everything else NRR is reviewing?

## **Multi-Licensee Consolidated**

### **Challenges/Discussion**

- Issuance of Safety Evaluations
- Communication between NRC/Licensee/  
Sponsoring Organization

**Pressurized Water Reactor Owners Group (PWROG)  
Boiling Water Reactor Owners' Group (BWROG)**

# **DISCUSSION**

## **Industry Coordinated**

### **Overview**

- A group of licensees and the NRC coordinate the submittal and review of LARs to adopt the same NRC-accepted generic change
- Negotiated submittal schedule and requested approval dates
- Industry ensures the LARs have similar content and format and avoid unnecessary deviations.
- Efficiency is gained by utilizing the same NRC staff for all the reviews.

## **Industry Coordinated**

### **Suggested Traveler**

- TSTF-542 "Reactor Pressure Vessel Water Inventory Control"
  - The industry plans to use the Industry Coordinated review process in 2017.
  - TSTF-542 is a Type 2 LAR (model application, plant specific technical information is required)



## **Industry Coordinated**

### **Challenges**

- Industry/NRC development of a submittal schedule that balances licensee's desired schedules with NRC resources.
- Industry will need to monitor the submittal schedule and work with NRC to address changes in plan
- Sponsoring organization (TSTF, OG, NEI, etc.) generic consideration of RAIs
- Communication between NRC/Licensee/Sponsoring Organization if dates will not be met.

**Pressurized Water Reactor Owners Group (PWROG)  
Boiling Water Reactor Owners' Group (BWROG)**

**DISCUSSION**

## Summary and Conclusions

- New process for the industry; same process for the NRC (extension of fleet submittal concept)
- Efficient use of both NRC and Licensee resources
- Sponsoring/Coordinating Group oversight will ensure a more standardized and consistent submittal
- Expansion of already successful TSTF process
- Next Step: Submit Multi-License Pilot LAR

**Pressurized Water Reactor Owners Group (PWROG)  
Boiling Water Reactor Owners' Group (BWROG)**

**QUESTIONS**