

**PAMELA B. COWAN**  
*Vice President, Nuclear Generation*

1201 F Street, NW, Suite 1100  
Washington, DC 20004  
P: 202.739.8093  
pbc@nei.org  
nei.org



January 27, 2017

Ms. Vonna L. Ordaz  
Acting Director  
Office of New Reactors  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Part 52 Licensing Lessons Learned

**Project Number: 689**

Dear Ms. Ordaz:

It is vitally important to the future of our industry that the licensing process for new nuclear plants be as efficient, effective, timely and predictable as possible to encourage future applicants to bring forward innovative designs, while continuing to assure public health and safety. As indicated in the NRC's Vision and Strategy document for non-light water reactors, we appreciate that the NRC shares the goal of efficient, effective new reactor licensing. With that objective in mind, the purpose of this letter is to provide the results of a recent industry workshop on lessons learned from new plant licensing experience, and to request NRC support for actions to improve new reactor licensing efficiency and reduce regulatory impact on the time-to-market for future new plant applicants. We recognize that the NRC has performed its own lessons-learned evaluations and implemented improvements to both the licensing process and post-licensing implementation. The results of these NRC efforts were considered as inputs to the industry workshop discussions.

We support the NRC's efforts to develop and implement regulatory changes in this area. The time is right for the NRC and the industry to take action to address new plant licensing lessons learned, while recent and ongoing licensing experience is fresh, and key industry and NRC staff are available for the task. Near term improvements to NRC's licensing process and guidance would clearly benefit the next wave of applicants and NRC reviewers, and will complement other forward-looking activities the NRC has underway, including development of guidance for staged licensing and non-LWRs.

NRC senior management and Commission support will be needed to improve licensing efficiency, effectiveness, timeliness and predictability. Most of the improvements targeted can be accomplished through new or revised NRC guidance, i.e., without rulemaking, and ongoing activities can be leveraged to achieve desired outcomes in key areas. The needed improvements most frequently cited by attendees at the industry licensing lessons learned workshop were:

1. Stemming the growth in application scope and level of detail and clarifying the threshold for information necessary to support required NRC safety findings;
2. Clarifying of NRC's application acceptance review process, application docketing criteria, and the integration of pre-application interactions with NRC staff safety reviews;
3. Simplifying the Part 52 change process by eliminating Tier 2\*;
4. Establishing Tier 1/ITAAC First Principles and developing standardized ITAAC; and
5. Avoiding undue combined license delays when the need for changes in a completed design certification is identified

Addressing these issues will enable demonstrable improvements in licensing efficiency, effectiveness and predictability, and position the industry and NRC for the future. The industry looks forward to working with the NRC staff and stakeholders to achieve these improvements. The attachment to this letter provides additional discussion of these key lessons learned, and associated recommendations for improving licensing efficiency and predictability going forward.

We will follow up with you and your staff concerning implementation of licensing lessons learned activities. Please contact me or Russ Bell (202.739.8087; [rjb@nei.org](mailto:rjb@nei.org)) if you have any questions.

Sincerely,



Pamela B. Cowan

Attachment

c: Mr. Michael E. Mayfield, NRO/DEIA, NRC  
Mr. Michael C. Cheok, NRO/DCIP, NRC  
Mr. Frank M. Akstulewicz, NRO/DNRL, NRC  
NRC Document Control Desk