



LICENSE AMENDMENTS

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OBJECTIVE

- **Fundamentals of the License Process**
- **License Conditions**
- **Timing associated with the amendment review**
- **Overview of the Safety Evaluation**



Licensing Process





THE LICENSE

- **License Requirements**
- **License Conditions**
- **Technical specifications**
- **Environmental Protection Plan**



LICENSE CONDITIONS

- Contained within the body of the license
- Included as part of the amendment
 - Implementation Requirements
 - Technical Specifications
 - Environmental Protection Plan
- Language for a license condition can be submitted by the licensee in the form of a commitment



LICENSE CONDITION EXAMPLES

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 222, are hereby incorporated in the renewed operating license. The licensee shall operate the facility in accordance with the Technical Specifications.

Implementation Date

This license amendment is effective as of the date of its issuance and shall be implemented within 90 days.

Subject to conditions

2.B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses:



ACCEPTANCE REVIEWS

- Determine whether a requested licensing action is sufficient and acceptable for docketing.
- Determine if enough technical information has been provided for the NRC staff to make an independent assessment to complete its detailed technical review.
- NRC staff reduce unnecessary delays in the review of requested licensing actions.
- Goal to complete review within 25 working days.
- Does not apply to emergency or exigent license amendment requests.
- May return an insufficient application to address any identified insufficiencies.



ROUTINE REVIEW

- Normally a year for amendment reviews
- 99+ plants NRC staff regulate
- Submittal
 - Quality
 - Complexity
 - Uniqueness
- Licensee responsiveness
- Commission priorities
- External stakeholder interactions
 - Public
 - Industry
- Other licensing tasks



SHORT TURNAROUND

- Only amendments require public noticing
- Determination of emergency/exigency at the discretion of the NRC staff
- Must demonstrate:
 - Why condition could not have been avoided for exigency
 - That the licensee did not create the emergency by failing to act
- Submittals should be as complete as possible in both scope and depth
 - Explicitly identify requested change



SAFETY EVALUATIONS

- Provides the technical, safety, and legal basis for the NRC's decision regarding a license amendment request.
- Provides sufficient information to explain the NRC staff's rationale to someone unfamiliar with the licensee's request.
- Includes a brief description of the proposed change, the regulatory requirements related to the issue, and an evaluation that explains why the NRC staff's disposition of the request satisfies the regulatory requirements.



SAFETY EVALUATIONS CON'T

- The information supplied by the licensee must be docketed and under oath or affirmation because it is relied upon in the safety evaluation.
- NRC staff safety evaluations are normally not part of a plant's licensing basis.
- Licensees provide the technical bases information so that there is no confusion following the licensing action and to avoid a perception of staff-imposed backfits.



QUESTIONS





EXTERNAL STAKEHOLDER INTERACTION



OBJECTIVE

- **Documentation**
- **Public Meetings**
- **Pre-submittal Meetings**
- **Request for Additional Information (RAIs)**
- **Notice of Enforcement Discretion (NOED)**



DOCUMENTATION

	Routine Amendment	Emergency Amendment	Exigent Amendment	Relief Request	Verbal Relief Request	Exemption
Acceptance Letter(s)	X			X		X
Notice of Consideration of Issuance; Opportunity for a Hearing (Sholly)	X	X				
Request for Additional Information (RAI)	X	X	X	X	X	X
Environmental Assessment (EA)/ Impact Statement (EIS)	X					X
Safety Evaluation	X	X	X	X	X	
Amendment	X	X	X			
Notice of Issuance	X	X	X			
Exemption						X



Public Meetings

- Opportunity for the public to participate in the agency's decision-making process.
- Notified through the Federal Register, press releases, and local advertisements that an application has been received.
- Discusses technical issues or gather information that may lead to specific regulatory decisions or actions.



Public Meetings con't

- **Closed meeting takes place if:**
 - Contains classified information,
 - Contains proprietary information,
 - Invades personal privacy,
 - Related to investigation or enforcement,



PRE-SUBMITTAL MEETINGS

- **Ensure that information is fully and accurately understood and described.**
- **Preparation to provide a timely review once application is submitted.**
- **Discuss technical justification of proposed changes.**
- **Assist with determination of whether the NRC staff will need to prepare documentation to inform the Commission of the proposed action.**



REQUEST FOR ADDITIONAL INFORMATION (RAI)

- Regulation 10 CFR 2.102 allows the NRC staff to request the applicant to supply additional information.
- If an applicant fails to respond to an RAI in the requested time frame, 10 CFR 2.108 allows the NRC staff to deny an application.
- Typical time frame is within thirty (30) days from the date of the request, or within such other time as may be specified.



NOTICE OF ENFORCEMENT DISCRETION (NOED)

- Enforcement discretion is applied occasionally when compliance with an NRC requirement would involve:
 - an unnecessary plant transient
 - startup delay
 - performance of testing or inspection
 - Inappropriate system realignment with the specific plant conditions.
- The NRC staff may choose not to enforce the applicable technical specification, technical safety requirement, or other license or certificate condition.



NOTICE OF ENFORCEMENT DISCRETION (NOED) CON'T

- Enforcement discretion may not be justified because the licensee:
 - Failed to take timely corrective action; or,
 - Repeatedly requested enforcement discretion for the same reason.
- Within 4 working days of oral granting of the licensee's NOED request, the licensee must submit a follow-up exigent license amendment request, unless the NRC staff agrees, in advance of granting the NOED, that a follow-up license amendment is not needed.
- NRC staff agreement that a follow-up amendment is not warranted is documented in the written NOED authorization.



QUESTIONS





ROLE OF A PROJECT MANGER



OBJECTIVE

- **Licensing Authority**
- **Knowledge Center for information management**
- **Stakeholder Interface**
- **Licensing Management**



PROJECT MANAGER





LICENSING AUTHORITY

- **Site's licensing and design basis.**
- **Prepares and manages the review and issuance of documents associated with the safety and regulation of operating power reactors:**
 - **License Amendments**
 - **Exemptions**
 - **Relief Requests**
 - **Safety Evaluations**



KNOWLEDGE CENTER

- **Knowledge of a plant's licensing basis supports the NRC's response to:**
 - **potentially significant events**
 - **generic safety issues**
 - **assessment of licensee performance.**
- **Necessary in responding to:**
 - **allegations**
 - **controlled and routine correspondence**
 - **generic communications**
 - **other requests for information from stakeholders.**



STAKEHOLDER INTERFACE

- **Primary licensing interface between NRC offices and licensees.**
- **Integrates information obtained from all sources and ensures the proper dissemination to the applicable internal/external stakeholder.**
- **Coordinates activities associated with licensing programs and access to operating sites.**



LICENSING MANAGEMENT

- **Must review and understand the efforts of others in highly specialized areas, developing comments and questions in regard to technical criteria and analyses,**
- **Lead technical discussions, formulate overall technical judgments, and write technical reports.**
- **Addresses Errors by determining how they occurred and determines whether it can be corrected by an amendment.**
- **Errors in technical specification that meet the description of SECY 96-238 may be corrected by a letter signed by the PM transmitting the corrected pages.**



QUESTIONS

