

# Public Meeting to Discuss Comment Responses on Draft ATF Project Plan

December 7, 2021  
10:00 am – 11:00 am

# Introductions and Meeting Logistics

## Welcome

- Bo Pham – Director, Division of Operating Reactor Licensing
- Joe Donoghue – Director, Division of Safety Systems

## Presenter

- Michael Wentzel – Lead ATF Project Manager

- Participants will be on mute until the presentation is complete.
- The NRC will call on those with their hands up one at a time to provide feedback.
- Today's meeting is an Observation meeting. The public will have an opportunity to participate prior to the end of the meeting.
- No regulatory decisions will be made at today's meeting.

\*To be included in the attendance list: [accident\\_tolerant\\_fuel@nrc.gov](mailto:accident_tolerant_fuel@nrc.gov)

# Purpose

- To discuss the NRC staff responses to comments received on the draft ATF Project Plan.

# ATF Project Plan, Version 1.2

- Designed to:
  - Describe staff's strategy to ensure readiness for ATF, higher burnup, and increased enrichment licensing actions
  - Increase regulatory stability and certainty
  - Enhance and optimize NRC review
- Version 1.2 Timeline
  - Update started in early 2021
  - Draft Version 1.2 issued July 8, 2021
  - Public meeting to discuss draft on July 22, 2021
  - NEI comment letter submitted August 5, 2021
  - Final Version 1.2 issued September 30, 2021

# Changes Between Draft and Final

- Editorial changes to enhance clarity
- Changes to address comments received
- Additional streamlining to improve focus
- Regulatory Framework Applicability Analysis (Appendix A) and the Licensing Pathway Diagrams (Appendix B) separated from the plan

# Comments on the Draft

- 41 unique comments received
  - 2 from July 22 public meeting (ML21208A152)
  - 39 included in August 5 letter (ML21221A130)
- NRC staff responses issued on November 19, 2021 (ML21314A531).

# Industry Comments

# General Comments and Responses

- Comment: NRC should thoroughly review and incorporate industry comments into this revision.
- Staff response: The NRC staff has fully considered the industry's comments and has made updates throughout the ATF Project Plan, as appropriate.



# General Comments and Responses (cont'd)

- Comment: NRC should prioritize efforts to generically evaluate environmental impacts
- Staff response: The NRC staff is developing a plan to perform a bounding analysis of the environmental impacts associated with the deployment of ATF technologies, the details of which will be made available to the public, once finalized.

# General Comments and Responses (cont'd)

- Comment: The Project Plan should be more responsive to the use of risk-informed applications.
- Staff response: The ATF Project Plan was revised to make clear that the NRC staff will continue to take a risk-informed approach to nuclear fuel licensing; however, the Project Plan is not intended to convey guidance on how to pursue risk-informed licensing of ATF-concept, higher burnup, and increased enrichment fuels. The NRC staff continues to encourage vendors and licensees considering a risk-informed approach to engage early with the staff to identify and resolve the relevant technical and policy issues.

# General Comments and Responses (cont'd)

- Comment: NRC should clarify its inclusion of doped pellets within Appendix A.
- Staff response: The NRC staff revised the Regulatory Framework Applicability Analysis table to clarify the inclusion of doped pellets, as appropriate. Although the NRC has previously licensed fuel with doped pellets, it is possible that the agency's current regulatory framework (i.e., guidance documents) may not be fully applicable to all future doped pellet concepts; therefore, the information in the doped pellets column will be retained.

# General Comments and Responses (cont'd)

- Comment: NRC should clearly indicate that the Project Plan is not regulatory guidance
- Staff response: The NRC staff agrees that the ATF Project Plan is not intended to convey regulatory requirements or guidance. The NRC staff clarified that the ATF Project Plan and the Regulatory Framework Applicability Analysis table should not be interpreted as new regulatory requirements or guidance.

# Next Steps

# Next Steps

- Finalize Regulatory Framework Applicability Analysis and Licensing Pathway diagrams.
- Develop schedule-related communication to industry to help prioritize agency resources.
- Continue to look for opportunities to engage stakeholders.

# Planning Information Needed

## Hypothetical Licensing Timeline\*

	2022				2023				2024				2025			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Topical Report																
License Amendment Request(s)																

\* Nominal review times used for illustration purposes only.

- Licensing timeframes are dependent on vendor approach and plant-specific licensing bases.
- Staff would benefit from additional planning information to ensure that resources are focused appropriately. E.g.:
  - Number of licensees by fuel concept
  - Estimated submittal dates

# NRC/Industry Discussion



# Public Questions

For further information, please visit  
<https://www.nrc.gov/reactors/atf.html>