



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 1, 2023

MEMORANDUM TO: Michael I. Dudek, Chief
New Reactor Licensing Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

FROM: Thomas A. Hayden, Project Manager **/RA/**
New Reactor Licensing Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

SUBJECT: AUDIT PLAN FOR THE REGULATORY AUDIT OF NUSCALE
POWER, ON BEHALF OF CARBON FREE POWER PROJECT,
TOPICAL REPORTS ENTITLED "ON-SHIFT AND EMERGENCY
RESPONSE ORGANIZATION (ERO) STAFFING" AND
"EMERGENCY ACTION LEVELS (EALs)"

By email correspondence dated March 28, 2023¹, from NuScale LLC (NuScale) to NRC, NuScale has requested an NRC presubmittal engagement for the topical reports (TRs) entitled "On-Shift and Emergency Response Organization (ERO) Staffing," and "Emergency Action Levels (EALs)"

As a result of NuScale's request, the staff has proposed to initiate an audit of the ERO and EAL TRs to assess the needed information. The audit will take place at NRC headquarters via use of the NuScale electronic reading room (eRR). The audit entrance will be held on May 2, 2023, as mutually agreed. The additional contents of the audit plan are provided as an enclosure.

Docket No. 99902052

Enclosure:
Audit Plan

CONTACT: Thomas Hayden, NRR/DNRL
301-415-2956

¹ ADAMS Accession No. ML23121A110.

SUBJECT: AUDIT PLAN FOR THE REGULATORY AUDIT OF NUSCALE POWER, ON BEHALF OF CARBON FREE POWER PROJECT, TOPICAL REPORTS ENTITLED "ON-SHIFT AND EMERGENCY RESPONSE ORGANIZATION (ERO) STAFFING" AND "EMERGENCY ACTION LEVELS (EALs)" DATED: May 1, 2023

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ADAMS Accession No: ML23121A068

NRR-106

OFFICE	DNRL/NRLB:PM	DNRL/NLIB:LA	DNRL/NRLB:PM	DNRL/NRLB:BC
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DATE	05/01/23	05/01/23	05/01/23	05/01/23

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UNITED STATES NUCLEAR REGULATORY COMMISSION

AUDIT PLAN FOR THE REGULATORY AUDIT OF NUSCALE POWER, ON BEHALF OF CARBON FREE POWER PROJECT, TOPICAL REPORTS ENTITLED “ON-SHIFT AND EMERGENCY RESPONSE ORGANIZATION (ERO) STAFFING,” AND “EMERGENCY ACTION LEVELS (EALs)”

Docket No.: 99902052

AUDIT PLAN

APPLICANT: NuScale Power, LLC (NuScale) on behalf of Carbon Free Power Project

CONTACTS: Beth Dalick, Kyra Perkins, Lindsey Vance

DURATION: May 2, 2023 – May 9, 2023

LOCATION: **U.S. Nuclear Regulatory Commission (NRC) Headquarters
(via NuScale’s Electronic Reading Room (eRR))**
One White Flint North
11545 Rockville Pike
Rockville, Maryland 20852-2738

AUDIT TEAM: Don Johnson, Senior Emergency Preparedness Specialist, Office of Nuclear Security and Incident Response (NSIR)
Michael Norris, Senior Emergency Preparedness Specialist, Office of Nuclear Security and Incident Response (NSIR)
Other NRC technical reviewers as needed

I. BACKGROUND AND OBJECTIVES

By email correspondence dated March 28, 2023, from NuScale LLC (NuScale) to NRC, NuScale has requested an NRC presubmittal engagement for the topical reports (TRs) entitled “On-Shift and Emergency Response Organization (ERO) Staffing,” and “Emergency Action Levels (EALs)”

As a result of NuScale’s request, the staff has proposed to initiate an audit of the ERO and EAL TRs to assess the needed information. The audit will take place at NRC headquarters via use of the NuScale eRR. The audit entrance will be held on May 2, 2023, as mutually agreed. The focus and scope of the audit plan is as described below.

II. REGULATORY AUDIT BASIS

This regulatory audit is based on NuScale’s request to the NRC staff to perform a presubmittal assessment of the TRs before NuScale submits the TRs for NRC review. This assessment will help the staff determine whether there are any regulatory impediments or significant information gaps in the TRs that would impede a timely and/or efficient acceptance review.

III. REGULATORY AUDIT SCOPE

The audit team will perform a presubmittal assessment review of the TRs, as posted in the eRR. The objective of this review is for the staff to become familiar with the contents of the TRs and identify any policy issues and/or significant missing information that would challenge and/or impede the staff’s acceptance review of the TRs. These actions are intended to improve the effectiveness and efficiency of the TR process; as well as aiding in the regulatory clarity of the NRC processes as applicant submit first-of-a-kind proposals to the staff for evaluation.

IV. INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The NRC staff’s audit is limited to the review of the TRs that will be provided in the eRR before formal submittal onto the docket. The NRC staff will not request any additional information from NuScale beyond the posted TRs that NuScale will provide on its eRR.

V. SPECIAL REQUESTS

The NRC staff requests that NuScale provide subject matter expert(s), if necessary, to discuss the details of the audit material requested in Section IV of this audit plan.

VI. DELIVERABLES

As stated above, this Audit will be initiated on May 2, 2023.

The staff will hold audit calls and/or meetings with NuScale as necessary to understand the posted TR material.

The NRC staff will issue a report in accordance with Office Instruction LIC-111, “Regulatory Audits,”² within 60 days following the completion of the audit to summarize its observations. If

² ADAMS Accession No. ML19226A274.

necessary, any circumstances related to the conductance of the audit will be communicated to, Omid Tabatabai, at 301-415-6616 or omid.tabatabai@nrc.gov and Thomas Hayden, at 301-415-2956 or thomas.hayden@nrc.gov.