



1101 Market Street, Chattanooga, Tennessee 37402

NNP-23-003

August 17, 2023

10 CFR 50.12  
10 CFR 2.101(a)(5)

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-001

Clinch River Project  
NRC Docket No. 99902056

**Subject: Request for Exemption from Certain Requirements of 10 CFR 2.101(a)(5)**

In accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.12, "Specific Exemptions," Tennessee Valley Authority (TVA) requests an exemption from portions of 10 CFR 2.101, "Filing of an application." The requested exemption would provide for flexibility related to the sequence of the submittals of the Preliminary Safety Analysis Report (PSAR) and the Environmental Report (ER) associated with TVA's Construction Permit Application (CPA) to license a Small Modular Reactor (SMR) at the Clinch River Nuclear (CRN) Site. The exemption does not seek any relief from the technical requirements to be addressed by the CPA.

Specifically, TVA is requesting an exemption from that portion of paragraph (a)(5) which states, "[w]hichever part is filed first shall also include the fee required by §§ 50.30(e) and 170.21 of this chapter and the information required by §§ 50.33, 50.34(a)(1), or 52.79(a)(1), as applicable, and § 50.37 of this chapter." TVA intends to submit a CPA to license a SMR at the CRN Site in two parts, in accordance with the provisions of 10 CFR 2.101(a)(5). However, an exemption from this portion of 10 CFR 2.101(a)(5) would allow TVA to submit the ER required by 10 CFR 50.30(f) in the first part of the CPA, preceding the information required by 10 CFR 50.34(a)(1) (PSAR), which would be submitted in the second part of the CPA. Based on TVA's current schedule for the development of the PSAR and ER, TVA expects to be prepared to submit the ER to the U.S. Nuclear Regulatory Commission prior to the information required by 10 CFR 50.34(a)(1) (i.e., PSAR). Because 10 CFR 2.101(a)(5) requires that the information required by 10 CFR 50.34(a)(1) be submitted in "whichever part is filed first," the regulation, as currently written, would require TVA to submit the ER with the PSAR, thereby preventing TVA from utilizing the two-part submittal process outlined in 10 CFR 2.101(a)(5).

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**The requested exemption is permissible under 10 CFR 50.12 because it is authorized by law, will not present an undue risk to the public health and safety, is consistent with the common defense and security, and present special circumstances. More specifically, consistent with 10 CFR 50.12(a)(2)(ii), application of the portions of regulation from which the exemption is sought is not necessary to achieve the underlying purpose of the regulation.**

**The Enclosure to this submittal provides details regarding the requested exemption from the specific provisions of 10 CFR 2.101(a)(5) identified above.**

**TVA requests review and approval of the requested exemption by December 11, 2023 to support the development of a CPA for the CRN Site.**

**There are no new Regulatory Commitments associated with this submittal. Please address any questions regarding this request to Mr. Ray Schiele, Senior Manager, New Nuclear Licensing at [rjschiele@tva.gov](mailto:rjschiele@tva.gov).**

**Respectfully,**



**Scott W. Hunnewell  
Vice President, New Nuclear Program**

**Enclosure:**

**Request for Exemption from Certain Requirements of 10 CFR 2.101(a)(5)**

**cc (Enclosure):**

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## Request for Exemption from Certain Requirements of 10 CFR 2.101(a)(5)

### 1.0 Summary Description

In accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 12 (10 CFR 50.12), "Specific Exemptions," Tennessee Valley Authority (TVA) requests an exemption from portions of 10 CFR 2.101, "Filing of an application," paragraph (a)(5). The requested exemption would provide for flexibility related to the sequence of the submittal of the Preliminary Safety Analysis Report (PSAR) and the Environmental Report (ER) associated with TVA's Construction Permit Application (CPA) to license a Small Modular Reactor (SMR) at the Clinch River Nuclear (CRN) Site. The exemption does not seek any relief from the technical requirements to be addressed by the CPA.

Specifically, TVA requests an exemption from the portion of 10 CFR 2.101(a)(5) which states, "[w]hichever part is filed first shall also include the fee required by §§ 50.30(e) and 170.21 of this chapter and the information required by §§ 50.33, 50.34(a)(1), or 52.79(a)(1), as applicable, and § 50.37 of this chapter." TVA is requesting an exemption from the requirement of 10 CFR 2.101(a)(5) that the first part of its CPA to license a SMR at the CRN Site must include the description and safety assessment of the site (i.e., the PSAR required by 10 CFR 50.34(a)(1)). Based on TVA's current schedule for the development of the PSAR and ER, TVA expects to be prepared to submit the ER to the U.S. Nuclear Regulatory Commission (NRC) prior to the information required by 10 CFR 50.34(a)(1) (i.e., PSAR<sup>1</sup>). Because 10 CFR 2.101(a)(5) requires that the information required by 10 CFR 50.34(a)(1) be submitted in "whichever part is filed first," the regulation, as currently written, would require TVA to submit the ER with the PSAR, thereby preventing TVA from utilizing the two-part submittal process outlined in 10 CFR 2.101(a)(5).

TVA intends to submit a CPA for a SMR at the CRN Site in two parts, in accordance with the provisions of 10 CFR 2.101(a)(5). The requested exemption would allow TVA to submit the ER required by 10 CFR 50.30(f) in the first part of the CPA, preceding the information required by 10 CFR 50.34(a)(1) (PSAR), which would be submitted in the second part of the CPA.

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<sup>1</sup> 10 CFR 50.34(a)(1) requires compliance with paragraph (a)(1)(ii), which includes Subsections (a)(1)(ii)(A) through (a)(1)(ii)(E). 10 CFR 50.34(a)(1)(ii)(E) requires the applicant to submit information prescribed in paragraphs (a)(2) through (a)(8) and (a)(1)(i). 10 CFR 50.34(a)(1)(i) requires the applicant to submit information prescribed in paragraphs (a)(2) through (a)(8) with respect to operation at the projected initial power level.

10 CFR 50.34(a) has 13 subsections. Subsections (9) through (13) of the PSAR have not been invoked by the reference to 50.34(a)(1)(ii). Subsections (9) through (13) of the PSAR include the technical qualifications of the applicant, preliminary plans for coping with emergencies, issues related to construction at multiple unit sites, the earthquake engineering criteria in appendix S as partial compliance with GDC 2, and an aircraft impact assessment.

10 CFR 50.34(a)(1)(ii)(E) essentially flattens 10 CFR 50.34(a)(1) from two subsections to one subsection because (a)(1)(ii) eventually requires the applicant to submit the information required by (a)(1)(i).

10 CFR 50.34(a)(1)(i) duplicates the call in (ii)(E) to include the information required by (a)(2) through (a)(8).

## 2.0 Background

### Clinch River Nuclear Site Early Site Permit

On May 12, 2016, TVA submitted an application to the NRC for an Early Site Permit (ESP) at the CRN Site (Reference 1). On January 12, 2017, NRC staff determined that the application (with subsequent submittals) was sufficient for docketing and issued a *Federal Register* (82 FR 3812) notice notifying the public of the NRC's acceptance of the CRN Site ESP application (Reference 2). On December 15, 2017, TVA submitted Revision 1 of its ESP application, including Revision 1 of the Environmental Report (ER) to the NRC (Reference 3). By letter dated January 18, 2019, TVA submitted Revision 2 of the ESP application, which included Revision 2 of the Environmental Report (Reference 4). TVA's ESP Environmental Report was developed using the guidance provided in NRC's Regulatory Guide 4.2 (RG 4.2), "Preparation for Environmental Reports for Nuclear Power Stations," Revision 2.

NRC's development of the CRN ESP Environmental Impact Statement (EIS) involved review of TVA's Environmental Report, Site Safety Analysis Report (SSAR), and supplemental documentation associated with the ESP Application. The NRC review followed the guidance set forth in RG 4.2; NUREG-1555, "Environmental Standard Review Plan - Standard Review Plans for Environmental Reviews for Nuclear Power Plants;" NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants;" guidance provided in NRC Interim Staff Guidance COL/ESP-ISG-26, "Interim Staff Guidance on Environmental Issues Associated with New Reactors;" NRC Interim Staff Guidance COL/ESP-ISG-27, "Interim Staff Guidance on Specific Environmental Guidance for Light Water Small Modular Reactor Reviews;" and public comments related to the environmental review (Reference 5).

After consideration of the environmental impacts described in the CRN ESP EIS, the NRC staff recommended to the Commission that an ESP should be issued for the CRN Site (Reference 5). ESP-006 was ultimately issued for the CRN Site on December 19, 2019 (Reference 6). Although authorization for construction or operation of new nuclear units was not being sought by TVA at the time, and the ESP does not authorize construction or operation of a nuclear power plant, the CRN ESP EIS described the environmental impacts associated with building and operating two or more SMRs at the CRN Site.

Because of the extent of environmental information provided in the ESP proceeding and the ability to incorporate applicable information into a subsequent licensing action (e.g., a CPA), TVA anticipates being able to streamline the development of the CPA ER, such that the CPA ER could be available for submittal in advance of the PSAR.

### Applicable Regulations

The requirements of 10 CFR 2.101(a)(5) stipulate two conditions that an applicant must meet to utilize the two-part submittal provisions described within the regulation. First, applicants for a Construction Permit (CP) under 10 CFR Part 50, must be subject to 10 CFR 51.20(b) (licensing and regulatory actions requiring an EIS). The types of licensing and regulatory actions requiring an EIS or a supplement to an EIS are stipulated in 10 CFR 21.20(b). As an applicant to construct a SMR at the CRN Site under 10 CFR Part 50, TVA is subject to the provisions of 10 CFR 51.20(b), specifically paragraph (b)(1). Therefore, although the NRC has previously developed an EIS for the CRN Site, as detailed above, a supplement to the EIS is required for subsequent licensing actions, such as a CPA. Second, 10 CFR 2.101(a)(5)

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stipulates that a CP applicant must be of the type specified in 10 CFR 50.22. As a commercial facility, the CRN Site would be a Class 103 facility in accordance with 10 CFR 50.22.

Therefore, TVA meets the prerequisite conditions stipulated in 10 CFR 2.101(a)(5) for the use of the two-part submittal process and intends to utilize a two-part submittal for the CRN Site CPA.

The requirements of 10 CFR 2.101(a)(5) address the content of both parts of a two-part application stating that “[o]ne part shall be accompanied by the information required by 10 CFR 50.30(f) [Environmental Report],” while “[t]he other part shall include information required by 10 CFR 50.34(a) [Preliminary Safety Analysis Report (PSAR)] and, if applicable, 10 CFR 50.34a.”

The requirements of 10 CFR 2.101(a)(5) also state that whichever part is filed first shall contain the following as part of the submittal:

- The filing fee required by 10 CFR 50.30(e) and 10 CFR 170.21;
- The general information required by 10 CFR 50.33;
- The description and safety assessment of the site required by 10 CFR 50.34(a)(1) (PSAR); and
- The agreement limiting access to Classified Information required by 10 CFR 50.37.

The provisions of 10 CFR 2.101(a)(5) allow for either part of the CPA to be submitted first, as long as the first submission contains the information listed in the preceding bullets and submission of one part of the CPA does not precede or follow the other by longer than six months.

### 3.0 Technical Evaluation

The underlying purpose of 10 CFR 2.101(a)(5) is to facilitate the CPA process by allowing applicants to submit an application for a CP in two parts. The provisions for two-part CPA submittals were added as an amendment to the regulations of 10 CFR Part 2 on April 24, 1974, in the Federal Register. The intent of this final rule was to “*reduce the time required to bring on line nuclear power plants which satisfy all environmental and safety requirements...[and remove] unnecessary obstacles to the construction of power plants needed to meet the nation’s energy needs*” (39 FR 14506) (Reference 7).

NRC approval of the requested exemption from the requirement that the first part of the CPA include the information required by 10 CFR 50.34(a)(1) would allow TVA to submit the Environmental Report required by 10 CFR 50.30(f) in the first part of the CPA, prior to submitting the information required by 10 CFR 50.34(a)(1) (PSAR). NRC approval of this exemption early in the development of a CPA for the CRN Site would facilitate TVA’s planning efforts and provide regulatory certainty related to the order of submittal of the two parts of the CPA. This regulatory certainty would allow TVA to make scheduling, financial, and contractual decisions necessary for a more efficient and cost-effective development of the CPA. Submitting the Environmental Report in advance of the PSAR would also allow the NRC to initiate its environmental review at an earlier date, potentially allowing for an earlier completion. Issuance of this exemption by the NRC would not affect the NRC’s safety and environmental reviews of the CPA. Additionally, the full right of the public to participate in the licensing process will be maintained in accordance with the Commission’s regulations.

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TVA proposes to submit the following information in the first part of the CPA to be filed:

- The filing fee required by 10 CFR 50.33(e) and 10 CFR 170.21;
- The general information required by 10 CFR 50.33;
- The agreement limiting access to Classified Information required by 10 CFR 50.37; and
- The Environmental Report required by 10 CFR 50.30(f).

TVA proposes to submit the following information in the second part of the CPA to be filed:

- The description and safety assessment of the site required by 10 CFR 50.34(a)(1) (PSAR) (this includes information prescribed in 10 CFR 50.34(a)(2) through (a)(8)); and
- Information required by 10 CFR 50.34a(a) and (b).

The proposed content of both parts of the CPA would be sufficient to allow for an efficient and thorough review.

### **4.0 Justification for Exemption and Special Circumstances**

In accordance with 10 CFR 50.12, the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of 10 CFR Part 50 which are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. The Commission will not consider granting an exemption unless special circumstances are present. Although the action being requested by TVA is not for an exemption to a 10 CFR part 50 regulation, given the dependency of docketing a CPA in accordance with 10 CFR 2.101(a), in order to satisfy other requirements of 10 CFR Part 50, TVA has determined it is appropriate to evaluate this exemption using the criteria of 10 CFR 50.12.

As discussed below, this exemption request satisfies the provisions of 10 CFR 50.12.

(1) The exemption is authorized by law

The exemption would allow TVA to submit the Environmental Report required by 10 CFR 50.30(f) in the first part of the construction permit application, and defer the information required by 10 CFR 50.34(a)(1) to the second part of the construction permit application. The proposed exemption would not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations. Therefore, the exemption is authorized by law.

(2) The exemption will not present an undue risk to public health and safety

The underlying purpose of 10 CFR 2.101(a)(5) is to facilitate the construction permit application process by allowing applicants to submit an application for a construction permit in two parts. The provisions for two-part construction permit application submittals were added as an amendment to the regulations of 10 CFR Part 2 on April 24, 1974, in the Federal Register. The intent of this final rule was to "*reduce the time required to bring on line nuclear power plants which satisfy all environmental and safety requirements...[and remove] unnecessary obstacles to the construction of power plants needed to meet the nation's energy needs*" (39 FR 14506).

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The provisions of 10 CFR 2.101(a)(5) state that “[o]ne part shall be accompanied by the information required by 10 CFR 50.30(f),” while “[t]he other part shall include information required by 10 CFR 50.34(a) and, if applicable, 10 CFR 50.34a.” The requirements of 10 CFR 2.101(a)(5) also state that whichever part is filed first shall also contain the following as part of the submittal:

- The filing fee required by 10 CFR 50.30(e) and 10 CFR 170.21;
- The general information required by 10 CFR 50.33;
- The description and safety assessment of the site required by 10 CFR 50.34(a)(1); and
- The agreement limiting access to Classified Information required by 10 CFR 50.37.

The provisions of 10 CFR 2.101(a)(5) allow for either part of the construction permit application to be submitted first, as long as the first submission contains the information listed in the preceding bullets and submission of one part of the construction permit application does not precede or follow the other by longer than six months.

TVA recognizes that conforming information may be included in both parts of the application. TVA will maintain processes and procedures to identify and address any changes to the first part of the application that result from the ongoing development of the second part of the application. If necessary, TVA will supplement the first part of the application to ensure conformance between information provided in the two parts of the application.

Based on the administrative nature of the exemption request, as described above, no new accident precursors are created by allowing TVA to defer submittal of the preliminary safety analysis report required by 10 CFR 50.34(a) to the second part of the construction permit application. Thus, the probability of postulated accidents is not increased. Also, based on the above, the consequences of postulated accidents are not increased.

The Commission will continue to have a full opportunity to conduct a complete and thorough safety and environmental review of the construction permit application, and the full right of the public to participate in the licensing process will be maintained in accordance with the Commission’s regulations. The NRC will not issue the construction permit for the CRN Site unless and until it makes the requisite findings under 10 CFR Parts 50 and 51. Therefore, there is no undue risk to public health and safety.

(3) The exemption is consistent with the common defense and security

As discussed above, the proposed exemption would allow TVA to defer submittal of the preliminary safety analysis report required by 10 CFR 50.34(a) to the second part of the construction permit application. The order of submittal of a construction permit application has no relation to security issues. Therefore, the common defense and security is not affected by this exemption.

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### (4) Special circumstances are present, such that the exemption request should be granted

In accordance with 10 CFR 50.12(a)(2), the NRC will not consider granting an exemption to its regulations unless special circumstances are present. As stipulated in 10 CFR 50.12(a)(2)(ii), special circumstances are present whenever application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule. The underlying purpose of 10 CFR 2.101(a)(5), as discussed previously, is to facilitate the application submittal process for construction permit applicants when it is in the interest of the public to remove unnecessary obstacles to meet the needs of the nation.

When 10 CFR 2.101(a)(5) was originally written, the regulation was intended to “*reduce the time required to bring on line nuclear power plants which satisfy all environmental and safety requirements*” (39 FR 14508) (Reference 8). As noted above, the requested exemption would allow TVA to submit the Environmental Report required by 10 CFR 50.30(f) in the first part of the construction permit application, prior to submitting the information required by 10 CFR 50.34(a)(1) (Preliminary Safety Analysis Report). Application of the rule, as written, could potentially prohibit the submittal of the Environmental Report required by 10 CFR 50.30(f) prior to submittal of the Preliminary Safety Analysis Report, thereby delaying, rather than facilitating, the application submittal process, which would not serve the underlying purpose of the regulation. Approval of the exemption request early in the development of the CPA would ensure that any potential delays with submittal of the second part of the application that may become evident after the first part of the application have been submitted do not jeopardize compliance with 10 CFR 2.101(a)(5).

NRC approval of this exemption early in the development of a construction permit application for the Clinch River Nuclear Site would facilitate TVA’s planning efforts and provide regulatory certainty related to the order of submittal of the two parts of the construction permit application, allowing TVA to make scheduling, financial, and contractual decisions necessary for a more efficient and cost-effective development of the construction permit application, consistent with the underlying purpose of the regulation. Additionally, submitting the Environmental Report in advance of the Preliminary Safety Analysis Report would allow the NRC to initiate its environmental review at an earlier date, thereby allowing for an earlier completion. The ability of TVA and the NRC to disposition the environmental aspects of the construction permit application earlier will facilitate the licensing process.

Therefore, because the application of the relevant portions of 10 CFR 2.101(a)(5) is not necessary to achieve the underlying purpose of this regulation, the special circumstances required by 10 CFR 50.12 for the granting of an exemption from 10 CFR 2.101(a)(5) exist.

## 5.0 Precedent

The requirements of 10 CFR 2.101(a)(5) have been the subject of several exemption requests. Specifically, UniStar Nuclear (UniStar), at the time of submittal of the 10 CFR Part 52 Combined License Application (COLA) for Calvert Cliffs Unit 3, requested an exemption from a previous version of 10 CFR 2.101(a)(5) (Reference 9). At the time of the UniStar COLA submittal, the



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two part submittal process outlined in 10 CFR 2.101(a)(5) could only be used in conjunction with a Construction Permit Application (CPA). However, NRC rulemaking had commenced with the intention of expanding the two-part submittal provisions of 10 CFR 2.101(a)(5) to include COLAs. UniStar requested the exemption to enable submittal of the Calvert Cliffs COLA in two parts prior to implementation of the new 10 CFR 2.101(a)(5) rule. The COLA complied with the new 2.101(a)(5), as proposed in rulemaking. The exemption request became moot because the revised 10 CFR 2.101(a)(5) rule was implemented prior to docketing of the Calvert Cliffs COLA.

In relation to its CPA for a proposed medical isotope production facility, SHINE Medical Technologies (SHINE) requested (Reference 10) and received (Reference 11) an exemption from 10 CFR 2.101(a)(5) that enabled submittal of the SHINE CPA in two parts. As previously detailed, 10 CFR 2.101(a)(5) stipulates that an applicant for a CP under 10 CFR Part 50, must be subject to 10 CFR 51.20(b). The NRC had previously determined that construction and operation of a medical isotope production facility does not require an EIS under 10 CFR 51.20(b); therefore, 10 CFR 2.101(a)(5) does not apply to such facilities. Although the Commission could determine that SHINE's proposed action should be covered by an EIS, the exemption was necessary in order for SHINE to submit the CPA in two parts, which allowed for an earlier review of the Environmental Report by the NRC, and an earlier decision on whether an EIS was required. Or, if it had been determined that an EIS was not required, then the two-part submittal would have enabled an earlier completion of the environmental review and ultimate issuance of the CP and construction of the SHINE facility (Reference 10).

### **6.0 Conclusion**

TVA has concluded, based on the information provided above, that the requested exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security. Additionally, special circumstances are present. Based on the procedural nature of this exemption request, TVA has concluded that granting this exemption would not have an effect on the quality of human health or the environment.

### **7.0 Environmental Assessment**

A review has determined that the proposed exemption meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(25) for a licensing action that is categorically excluded from an environmental assessment because the proposed exemption: 1) neither involve a significant reduction in the margin of safety nor creates a possibility of an accident, thus resulting in no significant hazards consideration; 2) would not result in the release of effluents, thus resulting in no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; 3) neither introduces new radiological hazards nor increases existing radiological hazards, thus resulting in no significant increase in individual or cumulative public or occupational radiation exposure; 4) would not involve construction as defined in 10 CFR 51.4, thus resulting in no significant construction impact; 5) would occur prior to any radiological components being in place at the facility and would not create any new accident precursors, thus resulting in no significant increase in the potential for or consequences from radiological accidents; and 6) would allow the submission of a construction permit application in two parts in an order different than required by 10 CFR 2.101, which is related to a scheduling requirement and is administrative in nature in accordance with 10 CFR 51.22(c)(25)(G) and (I), respectively.

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### 8.0 References

1. TVA Letter CNL-16-081 to NRC, "Application for Early Site Permit for Clinch River Nuclear Site," (ADAMS Accession No. ML16139A752) dated May 12, 2016
2. Federal Register, Vol. 82, No. 8 (82 FR 3812), "Tennessee Valley Authority; Clinch River Nuclear Site," dated January 12, 2017
3. TVA Letter CNL-17-151 to NRC, "Revision1 of Application for Early Site Permit for Clinch River Nuclear Site," (ADAMS Accession No. ML18005A067) dated December 15, 2017
4. TVA Letter CNL-19-018 to NRC, "Resubmittal of Clinch River Early Site Permit Application Revision 2," (ADAMS Accession No. ML19030A485) dated January 18, 2019
5. NRC, NUREG-2226, Volume 1, "Environmental Impact Statement for an Early Site Permit (ESP) at the Clinch River Nuclear Site, Final Report, Chapters 1 to 12," (ADAMS Accession No. ML19073A099) dated April 30, 2019
6. Early Site Permit No. ESP-006, "Tennessee Valley Authority - Clinch River Nuclear Site Early Site Permit, Docket No. 52-047," (ADAMS Accession No. ML19352D868) dated December 19, 2019
7. Federal Register, Vol. 39, No. 80 (39 FR 14506), "Pre-Construction Permit Activities," dated April 24, 1974, Accessed via [https://archives.federalregister.gov/issue\\_slice/1974/4/24/14505-14509.pdf#page=2](https://archives.federalregister.gov/issue_slice/1974/4/24/14505-14509.pdf#page=2)), accessed on January 19, 2022
8. Federal Register, Vol. 39, No. 80 (39 FR 14508), dated April 24, 1974
9. UniStar Nuclear Letter to NRC, "UniStar Nuclear, Project No. 746, Submittal of a Partial Combined License Application for the Calvert Cliffs Nuclear Power Plant, Unit 3, Application for Withholding of Documents, and Request for Exemption," (ADAMS Accession No. ML071980292) dated July 13, 2007
10. SHINE Medical Technologies, Inc. (SHINE) Letter to NRC, "Request for Exemption to Submit Application for Construction Permit in Two Parts," (ADAMS Accession No. ML13051A007) dated February 18, 2013
11. NRC Letter to SHINE, "SHINE Medical Technologies, Inc. - Exemption From Certain Requirements of 10 CFR 2.101(a)(5), Regarding the Submission of a Construction Permit Application in Two Parts (TAC No. ME7820)," (ADAMS Accession No. ML13072B345) dated March 20, 2013