

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

June 4, 2025

MEMORANDUM TO:	Samantha C. Lav, Chief Fuel Facility Licensing Branch Division of Fuel Management Office of Nuclear Material Safety and Safeguards
FROM:	James R. Downs, Senior Project Manager Fuel Facility Licensing Branch Division of Fuel Management Office of Nuclear Material Safety and Safeguards
SUBJECT:	SUMMARY OF MAY 14, 2025, PUBLIC MEETING – FUEL FACILITY

LICENSING BEST PRACTICES SUMMIT On May 14, 2025, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting to discuss best practices for licensing fuel facilities. The meeting notice is available in the NRC's Agencywide Documents Access and Management System (ADAMS) Accession Number ML25127A260. This hybrid meeting, which had 32 in-person attendees and roughly 80 virtual attendees, was held at NRC Headquarters and via teleconference using the Microsoft Teams

During the meeting, the NRC staff used a slide presentation (ML25125A231) to aid the discussion of the best practices for licensing fuel facilities. The NRC staff discussed best practices for each of the five stages of licensing: pre-application, submittal of an application, acceptance review, technical review, and issuance. The noted best practices have been shown to facilitate the licensing process and more efficiently utilize resources for both the NRC and applicants – however, the NRC staff was clear that the best practices are not regulatory requirements and that conforming is not mandatory to receive an NRC license. After the discussion between the NRC staff and industry representatives on the best practices for each stage of licensing, the NRC staff provided members of the public with the opportunity to ask questions and provide feedback.

Toward the end of the meeting, representatives from the Nuclear Energy Institute (NEI) used a slide presentation (ML25127A280) to provide feedback on the potential improvements discussed during the public meeting held on April 10, 2025, regarding the Materials Licensing Efficiencies and Processes (M-LEAP) efforts related to fuel facilities (ML25112A270). The NRC staff was generally aligned with NEI's prioritization of the long-term potential improvements and the effort to enact the improvements as available resources will allow.

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platform. The agenda and attendance list are enclosed.

Throughout the discussion of best practices, the NRC staff and industry representatives shared experiences that illustrated success and identified potential improvements during each phase of the licensing process:

# Pre-application

- An industry representative shared how his pre-application engagements from earlier in 2025 were more robust than he previously had experienced it was noted that NRC staff provided more detailed feedback than in previous pre-application engagements and clear direction was received by the applicant for enhancing the submittal.
- Industry representatives requested that the NRC staff provide a greater level of detail in publicly available meeting summaries, so that future applicants also have actionable directions.

# Submittal of an application

- The NRC staff noted that when an exemption is approved to bifurcate the safety and environmental submittals, the staff's review on the first portion of the submittal is limited until both portions of the submittal are received.
- Industry representatives noted that Title 10 of the Code of Federal Regulations, Section 70.22, requires detailed information (e.g., a full description of the applicant's program for control and accounting or an enrichment applicant's security program) that can be challenging for the applicant to provide at the time a license application is submitted a time when the project is often still being designed. The NRC staff emphasized that applications can be supplemented after the initial submittal to provide greater detail, but some level of detail is needed regarding those requirements in order for the NRC staff to accept the application for detailed technical review.

# Acceptance review

- The NRC staff clarified that the sub-bullets on slide 11 (i.e., examples supporting that "60-days is a tight metric for acceptance reviews") are only meant to illustrate that the timeline is challenging – the staff confirmed that most reviews do not have requests for supplemental information (RSIs).
- Industry representatives suggested that: (1) RSIs should be rare, (2) robust preapplication reviews should lead to more efficient acceptance reviews, (3) the NRC should provide publicly available guidance to the NRC staff on how to conduct acceptance reviews, and (4) continuity of the NRC's review team throughout the licensing process is a best practice.
- The NRC noted that application quality is a significant contributor to whether RSIs are needed.

# Technical review

• The NRC staff and industry representatives agreed that good communication is the key to addressing requests for additional information (RAIs) quickly and that the timeframes listed on slide 14 for RAIs are challenging (i.e., 30 days for response, measured from the

date that draft RAIs are provided, with clarification calls requested within 3 days and scheduled within one week of draft RAI being provided).

### Issuance

- Industry representatives noted that the NRC's expected implementation of a new
  program to address controlled unclassified information (CUI) may necessitate a shift
  back to paper copies of sensitive licenses and licensing documents being mailed to
  licensees some licensees do not have the computer systems to processes CUI that is
  emailed.
- Industry representatives also recommended that the NRC staff evaluate the value of NRC licenses containing specific dates of licensing basis documents being tied down in license conditions.

Enclosure: Meeting Agenda and Attendance List

# SUBJECT: SUMMARY OF MAY 14, 2025, PUBLIC MEETING – FUEL FACILITY LICENSING BEST PRACTICES SUMMIT

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# MEETING AGENDA AND ATTENDANCE LIST

# MAY 14, 2025, PUBLIC MEETING – FUEL FACILITY LICENSING BEST PRACTICES SUMMIT

# <u>AGENDA</u>

Time	Торіс	Speaker
1:00 PM	Opening Remarks	NRC and Industry
	Licensing Best Practices – Pre-Application	NRC and Industry
	Questions and answers	Public
	Licensing Best Practices – Submittal of an Application	NRC and Industry
	Questions and answers	Public
	Licensing Best Practices – Acceptance Review	NRC and Industry
	Questions and answers	Public
	Licensing Best Practices – Technical Review	NRC and Industry
	Questions and answers	Public
	Licensing Best Practices – Issuance	NRC and Industry
	Additional Feedback – Potential Improvements Discussed During the Public Meeting on April 10, 2025	NRC and Industry
	Closing remarks	NRC
4:00 PM	Adjourn	

# ATTENDANCE LIST

Name	Affiliation
Alexis Sotomayor-Rivera	NRC
Amy McKenna	NRC
Amy Minor	NRC
Andrea Jennetta	International Nuclear Associates, Inc Fuel Cycle Week
Andrea Johnson	NRC
Ashby Bridges	General Matter
Ashley Morris	Nuclear Fuel Services
Benjamin Karmiol	NRC
Bob Sanders	Honeywell
Brandon Bout	NRC
Brandon Hanson	Framatome
Brian Wagner	NRC
Brittany Lutz	Nuclear Innovation Alliance
Bryson Roberson	ClearPath
Camille T. Zozula	Westinghouse Electric Company
Carolyn Fairbanks	NRC
Caylee Kenny	NRC
Celimar Valentin Rodriguez	NRC
Chad Oelstrom	NRC
Chandi Davidson	Global Nuclear Fuel - Americas

Name	Affiliation
Christine Saah Nazer	NRC
Cinthya Roman	NRC
Clinton McGill	NRC
Cynthia Taylor	NRC
Dallas M. Gardner	Nuclear Fuel Services
Dan Watts	Centrus / ACO
Daniel Ashworth	BWXT Nuclear Operations Group
Daniel Forsyth	NRC
Dante Johnson	NRC
Dave Gasperson	NRC
David Tiktinsky	LIST
Deric Tilson	The Breakthrough Institute
Diana Diaz Toro	NRC
Diana Woodyatt	NRC
Doug Weaver	General Matter
Douglas Diethrich	NRC
Eben Allen	NRC
Eliezer Goldfeiz	NRC
Eric C. Michel	NRC
Faris Badwan	Orano USA
Gerond George	NRC
Grace Pennington	NRC
Greg Core	Nuclear Energy Institute (NEI)
Gregg Goff	NRC
Greta Knowles	NRC
Haimanot Yilma	NRC
Hector Rodriguez	NRC
Isaac Johnston	NRC
James Downs	NRC
James Drabble	NRC
James Hammelman	NRC
Jana Bergman	Curtiss-Wright
Jannette Worosilo	NRC
Jason Piotter	NRC
Jeanette Arce	NRC
Jennfier Wheeler	TRISO-X
Jesse Carlson	NRC
Jill Shepherd	NRC
Jimmy Chang	NRC
John Russell	NRC
Jonathan Marcano Lozada	NRC
Jonathan Rowley	NRC
Joseph Goodridge	NRC
Joy Jiang	The Breakthrough Institute
Juan Lopez	NRC

Name	Affiliation
Justin Raudabaugh	NRC
Kelly Sullivan	NRC
Kimyata Morgan-Butler	NRC
LaDonna Suggs	NRC
Langston Lewis	NRC
Lindsey Cooke	NRC
Lisa Dimmick	NRC
Lou McKown	NRC
Martin M Ortiz Gonzalez	NRC
Matt Bartlett	NRC
Matthew Doyle	NRC
Meg Day	NRC
Mike Call	NRC
Mitchell Dehmer	NRC
Nicole Cortes	NRC
Noel Pitoniak	NRC
Norma Garcia Santos	NRC
Osiris Siurano-Perez	NRC
Patrick Donohue	NRC
Peter Vescovi	Orano USA
Peyton Doub	NRC
Ravi Penmetsa	NRC
Richard Skokowski	NRC
Robert Mathis	NRC
Robert Sun	NRC
Samantha Lav	NRC
Scott Murray	NEI
Sean Patterson	Honeywell
Shana Helton	NRC
Stacey Imboden	NRC
Stephen G. Subosits	Westinghouse Electric Company
Stephen Poy	NRC
Steven Pope	Information Systems Laboratories
Tekia Govan	NRC
Thomas Vukovinsky	NRC
Tim Knowles	Global Laser Enrichment
Tim Tate	Framatome
William Deric Tilson	The Breakthrough Institute
Wyatt Padgett	Urenco USA
Yawar Faraz	NRC
Yilia Vega Claudio	NRC
Zee St Hilaire	NRC