

SEPTEMBER 17-18, 2025, REGULATORY AUDIT PLAN FOR TOPICAL REPORT

ANP-10300, REVISION 1, SUPPLEMENT 1P, REVISION 0

“AURORA-B: ADDRESSING L&Cs 11, 12, AND 18”

FRAMATOME, INC.

DOCKET NO. 99902041

EPID: L-2025-TOP-0023

## **1.0 BACKGROUND**

By letter dated June 16, 2025 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML25167A304), Framatome, Inc. (Framatome) submitted Topical Report (TR) ANP-10300, Revision 1, Supplement 1P, Revision 0, “AURORA-B: Addressing L&Cs [Limitations and Conditions] 11, 12, and 18,” for U.S. Nuclear Regulatory Commission (NRC) staff’s review and approval.

The NRC staff will perform a regulatory audit in accordance with Office of Nuclear Reactor Regulation Office Instructions LIC-111, Revision 2, “Regulatory Audits” (ML24309A281), and LIC-500, Revision 9, “Topical Report Review Process” (ML20247G279). The audit will facilitate the NRC staff with discussions on technical issues, in determining whether requests for additional information are needed, and with drafting the safety evaluation.

## **2.0 REGULATORY AUDIT BASES**

Applicable regulations are found in the following sections of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, “Domestic Licensing of Production and Utilization Facilities”:

- 10 CFR Part 50, Appendix A, General Design Criteria 10, which require the reactor core, coolant, and protection systems are designed to provide sufficient margin to the specified acceptable fuel design limits (SAFDLs) during normal operation and including anticipated operational occurrences (AOOs).

Additional review guidance is provided in NUREG-0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition,” Section 4.2, “Fuel System Design.” The regulatory audit will be held in accordance with the NRC procedures as described in LIC-111, “Regulatory Audits.

## **3.0 REGULATORY AUDIT SCOPE**

The purposes of this audit are to (1) review analyses and calculations described in the TR and (2) continue resolution discussions concerning issues with Framatome’s approach to resolving L&C 12 that were identified during the acceptance review. The audit will provide efficiencies for the NRC staff by providing an opportunity for effective discussions with Framatome staff on the TR methodology and for clarifications on unresolved questions.

#### **4.0 LOGISTICS**

The NRC staff will conduct a virtual audit via Microsoft Teams for 2 days from September 17, 2025, to September 18, 2025. An electronic reading room (ERR) will be set up in advance to allow the NRC staff to review pertinent documentation. The ERR will be in accordance with the following restrictions:

- The ERR will be password protected, and passwords will be distributed to NRC staff members directly involved in the ANP-10300, Supplement 1P, review on a need-to-know basis.
- The ERR will not support any printing, saving, or downloading functions.
- The NRC staff members given password access to the ERR will be informed of the conditions of use of the ERR by NRC Project Managers.
- The conditions associated with the ERR will be maintained throughout its use during the ANP-10300, Supplement 1P, review process.
- Documents posted to the ERR will be limited to basis and other reference material cited in the TR, unless otherwise agreed upon by Framatome and NRC management.

#### **5.0 TEAM ASSIGNMENTS**

Key Framatome personnel involved in the development of the TR should be made available for interactions on a mutually agreeable schedule to respond to any questions from the NRC staff.

Noushin Amini, Technical Reviewer (NRR/DSS/SNFB)  
Kevin Heller, Technical Reviewer (NRR/DSS/SNFB)  
John Lehning, Technical Reviewer (NRR/DSS/SNFB)  
Ngola Otto, Project Manager (NRR/DORL/LLPB)

#### **6.0 DISCUSSION TOPICS AND REQUESTED DOCUMENTS**

Discussion Topics

The following general topics, which consider issues identified during the NRC staff's acceptance review, have been developed for discussion during the audit. Please have subject matter experts available for discussion of these general topics. More detailed questions may develop during the audit and remainder of the review.

Question Topics regarding L&C 12:

- Detailed clarification of the [[

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- Technical justification for utilizing [[

]] including an assessment of the conservativeness of this validation methodology.

- Rationale for selecting [[ ]] to facilitate a consistent and representative comparison between [[ ]] and measured data.
- Further quantification and clarification of the uncertainty associated with [[ ]] including an evaluation of potential bias in the predicted [[ ]].
- Expanded technical explanation to improve clarity and understanding of the representative AURORA-B case used for analysis, and further explanation and justification for its conservatism with respect to the expected range of U.S. BWR plant conditions.

#### Requested Documents

The NRC staff requests that calculations, reports, and other documents relevant to L&Cs 11, 12, and 18 be made available via ERR in advance of the audit to facilitate the staff's review and discussion in the regulatory audit. The NRC staff are available to discuss if Framatome has questions concerning the relevance of specific documents to the audit objectives.

#### 7.0 DELIVERABLES

The NRC team will develop an audit summary report to convey the results. The report will be placed in ADAMS within 90 days of the completion of the final audit session. Any audit information the NRC staff determines to be necessary to support the development of the NRC staff's safety evaluation will be requested to be submitted on the docket.