



POLICY ISSUE

(Information)

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SECY-26-0034

FOR: The Commissioners

FROM: Michael F. King
Executive Director for Operations

SUBJECT: NRC REGULATORY PATHWAYS AND LICENSING READINESS FOR
NEAR TERM LARGE LIGHT-WATER REACTOR DEPLOYMENT

PURPOSE:

The purpose of this paper is to keep the Commission informed of anticipated large light-water reactor (LWR) licensing and construction activities and the U.S. Nuclear Regulatory Commission (NRC) staff's readiness to efficiently enable the safe and secure deployment of these new reactors. This paper describes the expected design certification review activities under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants," Subpart B, "Standard Design Certifications," and the four categories of anticipated combined license (COL)¹ applications and/or activities under 10 CFR Part 52 Subpart C, "Combined Licenses," including the NRC staff's activities related to construction of large LWRs. The paper also describes opportunities for expedited licensing in accordance with Section 207, "Combined License Review Procedure," of the Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy Act of 2024 (ADVANCE Act).

Resources for licensing and oversight of new large LWRs will be addressed through the NRC's planning, budgeting and performance management process. This paper does not address any new commitments or resource implications.

SUMMARY:

This paper provides the Commission with an overview of the anticipated regulatory and industry landscape for large LWR deployment, with emphasis on licensing activities related to the AP1000 standard certified design (10 CFR Part 52, Appendix D). This paper describes the

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¹ Combined License Holders for New Reactors (<https://www.nrc.gov/reactors/new-reactors/large-lwr/col>).

anticipated regulatory approaches for an amendment to the AP1000 design certification rule, deployment of large LWRs, expedited construction, and the development of future guidance for NRC licensees' use of ASME Code stamped components that were fabricated under the provisions of ASME Code Case N-883, "Construction of Items Prior to the Establishment of a Section III, Division 1, Owner."

The paper describes the NRC staff's readiness and planned actions to support timely review and licensing decisions, consistent with the requirements of the ADVANCE Act and Executive Order (EO) 14300, "Ordering the Reform of the Nuclear Regulatory Commission," which requires the NRC staff to take a number of actions to help provide the American people with "safe, abundant nuclear energy." To achieve these objectives, the NRC staff plans to implement structured, risk-informed, and parallel review processes and expand pre-application engagement with applicants and licensees to engage on how to leverage legacy docket material and lessons learned from prior licensing and construction experience to gain efficiency in their licensing plans and the review of their applications.

BACKGROUND:

The NRC has previously issued multiple combined licenses and early site permits (ESPs) for large LWRs. In addition, the NRC has previously reviewed and certified by rule four large LWR designs under 10 CFR Part 52, Appendices A, D, E, and F, the Advanced Boiling-Water Reactor (ABWR), Advanced Power Reactor 1400 (APR1400), AP1000, and Economic Simplified Boiling-Water Reactor (ESBWR). These various decisions can be leveraged for future licensing and construction of a large LWR.

The Commission certified the standard AP1000 design in 2006 (71 FR 4464; January 27, 2006), approved an amendment to the design certification in 2011 (76 FR 82079; December 30, 2011), and subsequently issued several COLs authorizing construction and operation of AP1000 reactors, including both reference and subsequent COLs (Agencywide Documents Access and Management System (ADAMS) Accession No. ML053540251). In 2021, the AP1000 design certification was updated and its duration extended (86 FR 52593; September 22, 2021) (86 FR 64063; November 17, 2021). Most recently, on August 26, 2025, the NRC published a direct final rule extending the duration of all nuclear power plant design certifications, including the AP1000, from 15 years to 40 years (90 FR 41503).

Two AP1000s were deployed in the United States: Vogtle Electric Generating Plant (Vogtle), Units 3 and 4. Vogtle, Unit 3, entered service on July 31, 2023, and Unit 4, on April 29, 2024. The valuable lessons learned from licensing Vogtle, Units 3 and 4, and overseeing their construction will benefit future deployment of all reactor designs, and Vogtle, Units 3 and 4 are anticipated to be the reference plants for future subsequent AP1000 COLAs. However, the as-built configuration and cumulative licensing changes at Vogtle have not yet been formally incorporated into a revised AP1000 Design Control Document (DCD) suitable for direct use by future applicants. The NRC staff anticipates receiving a request from Westinghouse in the near term to amend the design certification rule to incorporate a new revision² of the AP1000 DCD that reflects these changes. Following the revision of the DCD, the staff anticipates additional

² Design Certification Application Review – AP1000 Amendment (<https://www.nrc.gov/reactors/new-reactors/large-lwr/design-cert/amended-ap1000>).

interest in AP1000 construction projects. The NRC staff further anticipates that licensing reviews of future applications referencing the updated AP1000 DCD will demonstrate the efficiencies that can be achieved for “Nth-of-a-kind” large LWR licensing activities.³

In addition to the anticipated amendment to the AP1000 design certification, it is plausible that there may be similar interest in other large LWR projects. The NRC staff has identified four likely categories of new large LWR COL licensing activities and regulatory pathways for deploying LWRs that leverage work done for prior licenses and applications to the extent practicable.

DISCUSSION:

The industry landscape outlined above presents the Commission with a range of potential licensing activities, each with distinct regulatory implications. As described below, the NRC staff plans to streamline the design certification amendment process and COL application reviews referencing an approved design.

Amendment of the AP1000 Design Certification to Incorporate Previously Approved Safety Findings and as-Built Changes

During construction of Vogtle, Units 3 and 4, and partial construction of V.C. Summer Nuclear Station (V.C. Summer), Units 2 and 3, which also referenced the AP1000 design, design change issues were identified during the construction process that led to the review and approval of numerous license amendment requests. Many of these amendments⁴ involved a variety of departures from the original AP1000 standard certified design. Incorporating these as-built changes, along with lessons learned and departures and changes made under other applicable regulatory change processes (i.e., Appendix D to Part 52, Section VIII, “Processes for Changes and Departures”), into a revised, certified, standard design would provide an updated baseline for future AP1000 applicants. Changes to the design other than those previously approved by the NRC or implemented by the licensee under these regulatory change processes would require detailed technical review; however, the NRC staff anticipates that the planned amendment to the AP1000 design certification rule will incorporate few, if any, new changes because the purpose of the amendment is to reflect the as-built condition of the Vogtle units.

The NRC staff review of such an amendment request would focus on confirming the incorporation into the standard certified AP1000 design of safety-significant changes previously approved through license amendments for Vogtle, Units 3 and 4, and would not consider changes implemented under Southern Nuclear Operating Company’s change process that did not require prior NRC approval. This approach ensures that the amended design certification accurately reflects the validated, as-built AP1000 configuration for Vogtle Units 3 and 4, while avoiding unnecessary re-review.

Consistent with 10 CFR Part 52, Subpart B, the NRC may amend a design certification rule to reflect changes previously reviewed and approved because all safety-significant modifications have either undergone prior NRC review or did not require approval. Therefore, the NRC staff’s review would be limited in scope. The NRC staff plans to use a direct final rule process to

³ See SECY-25-0052, “Nth-Of-A-Kind Microreactor Licensing and Deployment Considerations,” November 13, 2025. (ML25317A650).

⁴ [ADAMS documents involving issuance of license amendments impacting both Vogtle Unit 3 and Vogtle Unit 4](#), but not all of these involve departures from the AP1000 standard certified design.

amend the AP1000 design certification in 10 CFR Part 52, Appendix D, to incorporate the Vogtle departures from the certified design into the design certification rule. The NRC staff plans to publish a direct final rule, and a companion proposed rule, concurrently in the *Federal Register*. The direct final rule will contain language that states that any significant adverse comments received will be considered as comments on the companion proposed rule and that, absent significant modifications to the proposed revisions requiring republication, the NRC staff will not initiate a separate comment period for the action. The Commission used this process in extending and amending the AP1000 design certification in 2021.⁵ If the NRC staff approves the changes and issues the amendment through a direct final rule, this process will promote regulatory efficiency and clarity by updating the AP1000 design certification to reflect the validated, as-built configuration and facilitating streamlined licensing for future applicants.

Combined Licenses and COL Applications with Prior Licensing History

The staff has reviewed the prior licensing history for applications submitted under the provisions of 10 CFR Part 52. Enclosure 1, "Regulatory Pathways for Referencing Prior Licensing Action," outlines the various regulatory pathways available for sites for which the NRC previously issued a COL or for which an applicant submitted a request for an NRC licensing action for a large LWR, including COL and early site permit (ESP) applications, as well as design certification applications, which are certified by rulemaking. Further, Enclosure 1 describes how those previous activities could be leveraged for future licensing and construction of a large LWR. The NRC staff has identified four unique categories of prior licensing activities, and the licensing pathways for each category are described below.

Category 1: Issued combined licenses for which construction has not been initiated

This category applies to sites for which the NRC issued COLs, at which no construction has occurred, and the COL either remains in effect or was terminated at the request of the COL holder. The staff plans to provide for commencement of construction regardless of whether the licensee deferred construction (COL is "on the shelf"), or terminated the COL. In 2018, the NRC staff considered the portions of the Commission Policy Statement on Deferred Plants (52 FR 38077; October 14, 1987) (1987 Policy Statement) that can be applied to COLs to develop the "Current NRC Staff Views on Applying the Deferred Plant Policy Statement to Part 52 Plants" (ML18065B257). Enclosure 2, "Terminated Combined Licenses" describes the applicability of the 1987 Policy Statement to a COL for a site at which the licensee has not initiated construction and the pathway by which the NRC may reactivate a terminated COL.

In order for the NRC staff to most efficiently allocate its resources, licensees that wish to commence construction under a deferred or "on the shelf" COL will need to provide the NRC staff with timely notification, e.g., at least 120 days before the expected construction restart date, to facilitate NRC staff resource planning for construction oversight. In addition, the NRC staff will need information such as the anticipated date of resumption of construction and a tentative schedule of major construction activities, which could be included in a licensee notification. This is the most expeditious pathway to initiation of construction under an existing COL. However, if an existing COL holder chooses to consider construction of a certified design different than that described in the Final Safety Analysis Report and specified in the license, the COL holder would need to submit a license amendment request to reference the alternate

⁵ See 86 FR 52593 (September 22, 2021)

reactor technology. Enclosure 1 contains a listing of issued COLs, the technology approved in each COL, and the alternate large LWR technologies with design certifications that could be considered.

For a COL that was terminated at the request of the COL holder, the NRC staff will need certain information in order to consider submissions to request reactivation of the terminated COL. Among other things, the NRC will need to consider confirmation that licensing basis documents are preserved, including a description of the licensee's plan to implement its NRC approved quality assurance program. In addition, environmental information will be needed to evaluate a request for COL reactivation, which could, if appropriate, include justification for a finding of no significant impact (FONSI), a description of the process used to identify new and significant environmental information and the associated impacts, or possibly refreshment of the environmental report (ER). For a terminated COL, a licensee may not commence construction until the NRC has reactivated the COL.

For a terminated COL, if the COL holder or its successor in interest did not preserve the licensing basis, the NRC staff anticipates that an applicant will either submit a new COL application that incorporates the original licensing basis and includes an updated ER or engage with the NRC staff on plans for an applicant-prepared environmental document. If an applicant wants to incorporate a previous COL application into a new COL application, it may do so under 10 CFR 52.8(b), "Combining licenses; elimination of repetition." If the application relies on previously reviewed and approved information, the NRC staff will, to the extent feasible, leverage information from previous reviews. The NRC staff encourages early engagement to discuss schedule, applicable regulatory requirements, and any planned updates. The NRC staff anticipates that such a COL application will reference the previous ER or the applicant will engage with the NRC staff on plans for an applicant-prepared document under the National Environmental Policy Act of 1969, as amended (NEPA). For such an application, the staff would review the applicant's process for identifying new and significant information and would compare any identified new information with the existing NEPA document to determine if it is significant and would trigger a supplemental NEPA document (ML120950050). Updated consultations under the Endangered Species Act and National Historic Preservation Act (NHPA) would be required, as appropriate.

Category 2: Issued combined license where construction began but was later suspended and the license terminated

This category applies to sites at which a licensee partially constructed a plant, but the COL was terminated after construction had begun. Currently, V.C. Summer Units 2 and 3, which reference the AP1000 reactor design, are the only facilities that fit in this category (ML17229B487). The COL holder voluntarily ceased construction of the facility on July 31, 2017, requested termination of its COLs on December 27, 2017, and the NRC approved termination of the COLs on March 6, 2019.⁶ In addition, one of the COL holders, South Carolina Energy & Gas (SCE&G) merged with Dominion Energy in January 2019. The NRC approved an indirect transfer of control of SCE&G's interest in V.C. Summer Units 2 and 3 via an order dated

⁶ Letter from Jeffrey B. Archie, SCANA, to NRC Document Control Desk, "South Carolina Electric & Gas Company (SCE&G), VCSNS Units 2 & 3 Notification of Termination of Project Construction" at 1 (August 17, 2017) (ML17229B487); Letter from Jeffrey B. Archie, SCANA, to NRC Document Control Desk, "South Carolina Electric & Gas Company (SCE&G) Request for Withdrawal of VCSNS Unit 2&3 COLs" at 1 (December 27, 2017) (ML17361A088); Letter from Frederick D. Brown, NRC, to Daniel G. Stoddard, South Carolina Electric & Gas Co., "Virgil C. Summer Nuclear Station, Units 2 and 3, Termination of Combined Licenses NPF-93 and NPF-94" at 1 (March 6, 2019) (ML18198A299).

August 30, 2018 (ML18129A076). The merger's potential effect on the proposals discussed in this paper involves complex questions that are beyond the scope of this paper. The NRC would not need to consider these complex questions if an applicant obtained the rights to the partially constructed V.C. Summer facilities and submitted a new COL application.⁷ Such an approach would provide a more efficient, stable, and predictable licensing approach for the applicant. Therefore, the NRC staff expects that should an applicant wish to construct AP1000s for V.C. Summer Units 2 and 3, the applicant will submit a new COL application that references the original licensing basis and as-built (partially constructed) status of the facility. The application could reference previously docketed information under 10 CFR 52.8(b), including the previously issued COL. This approach would facilitate the least resource-intensive and most efficient licensing review for both the applicant and the NRC. However, regardless of path chosen by a potential applicant, the NRC staff will prioritize efficiency and focus its review on areas of regulatory or safety significance.

Because construction of V.C. Summer Units 2 and 3 was terminated when each of the units was partially constructed, an applicant seeking approval to restart that project would need to assess, verify, and reconstitute the status of construction of the facility in order to demonstrate that design control, configuration management, record recovery, and quality assurance can be promptly re-established following license issuance. Under the 1987 Policy Statement, reinstatement would involve, among other things, verification of the construction status, maintenance, and preservation of equipment and materials as indicated above in regard to a COL under which the licensee did not perform construction activities (52 FR 38077; October 14, 1987). The staff has determined, however, that such information would not need to be obtained before reinstating the license. Instead of obtaining comprehensive documentation of current site conditions, gap analyses, and remediation or repair activities during pre-application engagement or in a COL application, the NRC staff plans to propose license conditions requiring the use of specified acceptable assessment methodologies to govern these activities. Pursuant to 10 CFR 52.79, the applicant must provide sufficient information in the COL application to fully describe construction programs at a functional level and at an increased level of detail where implementation choices could materially and negatively affect program effectiveness and acceptability. Such information could demonstrate that design control, configuration management, record recovery, and quality assurance can be promptly re-established following license issuance. The NRC, through construction oversight activities, will evaluate the licensee's process and determinations for which inspections, tests, analyses, and acceptance criteria (ITAAC) have been completed, which remain outstanding, and whether any previously completed ITAAC require re-verification due to the period of construction inactivity or changes in regulatory requirements. Final determination of ITAAC completion must be accomplished in accordance with 10 CFR 52.99. Only then will the agency be able to make findings in accordance with 10 CFR 52.103(g).

Pursuant to 10 CFR 52.80(b), the COL application must include the submittal of an ER or the applicant may coordinate with the NRC staff for plans for an applicant-prepared NEPA document. Because the COL application may incorporate a previous environmental review, the NRC staff would identify and evaluate any change from the previous NEPA evaluation to determine if there is any new and significant information that would trigger a supplemental

⁷ V.C. Summer Units 2 and 3 are not utilization facilities as defined under § 11cc.(1) of the Atomic Energy Act because they are not capable of making use of special nuclear material. Therefore, the prohibitions in § 101 do not apply to them. Reinitiation of construction, however, would involve the activities identified in 10 CFR 50.10(a)(1) and would require authorization under a construction permit (CP) or COL, either of which could be obtained through established NRC processes.

NEPA document (ML120950050). If needed, the NRC staff will document this evaluation using the most appropriate NEPA document. This could include a supplement to the previous NEPA document as required under 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions" (e.g., the supplemental environmental impact statement from the June 2025 subsequent license renewal for V.C. Summer Unit 1 (ML25076A659)). If no new and significant information is identified, then the NRC staff would document its evaluation in a memorandum that becomes part of the record of decision. This is a similar process to that used by other agencies. The NRC, however, will engage in consultations under the Endangered Species Act and NHPA, as appropriate.

Category 3: Combined license applications that were withdrawn or for which the review was suspended prior to issuance

This category includes COL applications for which the applicant either voluntarily withdrew its application or requested that the NRC suspend its review of the application prior to the completion of the NRC staff review or prior to a staff or Commission decision on the acceptability of the application. Enclosure 1 provides a list of COL applications that were withdrawn or suspended. For withdrawn COL applications, an applicant seeking to reactivate the project should submit a new COL application under 10 CFR Part 52, Subpart C and fully comply with current regulatory requirements. To promote efficiency, applicants are encouraged to incorporate relevant legacy docket materials by reference under 10 CFR 52.8(b), where appropriate, provided the material is reconciled with current regulations and standards.

For a COL application for which the review was suspended, the process to resume review begins with the applicant submitting a letter of intent to resume active application activities and engaging with the NRC staff on how to do so most efficiently. The NRC staff will assess the status, completeness, and continued relevance of previously submitted application materials, providing feedback on which portions remain valid, and which areas warrant updates or additional information. This approach enables a more efficient and focused review by concentrating NRC resources on safety-significant areas impacted by new or changed design features or analyses compared to the original submittal.

Where appropriate, the NRC staff will leverage previously evaluated information and will review applications to ensure that applicants address any regulatory changes, site-specific updates, or new information relevant to the project. Pre-application engagement is strongly encouraged to support submittal of high-quality applications, minimize duplicative effort, and support timely and predictable licensing.

For applicants that are submitting a new COL application where an Environmental Impact Statement was previously issued, the applicant could submit an ER or an applicant-prepared NEPA document that would incorporate by reference the previous NEPA review and focus on new and significant information. The NRC staff would complete a focused review to determine if there is any new and significant information that would trigger a supplemental NEPA document (ML120950050).

For applicants that are submitting a new COL application where the environmental review was not completed, the applicant could submit an ER or an applicant-prepared NEPA document that would incorporate by reference from the previous ER, focusing on new and significant information and describing the proposed action. Updated or new consultations under the Endangered Species Act and NHPA would be required, as appropriate.

Category 4: New applications at sites without a prior COL application

This category involves new COL applications for sites with no prior COL licensing history. To expedite the review, applicants should leverage designs that have already been reviewed by the NRC, and where available, a site that has already been evaluated as documented in an ESP. Enclosure 1 contains a list of issued ESPs. COL applicants would typically reference a certified design under 10 CFR Part 52, Subpart B. The NRC staff would conduct a full-scope review of site-specific information required by 10 CFR 52.79(a), including safety, environmental, security, and emergency preparedness evaluations. For a site where an ESP has been previously issued and the applicant chooses to reference that permit in its COL application, the scope of the site-specific review would be limited because the NRC staff will rely on the findings and conclusions from the existing ESP.

For prospective new sites, the NRC staff anticipates that an applicant could submit an ER or may pursue an alternative approach through the use of a draft applicant-prepared NEPA document, such as an environmental impact statement. Under this approach, a prospective applicant could start pre-application interactions with the NRC during which the NRC staff can become familiar with the site-specific environmental impacts and provide feedback regarding the prospective applicant's preliminary approach to the environmental document. Through continued pre-application interactions, the NRC staff can provide additional feedback throughout its development. Once submitted as part of the COL application, the environmental document, which could be in the form of a draft NEPA document, would be formally reviewed, revised as necessary, and, when complete, published. The NRC staff would maintain full responsibility for the adequacy and defensibility of the NEPA document. Consultations under the Endangered Species Act and NHPA would be required, as appropriate.

Considerations for Expedited Construction

In addition to identifying opportunities for expedited licensing, the NRC staff is identifying pathways for expediting construction activities for advanced reactors, including new large LWRs, that may be undertaken by future applicants to reduce overall project timelines to bring new nuclear power to the grid safely. The NRC has defined construction in 10 CFR 50.10, "License required; limited work authorization." Consistent with the ADVANCE Act and recently issued Executive Orders, the NRC staff has identified opportunities for enabling current and potential applicants to build or install structures, systems, and components for which construction does not have a reasonable nexus to safety on optimized timeframes, prior to issuance of a COL or construction permit (CP). Enclosure 3 describes currently available regulatory pathways that would support expedited construction for new large LWRs. The enclosure also highlights those activities which are outside the NRC's definition of construction and can be undertaken by a future applicant prior to receiving a COL or CP. Additional opportunities to expedite construction can be pursued by applying for a Limited Work Authorization in accordance with the requirements in 10 CFR 50.10 or exemptions from the definition of construction in accordance with the requirements in 10 CFR 50.12, "Specific Exemptions." The NRC staff is also considering the potential for future changes to the definition of construction or guidance specific to construction as part of its regulatory reform activities directed by EO 14300. The NRC staff's strategy is provided in SECY-25-0074, "Expedited Construction of Certain Structures, Systems, and Components" (ML25157A119). Applicants are encouraged to engage with the NRC staff when planning for expedited construction, as the determination of which activities are outside the definition of construction is design dependent. The NRC staff encourages pre-application

engagement through meetings or the submission of white papers and topical reports to facilitate the early identification and resolution of technical issues that may affect an applicant's regulatory approach.

To provide regulatory oversight of construction activities at new large LWR sites, the NRC staff would implement the Advanced Reactor Construction Oversight Program (ARCOP). The ARCOP framework reflects an approach that optimizes the NRC's established oversight framework to ensure the program is responsive to the evolving reactor landscape and applies a level of regulatory oversight commensurate with the risk posed by a variety of new facilities. The ARCOP is described in SECY-25-0103, "Update on Development of the U.S. Nuclear Regulatory Commission's Advanced Reactor Construction Oversight Program" (ML25024A243).

Procurement of Long Lead Items and Fabrication of American Society of Mechanical Engineers (ASME) Code stamped components prior to Identification of an Owner, as defined in the ASME Code

By letter dated July 11, 2025, Nuclear Energy Institute (NEI) submitted to the NRC guidance document NEI 25-05, "Fabrication of ASME Code Items Prior to the Identification of an Owner/Licensee," Revision 0, for NRC review and endorsement (ML25192A124). The ASME Code, as incorporated into 10 CFR 50.55a, requires an Owner, which the Code defines as an applicant for a license or a licensee, for the fabrication of components meeting Code requirements, including long lead time ASME Code stamped components. ASME Code provisions require the Owner to apply its quality assurance requirements to the procurement of ASME Code stamped items. However, in recognition of emerging new business models for rapid, high-volume deployment of advanced reactors, the ASME developed Code Case N-883, "Construction of Items Prior to the Establishment of a Section III, Division 1, Owner." The NRC staff is continuing its review of the proposed NEI guidance and recognizes the importance of the Code Case to support the expedited construction of new Nuclear Power Plants, consistent with the ADVANCE Act and EOs. The NRC staff is developing interim staff guidance to clarify for the NRC staff and future applicants or holders of a COL or CP how the Code Case N-883 could be implemented, consistent with 10 CFR Part 50, Appendix B and 10 CFR Part 21, for ASME Code-stamped components fabricated before identification of an Owner. The staff anticipates issuing its guidance for public comment in June 2026 and issuing final guidance in September 2026. This approach is intended to support emerging business models while ensuring safety and that all applicable regulatory requirements are satisfied prior to component installation and use.

CONCLUSION:

The NRC staff will implement structured, risk-informed review processes that are consistent, predictable, and transparent to support completion of the NRC staff's determination on a license application within no more than 18 months from acceptance. To facilitate communication and planning, the NRC staff will leverage pre-application engagement, encourage early submission of regulatory engagement plans, and support applicant requests with timely responses to questions on information and documentation requirements. Integrated review teams will conduct safety, environmental, and security evaluations using the core team model (ML24156A109), supported by project management tools to coordinate milestones and resolve issues in real time. The NRC staff plans to maximize the use of experience from previous reviews to improve licensing efficiency, while ensuring all reviews meet relevant statutory and regulatory requirements. Additionally, inspection oversight for future large LWR construction will be conducted under the ARCOP.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection.



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Enclosures:

1. Regulatory Pathways for Referencing a Prior Licensing Action
2. Considerations for Terminated Combined Licenses
3. Pathways for Early Construction of Structures, Systems, and Components at a Production or Utilization Facility