



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

June 3, 2026

Mr. Ross Moore
Vice President of Regulatory and Oversight
Oklo Inc.
3190 Coronado Dr.
Santa Clara, CA 95054

SUBJECT: OKLO, INC. SUMMARY REPORT ON PRE-PHASE 2 COMBINED LICENSE
APPLICATION SUBMITTAL REGULATORY AUDIT

Dear Mr. Moore:

By letter dated February 21, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25052A168), Oklo indicated its intention to submit a combined license (COL) application in two phases in accordance with Title 10 of the Code of Federal Regulations (10 CFR) section 2.101(a)(5) and pursue readiness assessments for each phase. The staff held a readiness assessment for phase 1 and issued a report on July 7, 2025 (ML25178A078). In advance of phase 2 submittal, Oklo prepared background information on several areas it plans to address in its COL application and for which it is proposing alternative graded approaches to meeting regulatory requirements for power reactors.

The U.S. Nuclear Regulatory Commission (NRC) staff issued an audit plan to Oklo by letter dated September 2, 2025, outlining the proposed approach for conducting the pre-phase 2 COL application regulatory audit (ML25245A207). The audit entrance meeting was conducted on September 3, 2025. Following the initial set of audit meetings September 3-4, 2025, follow-up meetings were held on maximum hypothetical accident (MHA) (September 18) and quality assurance (September 22 and December 10).

Audit Approach

The purpose of this audit was for the NRC staff to gain a better understanding of Oklo's proposed licensing approaches through review of supporting documents and discussions with Oklo. The audit facilitated more effective and efficient exchange of information by allowing the NRC staff to review and discuss supporting material. The audit also provided an opportunity for NRC staff to identify potential information gaps that will need to be addressed in future submittals.

The audit followed the guidance in the Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, "Regulatory Audits" (ML19226A274). To support the NRC staff's audit, Oklo made documents on these topics available in an online reference portal. Consistent with the audit plan, the NRC staff shared technical concerns or major information gaps with Oklo as soon as practicable and Oklo offered initial responses on how it planned to address the staff concerns (e.g., presenting additional information in follow-up meetings).

The staff considered Oklo's description of the preliminary Aurora Powerhouse design and its proposals to address regulatory requirements, including some originally developed for large light water reactors. The staff also considered novel approaches that are under development for new technologies that are significantly different from those applied to the current operating fleet.

General Observations

In addition to the specific observations included in the enclosures to this letter, the NRC staff made several general observations regarding Oklo's preliminary phase 2 COL application including the following:

- Oklo provided an overview of the maximum hypothetical accident (MHA) to demonstrate compliance with 10 CFR 52.79(a)(1). The staff noted that additional information is needed to assess if the MHA analysis would be appropriately bounding. Oklo must demonstrate the validity and conservatism of all assumptions in the MHA, as appropriate. For example, if the MHA assumes a barrier (or set of barriers) is substantially intact to retain radionuclides, then the MHA is demonstrating the importance of those barrier(s) and would not be a reasonable justification to reduce the robustness of those barrier(s). Additionally, demonstration of "low consequence" via MHA analysis may not necessarily justify exemptions on its own; any exemptions need to be justified based on the applicable 10 CFR 50.12 or 52.7 criteria.
- Though not discussed during the audit, the staff notes that additional information is needed to support a future licensing application on how fires resulting from sodium leaks are prevented and mitigated.
- The staff held additional discussions with Oklo related to its proposed approach to quality assurance. NRC staff noted that more specific information is needed on how Oklo plans to meet 10 CFR Part 50 Appendix B. Oklo concluded that they prefer to continue discussions outside of this audit, such as in pre-submittal interactions on a Quality Assurance Program Description topical_report.

Next Steps

The NRC staff expects that Oklo will review the enclosure to inform pre-application activities for a future license application.

The NRC staff notes that, following engagement on the pre-phase 2 audit, Oklo informed the NRC of its plans to seek DOE authorization for the Aurora-INL project and requested NRC observation of that activity (ML26021A198). The NRC staff initiated an audit (ML26020A209) to review the documents submitted to DOE and observe DOE authorization activities. Oklo may have adjusted its design or licensing approach as part of the DOE authorization process, and the staff will provide the requested feedback on that activity in separate correspondence.

If you have any questions regarding this matter, please contact me at (301) 415-1322 or via email at Donna.Williams@nrc.gov.

Sincerely,

Donna Williams

Donna Williams, Senior Project Manager
Advanced Reactor Licensing Branch 1
Division of Advanced Reactors and Non-Power
Production and Utilization Facilities
Office of Nuclear Reactor Regulation

Project No. 99902095

Enclosures:

1. Audit Summary Enclosure (public)
2. Audit Summary Enclosure (proprietary)

cc: Oklo Powerhouse
via Gov Delivery

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ADAMS Accession Nos.:

Package: ML26058A398

Cover letter: ML26058A394

Enclosure 1: ML26058A393

Enclosure 2: ML26058A392 (proprietary)