

# **RIC 2006**

## **Session T1E**

### **Licensing Issues**

#### **Licensing and Risk Related issues within the Division of Risk Assessment**

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# Topics

- Extended Power Uprates and Risk
- Alternative Source Term (AST) Amendments
- Notices of Enforcement Discretion (NOED)

# Extended Power Upgrades and Risk

- Risk evaluations only needed for extended power upgrades (EPUs), which concern power increases above  $\approx 7\%$ .
- EPU submittals are reviewed using “Review Standard for Extended Power Upgrades,” (NRR RS-001, Matrix 13)

# Lessons Learned...Things to Consider in EPU Applications

- Initiating event impacts
- Success criteria impacts
- Human reliability analysis
- External event and shutdown risks need to be considered
- Quantitative results need interpretation

# Alternative Source Term (AST) Amendments

- Challenges associated with AST license amendments
  - Submittals deviate from Regulatory Guidance without appropriate technical justification
  - Revisions to amendments frequently result in reanalysis
- Steps taken to address the challenges:
  - Increased communication (starting early in process)
  - Improved internal processes
  - Issuance of RIS
  - Scheduled Workshop with Industry

# Notices of Enforcement Discretion

- Overview of process changes
- Key points for successful NOED interactions w/staff
- Prepare in advance