



Licensing Best Practices and Initiatives

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Overview

- What works well?
- What doesn't work well?
- What can prevent a clean start?



What Works Well

- Describing the change including current licensing basis and current licensing basis acceptance criteria
- Demonstrate adequate level of safety for the change
 - Analytical methods
 - Input parameters
 - Same method as the current licensing basis or NRC approved method
 - Provide results
 - Safety impact evaluation for administrative changes



What Works Well

- Provide level of detail so that NRC staff can make an independent assessment
- Fleet submittals for Improved Standard Technical Specification plants (ISTS)
- Submittals using Electronic Information Exchange
- Clearly identifying and justifying required plant specific deviations from CLIPs and TSTFs



What Does Not Work Well

- Requested approvals in less than 1 year
- Unidentified or Undocumented deviations from CLIPs and TSTFs
- Fleet submittals including both ISTS and non-ISTS plants
- Approved CLIPs and TSTFs that have subsequently engendered NRC staff concerns



What Does Not Work Well

- Not evaluating the impact of all changes
- Not ensuring that all assumptions and limitations of CLIPs, TSTFs, and Topical Reports are met
- Reliance on commitments where regulatory requirements are warranted
- Not establishing and meeting scheduled dates including implementation dates



What Can Prevent a Clean Start

- No Significant Hazards Consideration Determinations that do not address all changes
- Proprietary determination issues
- ADAMS acceptance issues
- Communication issues
- Precedent issues
- Evolving NRC staff positions



Comments and Questions