

## NRC Regulatory Information Conference

Industry Perspective on Changes  
during Construction

Russ Bell, NEI  
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### Preview

- Making changes under a Combined License
- Finalizing Licensing Basis Information
- Preliminary Acceptance Review (PAR) Option
- PAR Process Elements
- Part 52 Change Process Guidance
- Path forward




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### Making Changes Under a Part 52 Combined License

Licensing Basis Info	Change Process
<b>Standard Design Certification</b>	
Tier 1, including ITAAC	License Amendment and Exemption
Certain information designated Tier 2* ("Tier 2 Star")	License Amendment (most Tier 2* designations expire at first full power)
Tier 2 (FSAR-like info)	50.59-like process (includes severe accident considerations)
<b>Plant Specific Information</b>	
Plant specific ITAAC	License Amendment
Technical Specifications	License Amendment
FSAR	Applicable Part 50 process, e.g., 50.59, 50.54, etc.




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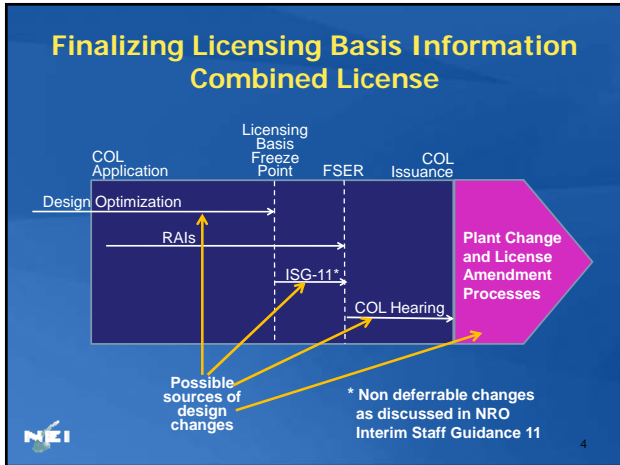
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### Finalizing Licensing Basis Information Combined License




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### Status of NRC Interactions on Changes during Construction

- NRC outlined workable approach last December
- Implementation details discussed in January
- Guidance under development

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### Essentials

- | <u>NRC</u>   | <u>Licensees</u>  |
|--|---|
| <ul style="list-style-type: none"> <li>▪ Thorough technical review of all LARs in accordance with NRC requirements</li> <li>▪ Timely notice of changes that may affect construction inspection activities</li> </ul> | <ul style="list-style-type: none"> <li>▪ Minimize uncertainty in construction schedules</li> <li>▪ Ability to install and test design changes at-risk pending NRC review of an LAR</li> </ul> |

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### Preliminary Acceptance Review

- Option within the LAR process during construction that allows licensees to proceed at risk to install and test design changes before an LAR is approved by the NRC



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### PAR Process Elements

- Licensee determines if an LAR is required
  - Based on 10 CFR 50.59-like or other change process; or
  - Change affects Tier 1 or Tier 2\* info



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### Communication

- Licensee discusses LAR needs w/NRC early as practical through normal lines of communication
  - Nature of change(s)
  - Planned technical content of LAR(s)
  - Expected LAR review schedule



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### Schedule Constraints

- Licensee identifies time constraints
  - When is LAR approval needed?
    - LARs must be approved before affected ITAAC may be closed
  - Is the change scheduled to be built before the LAR is expected to be approved?
    - If so, licensee may request an Preliminary Acceptance Review (PAR) from NRC




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### Prepare PAR Request

- Content of PAR request
  - Summary description of proposed design change
  - Reason for concluding an LAR is required
  - Impact of change on install and test schedules, and need-by date for PAR
  - Identification of new or modified ITAAC (if any) and estimated schedule for associated activities
  - Other content to be determined




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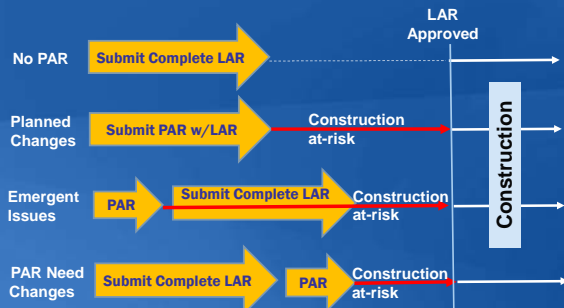
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### PAR Scenarios




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### NRC Response to PAR

- Separate PAR submittal, separate NRC response
- NRC PAR response will acknowledge and state that NRC has no objection to the licensee proceeding -- at risk -- with the specified construction
- NRC response time will be based on time constraints and priority indicated by the licensee

The PAR does not imply any NRC approval of the associated LAR



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### Construction At Risk

- Following issuance of an PAR, the licensee may install and test affected SSCs
- Construction is "at risk" because NRC may not approve the LAR
- If the LAR is denied, the licensee must restore SSCs to the approved design or an alternative acceptable to the NRC



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### Benefits of PAR Process

- Assures that NRC is notified and can adjust to inspection impacts
- Allows licensees to proceed with work -- at risk -- to maintain schedule
- No impact on LAR process
- Adaptable to emergent issues
- Promotes standardization



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### Part 52 Change Process Guidance

- PAR process is just one aspect of Part 52 change process guidance under development
- NEI 96-07, Appendix C will supplement existing NRC-endorsed guidance on 10 CFR 50.59 to address:
  - Tier 1, Tier 2\*, severe accident, aircraft impact
  - Issues unique to construction phase (e.g., PAR)
  - Other issues unique to new plants



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### Path Forward

- Develop guidance on PAR process
- Integrate PAR guidance into NEI 96-07, Appendix C, and request NRC endorsement
- Work with NRC toward a license condition to underpin the PAR process
- Applicant communications about expected LARs essential to allow NRC resource planning

PAR option needs to be available when the first COLs are issued later this year



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