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Enhanced Guidance to Part 52 Applicants

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WHAT ... is purpose of this staff initiative?

Regulatory Guide 1.206 - Combined License Applications for Nuclear Power Plants (2007)

Objective: Comprehensive revision to clearly articulate acceptable methods to 1) satisfy regulatory requirements and 2) support effective and efficient application reviews

- ✓ Application content & format
- ✓ Application-related regulatory topics
- ✓ Safety analysis report – detailed content & format

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Revision to Regulatory Guide 1.206

Scope:


- 10 CFR Part 52 applications – focus is Combined License
- Entire application – safety, environmental, other
- Lessons learned from prior applications
- Guidance for regulatory issues (e.g., electronic submittals, requests for additional information)
- Correlate with other guidance and Standard Review Plan
- Guidance related to Fukushima topics
- Expectations for high-quality applications

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WHY ... is there a need & why now? 

- NRC anticipates additional applications – including small modular reactors (SMRs)
- NRC intends more effective and efficient reviews
- Institutionalize lessons learned from prior and ongoing application reviews [New Reactor Licensing Process Lessons Learned Review: 10 CFR 52 (ML13059A239)]
- Some prospective applicants not previously experienced with Part 52



HOW ... the NRC staff's approach

- Revised RG 1.206 is “umbrella” guidance document
 - ✓ Integrate – not duplicate – applicable requirements/guidance
 - ✓ Pointers to requirements, policies, regulatory guides, interim guidance, staff instructions/directives
 - ✓ User-friendly
- Phased approach
- Staff inter-office working group
- Stakeholder (internal) alignment
- Adhere to NRC's principles of good regulation
 - e.g., public interactions – initial public meeting Sep 17, 2014



Regulatory Guide 1.206 [Revision]

A. Introduction
B. Discussion
C. Guidance
C.1 Applications – Standard Format & Content
Part 1 – through – Part 11
C.2 Applications – Regulatory Topics
e.g., Pre-application Activities; Application Electronic Submittal; Application Acceptance Review; ... additional topics
Appendices: Safety Analysis Reports – Standard Format & Content
Appendix A – Combined License Final Safety Analysis Report (FSAR)
Appendix B – Early Site Permit Site Safety Analysis Report (SSAR)
Appendix C – Standard Design Certification FSAR
Appendix D – Combined License FSAR for applications referencing Standard Design Certification and/or Early Site Permit




“Parts” of the Application


C. Guidance

C.1 Applications – Standard Format & Content

- Part 1 – General & Financial Information
- Part 2 – Safety Analysis Report
- Part 3 – Environmental Report
- Part 4 – Technical Specifications
- Part 5 – Emergency Plans
- Part 6 – Security Plans
- Part 7 – Exemptions / Departures / Variances
- Part 8 – License Conditions & Inspections, Tests, Analyses, & Acceptance Criteria (ITAAC)
- Part 9 – Withheld Information
- Part 10 – Quality Assurance Program Description
- Part 11 – Supplemental Information



Application Part	Combined License	Early Site Permit	Standard Design Certification
Transmittal Letter	✓	✓	✓
Part 1:	✓	✓	✓
Part 2:	✓	✓	✓
Part 3:	✓	✓	✓
Part 4:	✓	Not Applicable	✓
Part 5:	✓	Optional	Not Applicable
Part 6:	✓	Not Applicable	Not Applicable
Part 7:	✓	Optional	Optional
Part 8:	✓	Optional	✓
Part 9:	✓	✓	✓
Part 10:	✓	✓	✓
Part 11:	Optional	Optional	Optional



PART 5 – Emergency Plans

Emergency plans and relevant supplemental information compose Part 5 of the application ...

- > Combined license requirements ... §52.79(a)(21)
- > Early site permit requirements ... §52.17(b)
- > Standard design certification ... Part 5 is not applicable

Part 5 should include the following:

- ✓ A table listing the titles of documents included herein
- ✓ The applicant's onsite emergency plan ...
- ✓ ...

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C.2 Applications – Regulatory Topics

- Pre-application Activities
- Pre-application Readiness Assessment
- Small Modular Reactors and Design-Specific Review Standards
- Application Acceptance Review
- Application Electronic Submittal
- Limited Work Authorization
- Requests for Additional Information (RAI)
- Operational Programs for COLs
- ...

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Pre-application Readiness Assessment

Overview

- assessment of readiness to tender an application under Part 52
- type of voluntary pre-application activity – mutually beneficial
- planning and scheduling coordinated with prospective applicant

Guidance

- ... should support the NRC staff's planning, preparations, and conduct of the assessment
- ... should have familiarity with the NRC's Office of New Reactors Office Instruction NRO-REG-104, "Pre-application Readiness Assessment," (ML14079A197) ... publicly available

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Appendices: Safety Analysis Reports

Appendix A – Combined License FSAR 

- Detailed guidance for content and format
- Update of RG 1.206 (2007)
- Correlates to Standard Review Plan

Appendix B – Early Site Permit SSAR

Appendix C – Standard Design Certification FSAR

Appendix D – Combined License FSAR for application referencing Standard Design Certification and/or Early Site Permit

Safety Analysis Reports – scope/content

Appendix D = App A modified to incorporate by reference ESP / DC

	Combined License [Note 1]	Early Site Permit [Note 2]	Standard Design Certification [Note 3]	COL Referencing ESP and/or DC [Notes 4 & 5]
Safety Analysis Report Chapters	FSAR	SSAR	FSAR	FSAR
Chapter 1	✓	✓	✓	✓
Chapter 2	✓	✓	✓	✓
Chapter 3	✓	[limited scope]	✓	✓
Chapter 4	✓	Not Applicable	✓	✓
Chapter 5	✓	Not Applicable	✓	✓
Chapter 6	✓	Not Applicable	✓	✓
Chapter 7	✓	Not Applicable	✓	✓
Chapter 8	✓	Not Applicable	✓	✓
...				

SAR Chapter/Section Format

Chapter X
Section X.Y
Content

- Reference to regulatory requirements
- Pointers to related and/or detailed guidance
- Correlate with content of Standard Review Plan
- Regulatory terminology
 - ✓ applicant "shall" ... [regarding regulatory requirements]
 - ✓ applicant "should" ... [regarding regulatory guidance]
 - ✓ applicant "may" ... [regarding guidance options]



THANK YOU!

Regulatory Guide 1.206 (rev) – “Applications for Licensing Commercial Nuclear Power Plants”

Public Meeting (next): March 31, 2015

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