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2015



Effective Pre-Application Activities – Lessons from APR1400 Experience

Samuel Lee
Licensing Branch 2
Office of New Reactors
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Background

- APR1400 Design Certification Application tendered on September 30, 2013
- Application was not docketed; NRC response letter* to KHNP and KEPCO stated:
 - "... a majority of the chapters and sections contain sufficient information to conduct the review."
 - However, there were a few design areas deemed to be insufficient; led to NRC's non-docketing decision

*(12/19/2013, ML13351A417)

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Pre-Application Activities


- Applicant committed to addressing in pre-application space the issues that led to the decision not to docket the application; developed 10-month pre-application activities schedule
- Held seven pre-application public meetings through October 2014; week-long meetings, multiple technical topics
- Last public meeting in October 2014 – applicant provided summary briefing of how the issues were addressed; followed by NRO senior management feedback

 **RIC** 2015 

Since Pre-Application Activities...

- DC Application re-submitted December 23, 2014
- Processing of application in Agency-wide Documents Access and Management System (ADAMS): December 23, 2014 - January 5, 2015
- 60-Day Acceptance Review
 - Started January 5, 2015
 - Applied current Office Instruction on Acceptance Review

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Part 52 Licensing Review Lessons*

- High-quality application: significant contributor to overall project performance
- Early identification and timely resolution of complex technical issues minimize impacts on the review schedules

*New Reactor Licensing Process Lessons Learned Review: 10 CFR Part 52, April 2013, ML13059A239

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Lessons Implemented for APR 1400

- NRC staff engaged applicant with regards to the best timing for pre-application audits. Used audits to evaluate level of detail of application
- NRC staff adhered more strictly to acceptance review criteria for new applications
- Addressed timely resolution of potential complex technical issues to reduce schedule risk

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Recipe for Productive Pre-Application Activities

- Preparation is key; focus on specific topics; provide detailed design information
- Preview of presentation material by staff leads to better public meeting discussion and clearer understanding and promotes quicker resolution of issues
- Public meetings should be initiated well in advance to allow for sound planning
- Readiness audits should be done well in advance of the application submittal to allow for any needed improvement
- Communicate³; commit to mutual understanding

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