

NRC Regulatory Information Conference

Industry Perspective on Changes
during Construction

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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

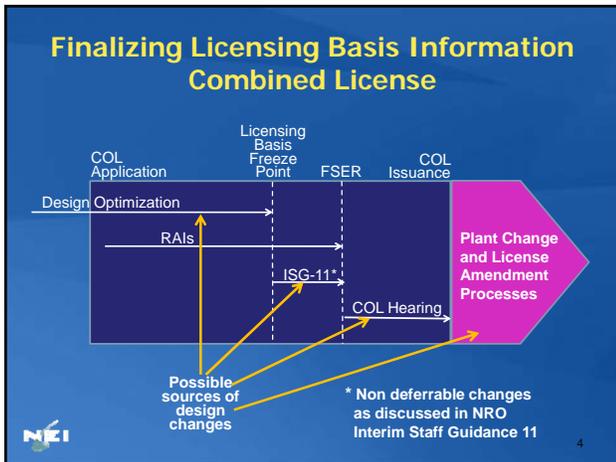


Making Changes Under a Part 52 Combined License

Licensing Basis Info	Change Process
Standard Design Certification	
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)
Plant Specific Information	
Plant specific ITAAC	License Amendment
Technical Specifications	License Amendment
FSAR	Applicable Part 50 process, e.g., 50.59, 50.54, etc.



Finalizing Licensing Basis Information Combined License



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

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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



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



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



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

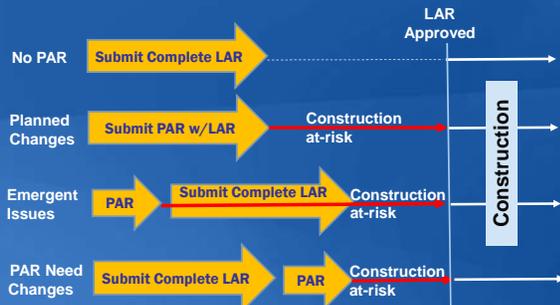


Prepare PAR Request

- 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



PAR Scenarios



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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