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## New Reactors Licensed Under 10 CFR Part 52: The End Game – Coordinating Rules, Licenses and Mandatory Hearings

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March 15, 2012



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## Steps to Design Amendment Final Rule

| AP1000® Design Certification Rulemaking Milestones               | Date         |
|--|--------------|
| Westinghouse Submitted DC Amendment Application (DCD Rev 16)     | 05/26/07     |
| NRC Issued Proposed AP1000 Rule to Commission                    | 01/03/11     |
| AP1000 Proposed Rule Published in Federal Register               | 02/24/11     |
| NRC Performed Confirmatory Information Review                    | 12/10 – 5/11 |
| Westinghouse Submitted DCD Rev 19 Update (w/ Conforming Changes) | 06/13/11     |
| Final Safety Evaluation Report (FSER) Completed                  | 08/05/11     |
| ACRS Reaffirmed Safety of AP1000 Design Amendment                | 09/19/11     |
| NRC Staff Issued Final AP1000 Rule to Commission                 | 10/18/11     |
| Commissioners Affirmed Vote on Final AP1000 Rule                 | 12/22/11     |
| Design Amendment Rule Published in Federal Register              | 12/30/11     |
| Design Amendment Rule Effective                                  | 12/30/11     |



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## Parallel Processes Created Significant Challenges

- Off-shore Licensing
- Off-shore Construction
- Design Certification Rulemaking
- Combined Construction and Operating License



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## Managing Parallel Processes Requires Vigilance and Discipline

- Key Challenges
  - Design control
  - Evolving regulatory views
  - Communication and coordination with stakeholders
  - Public transparency
- Key Lessons Learned
  - Rigorous project management – all stakeholders
  - Aggressive issue management – small issues can quickly become big
  - Robust and vigilant design control / ISG-11 processes
  - Frequent stakeholder alignment – up, down and across
  - Flexible regulatory review approaches – Chapter 23
  - Anticipate, embrace and plan for public meetings



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## Getting to Closure: Don't Underestimate the Final 5%

- Key Challenges
  - Last issues are often left to the end for a reason
  - No more opportunities to "kick the can" down the road
  - What previously seemed minor can become significant in the end
  - NRC inspections – EDVI, Appendix B, aircraft impact, etc.
  - Differing professional opinions
- Key Lessons Learned
  - Do not relax project management, issue management, design control or stakeholder alignment
  - Do not overlook ACRS
  - Aggressively anticipate and plan for non-technical "cleanup" – Tier 2 designations, figures, IBR
  - Anticipate and plan for competing demands of NRC inspections
  - Aggressively and transparently address differing professional opinions



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