

## **Key COLA Topics for Discussion with COLTF (11/8-9) and NRC (11/9)**

### **1. Overview COL Application (COLA) Contents, including FSAR**

- NEI 04-01 draft Table of Contents
- “Base case” COL scenario is DC plus ESP
- Revised COLA contents Venn diagram
  - a. Addresses NRC staff comments of 1/19/04
  - b. Need for separate report (in addition to plant-specific DCD/FSAR) on departures from generic DCD
- FSAR = plant-specific DCD plus site-specific info
- Treatment of interface requirements and COL items
- General structure of NEI 04-01 guidance
  - a. Regulatory requirements
  - b. Guidance w/emphasis on COL applicant scope of site-specific info
  - c. Guidance on special topics, including
    - i. ESP – COL interface issues
    - ii. site-specific design ITAAC
    - iii. plant-specific technical specifications
    - iv. operational reliability assurance program
    - v. Chapter 19 and the PRA
  - d. Identification of proposed rule changes and unresolved policy/process issues that may affect COLA guidance
- Level of detail for FSAR info
- Expectations regarding NRC staff review of “base case” FSAR info

### **2. Scope and Level of Detail of Plant-Specific Design Description & ITAAC**

- COLA FSAR will provide site-specific design info beyond the scope of a referenced design certification
- Total scope of COLA design info (standard plus site-specific) will be consistent with SRP and recent FSARs
- Level of detail for site-specific design information will be consistent with
  - a. generic DCD (e.g., commensurate with safety significance)
  - b. analogous information approved by the NRC for current FSARs
- Plant-specific design ITAAC will
  - a. look like analogous design certification ITAAC
  - b. be consistent with ITAAC general principles, eg,
    - i. risk informed
    - ii. focus on salient design and performance criteria
- Criteria for defining the required scope of plant-specific design ITAAC

### **3. Operational Reliability Assurance Program and COL DRAP**

- COL applicant will implement DRAP to support detailed engineering and procurement based on a referenced design certification
- QA, Maintenance and Configuration Control programs will constitute ORAP, consistent with draft SRP 17.4

#### **4. Development of Plant-Specific Technical Specifications (PSTS)**

- Exemption process for departures from PSTS
- Clarification regarding statement 9.b on page 15 of draft SRP 14.3: "Technical specifications are required to be in the DCD but are treated like conceptual design information..."
- Overview planned NEI 04-01 guidance on developing PSTS based on generic DCD TS, eg, to reflect
  - a. actual system setpoints
  - b. risk-informed improvements
  - c. conformance with 10 CFR 50.36 criteria
  - d. other updates
- Expected completion of certain aspects of PSTS post-COL
- Submittal of PSTS supporting documents post-COLA, eg, COLR, ODCM, etc.

#### **5. FSAR Chapter 19 and the PRA**

- Plans for streamlined Ch. 19 of the COLA FSAR (different from format and content of DCD) based on
  - a. Availability of new standards, eg, RG 1.200, that have been developed to support operating reactors
  - b. Different purpose/objectives for COL vs. DC
  - c. More consistent with operating plant FSARs, which do not describe their PRAs
  - d. Proprietary/safeguards concerns about PRA info
  - e. COLA will incorporate by reference the generic DCD

[ See attached preliminary generic outline for a COLA Chapter 19 ]

- Plant-specific PRA
  - a. Available for NRC review/audit, or
  - b. Submit to NRC separately from the FSAR
- Definition and expected approach for developing an updated plant-specific PRA based on the design PRA for a standard plant
- Proposed guidance on quality and scope of updated plant-specific PRA
  - a. Internal events and external events consistent with design certification and evolving PRA standards
  - b. Level 2
  - c. ASME Quality Category 2\* (\*except for plant operating history)
- Nature of expected NRC staff review at COL of an updated p-s PRA
  - a. Use of RG 1.200 for Level 1 internal events and LERF
  - b. Other?
- Related topics
  - a. Timing of completion of updated PRA
  - b. Treatment of PRA as "classified/safeguards/sensitive unclassified/proprietary" information
  - c. PRA maintenance and update guidance consistent with NEI-00-04, RG 1.200 and 10 CFR 50.69

## **6. FSAR Chapter 18 (Human Factors Engineering)**

- AP1000 example being used as basis for COLA guidance
- Planned guidance for NEI 04-01 consistent with AP1000 HFE DAC
  - a. guidance on all 12 HFE elements of NUREG-0711
  - b. template for conduct of HFE task analysis
- Expectations about what will be done/addressed at time of COLA versus after the COL is issued
- Completion of ITAAC/DAC prior to COL consistent with proposed rule change (Proposed 10 CFR 52.211(d)(2))

## **7. COL Application Treatment of Operational Programs**

- Expectation of no ITAAC on operational programs (EP is a special case)
- Scope of programs to be described in the FSAR will be consistent with NRC FSAR content regulations, the SRP and recent FSARs
- Descriptions of other required programs to be maintained on site
- Programs to be described at a functional level consistent with May 14, 2004, Commission SRM on PITAAC
  - a. Equivalent in substance to recent FSARs, including description of how programs conform or will conform with NRC requirements, the SRP and applicable regulatory guidance
  - b. Including information on the timing of program implementation
- NEI 04-01 to provide examples of operational program descriptions

## **8. NRC Staff Review Guidance for COL Applications**

- a. Mixed bag of outdated, draft and recently revised SRPs
- b. Bulk of SRP does not reflect the differences between requirements for COLA under Part 52 versus requirements under the old Part 50 process
- c. Compliance with 10 CFR 50.34(h) is problematic due to SRP condition and DC/ESP interfaces
- d. One option pending complete SRP update is to apply current SRPs on a case basis based on the applicability of the review criteria to COL applicants under Part 52 and the information expected to be available in the pre-COL time frame
- e. Prioritization of ongoing SRP update per SECY-04-0144 and LIC-200
  - i. Is a review standard on COLA contemplated?
  - ii. Is priority given to COLA scope SRPs? (ie, beyond design certification, beyond ESP)
- f. Preference is for development of RS-003 for review of COLAs
  - i. NEI 04-01 and associated interactions would provide input to parallel staff development of COLA review standard
  - ii. RS-003 focus would be on COLA scope only (ie, beyond design certification, beyond ESP)

Attachment for Discussion Item #5  
**DRAFT PRELIMINARY Outline for COLA FSAR Chapter 19**  
**(for purpose of discussion w/NRC on Nov. 9 only)**

<b>Section</b>	<b><i>FSAR Chapter 19 – Plant-Specific Probabilistic Risk Assessment</i></b>
<b>19.1</b>	<b><i>Introduction</i></b>
<b>19.1.1</b>	<b><i>Objectives</i></b> 1. <i>Design-specific DCD objectives adapted for plant specific licensing and operation</i> 2. <i>Understand any differences in plant-specific and design-specific PRA insights and conclusions and disposition if significant</i> 3. <i>Support other areas included in the DCD (eg, ORAP) using PRA as an input</i> 4. <i>Upgrade, as appropriate to current standards and guidance</i> 5. <i>Address COLA Items</i>
<b>19.1.2</b>	<b><i>Format and Content of Section 19</i></b>
<b>19.2</b>	<b><i>Scope and Approach to development of plant-specific PRA</i></b>
<b>19.2.1</b>	<b><i>Scope</i></b>
<b>19.2.2</b>	<b><i>Approach</i></b>
<b>19.3</b>	<b><i>COL Items</i></b>
<b>19.3.1</b>	<b><i>Item 1</i></b>
<b>19.3.2</b>	<b><i>Item 2</i></b>
<b>19.3.3</b>	<b><i>Etc.</i></b>
<b>19.4</b>	<b><i>Results</i></b>
<b>19.4.1</b>	<b><i>Results of Comparison of plant-specific PRA with design PRA</i></b>
<b>19.4.2</b>	<b><i>Insights from plant-specific PRA</i></b>
<b>19.4.3</b>	<b><i>Other Results</i></b>
<b>19.5</b>	<b><i>Support of plant programs. eg for D-RAP, O-RAP, MR Technical Specifications, HRA, etc.,</i></b>
<b>19.6</b>	<b><i>Maintaining the Plant-specific PRA</i></b>
<b>19.7</b>	<b><i>References</i></b>