

C.IV.7. Pre-Application Activities

The NRC staff believes that addressing certain topics with COL applicants will benefit both the staff and the applicants. The staff collectively calls these interactions “pre-application activities.” Despite the inherent benefits, COL applicants are not required to engage in pre-application activities.

Pre-application activities should not focus on what can be done prior to the submission of a COL application. Rather, these interactions should focus on what would be most beneficial to the review, and what would achieve the best and most efficient use of staff and applicant resources. Toward that end, the staff categorizes pre-application activities as (1) those that support the entire COL application, and (2) those that specifically support the environmental review, as discussed in the following sections.

C.IV.7.1 Pre-Application Activities that Support the COL Application

C.IV.7.1.1 COL Applications Referencing a Certified Design

Pre-application activities that support a COL application referencing a certified design should focus on the following topics:

- potential deviations from the certified design
- process and schedule for completing inspections, tests, analyses, and acceptance criteria (ITAAC) associated with the design acceptance criteria (DAC)
- plans for addressing COL action/information items in the NRC’s final safety evaluation report (FSER)

C.IV.7.1.2 COL Applications Referencing an Early Site Permit

Pre-application activities that support a COL application referencing an early site permit (ESP) should focus on the following topics:

- potential deviations from the ESP
- plans for addressing COL action items and conditions in the permit

C.IV.7.1.3 All COL Applications

Pre-application activities that support a COL application should focus on the following topics (regardless of whether the application references a certified design or an ESP):

- exemptions from the regulations (other than deviations from the certified design)
- deviations from staff guidance
- potential policy issues
- fabrication schedule for long-lead-time components
- schedule for site characterization activities
- plans to request limited work authorization
- other site work to support plant construction
- source of historical site information for geology, meteorology, and socio-economic data
- quality assurance program
- design reliability assurance program
- analysis needed to support offsite power analysis with RTO
- plans for interfacing with other Federal, State, and local agencies and/or officials
- relationship between the COL application and other licensing activities (such as review of a design certification)

C.IV.7.2 *Pre-Application Activities that Support the Environmental Review*

C.IV.7.2.1 Alternative Sites

Pre-application activities that support the environmental review should include the following interactions related to alternative sites:

- Review the process for selecting the alternative sites and then narrowing the selection to the proposed site.
- Visit the proposed and alternative sites and gather reconnaissance-level information. Identify any issues and concerns related to each site. For existing sites, the site visit may include the transmission corridors.

C.IV.7.2.2 Pre-Application Monitoring

Pre-application activities that support the environmental review should include the following interactions related to pre-application monitoring:

- Obtain information regarding the applicant's monitoring-related plans, and compare those plans to the NRC's environmental standard review plan (ESRP) guidance in NUREG-1555, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants," to identify any apparent discrepancies.
- Observe the applicant's implementation of portions of the monitoring programs.

C.IV.7.2.3 Federal, State, Tribal, and Other Entities

Pre-application activities that support the environmental review should include the following interactions related to Federal, State, Tribal, and other entities:

- Identify the key participants among the external organizations (e.g., cognizant Federal agencies, State agencies, local government officials, etc.) at the proposed site.
- Meet with appropriate representatives of external government organizations that have a potential role in the review process. Explain the NRC's role and process. Identify any issues of concern to these organizations, as well as any likely concerns related to the permits that will be required.
- Work through the NRC's Office of the General Counsel to establish memoranda of understanding (MOUs) with selected organizations, as appropriate.

C.IV.7.2.4 Initial Data Collection

Pre-application activities that support the environmental review should include the following interactions related to initial data collection:

- For selected areas in which data are readily available from existing sources, collect data that will be needed for the review. Examples would include many portions of the socioeconomics review, cultural resources (through the State or Tribal historic preservation officer), and threatened and endangered species (from the Fish and Wildlife Service and/or National Marine Fisheries Service).
- As sections of the application become available, take an initial look at them on-site or at the applicant's offices. Identify any inconsistencies between these sections and the ESRP.

