

Licensing Basis Change Criteria For Discussion Purposes – 06/06/2012

Type of RAI Responses That Should not Require Licensing Basis Changes:

- RAI relates to previous RAI that was part of NRC's ESBWR review (e.g., response provides information that NRC reviewed previously as RAI or Audit Comment; response provides further explanation of an item, but the item is already part of licensing basis).
- RAI related to a concern identified in EPU review(s), but response explains why item (1) is not directly related to ESBWR or (2) is insignificant to the ESBWR approach/methodology.
- RAI response is related to detailed design and (1) does not relate to item in current licensing basis, or (2) does not significantly impact an item in current licensing basis.
- RAI relates to new information, but new information (1) is not at the level of information included in the licensing basis; (2) does not result in licensing basis information being incorrect; or (3) does not invalidate related information in NRC FSER.
- RAI response further justifies or explains information in the licensing basis, but does not result in information in the licensing basis being incorrect or incomplete.

Type of RAI Responses That May Require Licensing Basis Changes:

- RAI response further justifies or explains information in the licensing basis, and could result in information in the licensing basis being incorrect or incomplete.
- RAI response providing clarifying information and licensing basis contains information that may be contrary to the response.
- RAI relates to a "significant" error in the licensing basis (i.e., leaving it out or not making a change would result in a safety concern).
- RAI relates to changes needed to ensure compliance with NRC regulations.
- RAI relates to changes needed to support other licensing-basis documents (e.g., conforming changes to information in the FSAR supporting technical specifications).
- RAI relates to significant technical corrections associated with the design or program described in the licensing document (i.e., if not changed, would preclude operation within the bounds of the licensing basis, as opposed to proposed alternatives to the described design or program).
- RAI relates to changes needed to address a significant vulnerability identified by probabilistic risk assessments (PRAs) or other studies (e.g., a change in a PRA insight).