

# **GLE Commercial Facility Mandatory Hearing**

**ASLB Presentation Topic #'s 4.A., 4.B., & 4.C.**

**Tracking and Implementation of Applicant Commitments**

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# Overview

- Commitments and Regulatory Requirements (4.A.)
- GLE's Commitment Tracking and Implementation Process (4.B.)
- Detecting and Correcting Noncompliances (4.B.)
- Preparation for the NRC Operational Readiness Review (ORR) (4.C.)

# Commitments and Regulatory Requirements (4.A.)

## Regulatory Requirements

- Local, State, Federal, and International laws that are applicable to GLE's activities

## License Conditions

- Imposed by regulation
- Proposed by NRC staff

## Commitments

- Promise to perform an action that may be tied to a regulatory requirement
- Two types: mandatory and voluntary

# Commitments and Regulatory Requirements

## Mandatory Commitments

- Required by a regulatory agency and include compliance with license conditions

## Voluntary Commitments

- Selective actions generally above and beyond those required by applicable regulations

## Mitigation Measures

- Subset of commitments made to minimize impacts on the environment

# Commitments and Regulatory Requirements

## Changes to Commitments

- NRC approval is required before making changes to the License Application that:
  - Decrease effectiveness of its commitments;
  - Conflict with a license condition; or
  - Require prior approval under 10 CFR § 70.72
- If NRC approval is required, GLE will submit a license amendment request
- If NRC approval is not required, GLE will submit a summary of the changes

# GLE's Commitment Tracking and Implementation Process (4.B.)

## Compliance Checklists

- Finalizing checklists to track and implement current commitments, including license conditions and industry codes and standards
- Functionality of Checklists
  - Maps commitments and license conditions to regulatory requirements and GLE procedures
  - Details actions and responsible individuals, which are tied to an electronic calendar system, with automated reminders
- Will be made available for NRC review

# GLE's Commitment Tracking and Implementation Process

New or modified regulatory requirements and guidance

- GLE has adopted procedures for reviewing, tracking, and implementing new or modified regulatory guidance and requirements

Implementing Voluntary Commitments

- Determine feasibility according to five identified factors
- Whether feasible or not, will note the decision in the compliance checklists

# Detecting and Correcting Noncompliances (4.B.)

## Corrective Action Program (CAP)

- Captures broad range of issues, including improper implementation of commitments and noncompliances
- Primary goal is to improve quality and performance

## Self-Assessment Program

- Primary method for proactively identifying noncompliances for inclusion in the CAP
- GLE will conduct periodic assessments and audits of various programs and functions



# Detecting and Correcting Noncompliances

## Handling Noncompliances

- Potential noncompliances will be evaluated in accordance with Reporting Procedures
- Initiate corrective action request in the CAP
- Possibly conduct an incident investigation to assess the validity of data, implement corrective action plans, and ensure regulatory agencies are notified as appropriate

# Preparation for the NRC ORR (4.C.)

GLE understands that the NRC will perform an ORR before beginning operations

GLE will perform internal readiness reviews

- Conducted well before the ORR
- Multi-disciplinary team
- Use of NRC inspection manual and other guidance documents