

GLE Commercial Facility Mandatory Hearing

Licensing an Evolving Design (Topic 2.B.)

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Contents

- Level of Design
- Configuration Management Program
- NRC-Approved Change Process Criteria

Level of Design

- Level of design sufficient for performance of safety review, development of ISA and definition of safety basis
- Design based on conservative and anticipated bounding assumptions
- Staff has determined that level of design is adequate for its safety review

Configuration Management Program

- Formal process in place per 10 CFR 70.72, LA Section 1.2.5.5
- Potential design changes require a change request (CR)
- CRs reviewed against NRC-approved change process criteria to determine if prior NRC approval is required

NRC-Approved Change Process Criteria

- LA Section 1.2.5.5 criteria
- 10 CFR 70.72 criteria
- Based on the criteria, design changes consistent with the established safety basis are bounded and there are no safety implications
- Changes outside those bounds require prior NRC approval before implementation
- Evolving design will be properly managed within the bounds of the existing design and when applicable, NRC prior approval will be sought