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Nuclear Power Plants  
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Cranberry Township, Pennsylvania 16066  
USA

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U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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Your ref: ML13263A227  
Our ref: SMR\_NRC\_000033/ALNRC00062

January 31, 2014

**Subject: Response to NRC Regulatory Issue Summary 2013-18, "Licensing Submittal Information and Design Development Activities for Small Modular Reactor Designs"**

Attached please find the Westinghouse Electric Company (Westinghouse) and Ameren Missouri (Ameren) response to the subject NRC Regulatory Issue Summary (RIS) 2013-18, "Licensing Submittal Information and Design Development Activities for Small Modular Reactor Designs," dated November 15, 2013.

Ameren and Westinghouse continue to view the Small Modular Reactor (SMR) plant design as both an important technical advancement for the electric power industry and a significant stimulant to the future economic growth of the country. Our response to the subject RIS includes the current status of the on-going design, engineering, and licensing needs that comprise the Westinghouse SMR design project's essential foundation. As additional information becomes available we will continue to update the NRC on the status of our SMR activities and the regulatory planning needs identified in the subject RIS.

Pursuant to 10 CFR 50.30(b), proprietary and non-proprietary versions of the response is submitted as Enclosures 3 and 4. Enclosure 1 is one copy of the Application for Withholding, AW-14-3876 (non-proprietary). Enclosure 2 is one copy of the associated Affidavit with Proprietary Information Notice and Copyright Notice (non-proprietary).

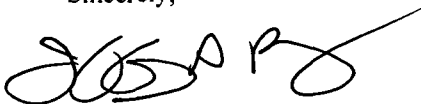
This submittal contains proprietary information of Westinghouse Electric Company, LLC. In conformance with the requirements of 10 CFR Section 2.390, as amended, of the Commission's regulations, we are enclosing with this submittal an Application for Withholding and an Affidavit. The Affidavit sets forth the basis on which the information identified as proprietary may be withheld from public disclosure by the Commission. The information being redacted is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public.

Correspondence with respect to the Affidavit or Application for Withholding should reference AW - 14-3876 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company LLC, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania, 16066.

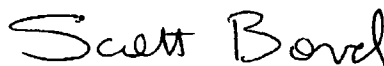
D104  
NRD

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



Jeff Benjamin,  
Sr. Vice President  
Regulatory Affairs  
Westinghouse Electric Co.  
Tel: 412-374-6655



Scott Bond  
Director, Nuclear Development  
Ameren Missouri  
Tel: 573- 676-8519

/Enclosures

1. AW-14-3876 "Application for Withholding Proprietary Information from Disclosure," dated January 31, 2014
2. AW-14-3876, Affidavit, Proprietary Information Notice, Copyright Notice dated January 31, 2014
3. Response to NRC Regulatory Issue Summary 2013-18, "Licensing Submittal Information and Design Development Activities for Small Modular Reactor Designs" (Proprietary)
4. Response to NRC Regulatory Issue Summary 2013-18, "Licensing Submittal Information and Design Development Activities for Small Modular Reactor Designs" (Non-Proprietary)

cc: M.E. Mayfield  
A. Bradford  
A Costa

(NRC)  
(NRC)  
(NRC)

January 31, 2014

ENCLOSURE 1

AW-14-3876

APPLICATION FOR WITHHOLDING  
PROPRIETARY INFORMATION FROM DISCLOSURE



Westinghouse Electric Company  
Nuclear Power Plants  
1000 Westinghouse Drive  
Cranberry Township, Pennsylvania 16066  
USA

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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e-mail: sisk1rb@westinghouse.com

Your ref: ML13263A227  
Our ref: AW-14-3876

January 31, 2014

APPLICATION FOR WITHHOLDING PROPRIETARY  
INFORMATION FROM PUBLIC DISCLOSURE

Subject: Response to NRC Regulatory Issue Summary 2013-18, "Licensing Submittal Information and Design Development Activities for Small Modular Reactor Designs" (Proprietary and Non-Proprietary)

The Application for Withholding is submitted by Westinghouse Electric Company LLC (Westinghouse), pursuant to the provisions of Paragraph (b) (1) of Section 2.390 of the Commission's regulations. It contains commercial strategic information proprietary to Westinghouse and is customarily held in confidence.

The proprietary material for which withholding is being requested is identified in the proprietary version of the subject response. In conformance with 10 CFR Section 2.390, Affidavit AW-14-3876 accompanies this Application for Withholding, setting forth the basis on which the identified proprietary information may be withheld from public disclosure.

Accordingly, it is respectfully requested that the subject information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to this Application for Withholding or the accompanying affidavit should reference AW-14-3876 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company LLC, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania, 16066.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Robert B. Sisk'.

Robert B. Sisk  
Acting Director, Small Modular Reactor

AW-14-3876  
January 31, 2014

ENCLOSURE 2

AFFIDAVIT

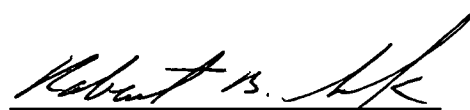
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS


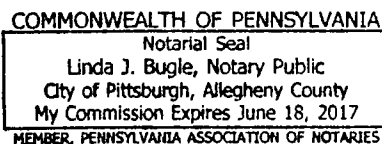
COUNTY OF BUTLER:

Before me, the undersigned authority, personally appeared Robert B. Sisk, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



Robert B. Sisk  
Acting Director, Small Modular Reactor

Sworn to and subscribed  
before me this 31<sup>st</sup> day  
of January 2014.

  
Notary Public

- (1) I am Acting Director, Small Modular Reactor, Westinghouse Electric Company LLC (Westinghouse), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse "Application for Withholding" accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
  - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
  - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of

Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
- (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
- (f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Westinghouse system which include the following:

- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
- (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
- (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.



- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
  - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
  - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in attachment to SMR\_NRC\_000033/ALNRC00062, Response to NRC Regulatory Issue Summary 2013-18, "Licensing Submittal Information and Design Development Activities for Small Modular Reactor Designs", to the Document Control Desk.

This information is part of that which will enable Westinghouse to:

- (a) Manufacture and deliver products to utilities based on proprietary designs.
- (b) Advance the SMR Design and reduce the licensing risk for the application of the SMR Design Certification

- (c) Determine compliance with regulations and standards
- (d) Establish design requirements and specifications for the system.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for purposes of plant construction and operation.
- (b) Westinghouse can sell support and defense of safety systems based on the technology in the reports.
- (c) The information requested to be withheld reveals the distinguishing aspects of an approach and schedule which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

### **PROPRIETARY INFORMATION NOTICE**

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

### **COPYRIGHT NOTICE**

The reports transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in these reports which are necessary for its internal use in connection with generic and plant-specific reviews and approvals as well as the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation subject to the requirements of 10 CFR 2.390 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of these reports, the NRC is permitted to make the number of copies beyond those necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

January 31, 2014

ENCLOSURE 4

Response to NRC Regulatory Issue Summary 2013-18, "Licensing Submittal Information and Design  
Development Activities for Small Modular Reactor Designs"

(Non-Proprietary)



Enclosure 4

**Response to RIS 2013-18, "Licensing Submittal Information  
and Design Development Activities for Small Modular Reactor Designs"**

**Design and Licensing Submittal Information**

- When (month and year) are applications planned for design-related applications and what NRC action will be requested (i.e., a DC, DA, ML, or a COL that does not reference a DC or DA)?

Response: In light of several recent industry initiatives including the impact of ITAAC, the Phase Submittal of Design Certification Applications, and the current NRC initiative to revise the DCA acceptance guidelines (OI-NRO-100) coupled with the recent announcement by the DOE regarding the Department's selection of cost-shared recipients under FOA DE-FOA-0000800, "Cost-Shared Development of Innovative Small Modular Reactor Designs", Westinghouse is re-assessing its design certification application submittal schedule. Because the Westinghouse SMR program continues to be a crucial part of our current and future business strategy and goals for next-generation nuclear technology, Westinghouse's original submittal date of [ ]<sup>a,c</sup> is being revised and a new design certification application submittal date will be communicated to the NRC during periodic project review meetings.

- Will the applicants be organized into DCWGs? If known, what is the membership of the DCWG and which party is the primary point-of-contact designated for each DCWG?

Response: Yes. Westinghouse supports the DCWG approach and will apply this approach in its efforts to certify a SMR Design and support COL Applicants in their efforts to obtain a COL. Westinghouse and Ameren fully supports the design centered working group (DCWG) approach described in RIS 2006-06 - *"New Reactor Standardization Needed to Support Designed- Centered Licensing Review Approach."*

Ameren continues to pursue opportunities that will support the future submission of a Reference Combined Operating License (R-COLA) application for multiple SMR units at the Callaway Site. Subsequent COL applicants who desire to license for a Westinghouse SMR at their locations – would be added to the DCWG as they are identified. Westinghouse is the primary point of contact for the DCWG.

- Have protocols been developed to provide coordinated responses for requests for additional information with generic applicability to a design center?

Response: Yes. The request for additional information (RAI) process used for the AP1000® plant design certification is being updated to coordinate RAI responses for SMR applications (including DCWG review). As they are received, RAIs will be reviewed to determine if they are either *generic* or *site-specific* COL items. If the RAI(s) are generic, the R-COL applicant will answer the issue, with the S-COL applicants taking an "also applies to the S-COLA" approach.

- Which applicant that references the design will be designated as the reference COL applicant or, alternatively, how will various applications (e.g., CP, DC, COL) be coordinated to achieve the desired design-centered licensing review approach?

Response: Ameren continues to pursue opportunities that would support the submission of a R-COLA for the Westinghouse SMR plant design.

When (month and year) will CP, COL, or ESP applications be submitted for review? In addition, what are the design, site location, and number of units at each site?

Response: Ameren continues to pursue opportunities that will support the future submission of a COL application – in accordance with 10 CFR Part 52 – to the NRC for multiple SMR units at the Callaway Site following the submittal of the Westinghouse SMR DCA. Due to the uncertainty of the opportunities being pursued, the projected submittal date has not been determined. Should these opportunities be successful, the projected submittal date will be communicated to the NRC at the earliest opportunity.

- Are vendors or consultants assisting in the preparation of the application(s)? If so, please describe their roles and responsibilities for the design and licensing activities.

Response: Yes. Vendors are being strategically used to supplement the Westinghouse-led plant design and construction efforts. Vendors were chosen for their specific expertise and ability to support the DCA design development and delivery. Said vendors are identified on the Westinghouse qualified vendor list and have prior experience with nuclear projects. Westinghouse will provide some Nuclear Steam Supply System (NSSS) components, such as the nuclear fuel.

Should Ameren commit to submittal of a COL application vendors and consultants would be contracted to research, analyze, and write:

- Portions of the Environmental Report
- Various site-specific sections of the Safety Analysis Report
- Other combined operating license application (COLA) sections for Ameren

Vendors would also be used to design various site-specific Structures, Systems, and Components (SSCs), such as non-safety-related support systems necessary for plant operation and support facilities.

Ameren would retain overall responsibility for SMR R-COL application licensing activities. Ameren would conduct activities related to developing the SMR application in accordance with applicable Callaway Plant Unit 1 Operating Quality Assurance Manual (OQAM) controls. This approved quality assurance (QA) program implements 10 CFR 50 Appendix B requirements. Vendors, consultants, or suppliers contracted to perform safety-related activities would be qualified and maintained under existing Callaway Plant Unit 1 OQAM procedures and controls.

## Design, Testing, and Application Preparation

- What is the current status of the development of the plant design (i.e., conceptual, preliminary, or finalizing)? Has the applicant established a schedule for completing the design? If so, please describe the schedule.

Response: The Westinghouse SMR design draws extensively on the certified passive technology of the AP600/AP1000® design, thereby making it difficult to describe a status of the SMR design. Many of the design features of the AP1000® in the areas of fuel, I&C, human factors, and passive safety system design will be applied directly or adapted to the SMR design. Westinghouse considers the SMR design to be in the preliminary design stage. Several DCD status meetings have been held with the NRC where the design completion status has been discussed. These meetings have enabled the NRC staff to form a clear understanding of the design status of several key review areas.

Westinghouse is using a management strategy that focuses on completing parallel design tasks to mitigate potential emergent or challenging issues that could threaten completing the Westinghouse SMR plant design. [

] <sup>a,c</sup> At this time the design is sufficient to support preparing and submitting the DCA and it is expected that the detailed design work will continue in parallel with the design certification (DC) preparation and application. To implement this management approach, an integrated project schedule is being used. Said schedule covers the entire design process. Rolling wave planning is being used – in which detailed activities are planned for the near-term two-year period, and major activities are planned for following years. This approach is being used to efficiently plan and address necessary details at the appropriate time.

- What is the applicant's current status (i.e., planning, in progress, or complete) for the qualification of fuel and other major systems and components? Has the applicant established a schedule for completing the qualification testing? If so, please describe the schedule.

Response: The fuel design for the Westinghouse SMR is a partial height derivative of the 17 x 17 Robust Fuel Assembly (RFA) used in the AP1000® reactor design. Initial SMR fuel tests were conducted in the summer of 2013. This fuel design is an adaptation of the most proven and widely-used design in the industry.

In addition, Westinghouse has developed a SMR Small Break LOCA Phenomena Identification and Ranking Table (PIRT) to help inform us of any potential testing needs. Our design philosophy is to use proven components in our design when available. The PIRT evaluation was submitted to the NRC for review in 2012. Also submitted for NRC review were a description of the "Separate Effects Test" and the "Integrated Effects Test" planned to be conducted to verify certain key aspects of the Westinghouse SMR design. The NRC review is nearing completion. No further incremental fuel tests are anticipated.

- What is the applicant's status (i.e., planning, in progress, or complete) in developing computer codes and models to perform design and licensing analyses? Has the applicant defined principal design criteria, licensing-basis events, and other fundamental design/licensing relationships? Has the applicant established a schedule for completing the design and licensing analyses? If so, please describe the schedule.

Response: Computer codes used to model the Westinghouse SMR are [ ]<sup>a,c</sup>. The applicability of all codes is being confirmed as they are identified and applied to the Westinghouse SMR design. [ ]

[ ]<sup>a,c</sup> Westinghouse is currently using the following computer codes: WCOBRA/TRAC-TF2, RETRAN, MAAP, VIPRE, ANC, and GOTHIC. Due to the extensive qualification basis for use on the AP600 and AP1000<sup>®</sup> passive safety systems, Westinghouse is confident that these codes can be applied to the Westinghouse SMR design. Westinghouse has used the safety analysis codes to establish key system parameters such as pipe line sizes, tank and pressure vessel volumes, and safety system actuation set points. The safety analysis will be completed on a schedule to support the DCD submittal.

What is the applicant's status in designing, constructing, and using thermal-fluidic testing facilities and in using such tests to validate computer models? Has the applicant established a schedule for the construction of testing facilities? If so, please describe the schedule. Has the applicant established a schedule for completing the thermal-fluidic testing? If so, please describe the schedule.

Response: [ ]

[ ]<sup>a,c,d</sup>.

- What is the applicant's status in defining system and component suppliers (including fuel), manufacturing processes, and other major factors that could influence design decisions? Has the applicant established a schedule for identifying suppliers and key contractors? If so, please describe the schedule.

Response: Westinghouse has a proven nuclear component supply chain that will be used to both deliver the Westinghouse SMR plant design to market and ensure that the necessary support services are available to Westinghouse SMR customers after startup. Westinghouse has identified U.S. manufacturers as suppliers for all Westinghouse SMR components. Additionally, Westinghouse will manufacture and deliver [ ]

[ ]<sup>a,c</sup> located throughout the U.S. Qualified suppliers were also



identified for the [ ]<sup>a,c</sup> a key component in the Westinghouse SMR. Furthermore, qualified suppliers who can factory manufacture the [ ]<sup>a,c</sup> were identified.

- What is the applicant's status in the development and implementation of a quality assurance program?

Response: To comply with regulatory, industry, statutory, and customer quality requirements imposed by customers or regulatory agencies, Westinghouse produces items and services under the Westinghouse Quality Management System (QMS). The QMS describes Westinghouse commitments to the quality assurance (QA) requirements of:

- ISO 9001
- ISO 90003
- 10CFR50, Appendix B
- ASME NQA-1-1994 Edition
- Other national/international regulatory requirements

The U.S. NRC reviewed and approved the Westinghouse QMS.

Ameren will conduct activities related to developing the R-COLA in accordance with applicable Callaway Plant Unit 1 Operating Quality Assurance Manual (OQAM) controls. This approved QA program implements 10 CFR 50 Appendix B requirements. Suppliers delegated to perform safety-related activities will be qualified and maintained under existing Callaway Plant Unit 1 OQAM procedures and controls. Ameren previously prepared and implemented a QA program to support the Callaway Plant Unit 2 U.S. EPR COLA project. When appropriate, the QA program will be revised and updated to support the SMR project.

What is the applicant's status in the development of probabilistic risk assessment (PRA) models needed to support applications (e.g., needed for Chapter 19 of safety analysis reports or needed to support risk-informed licensing approaches)? Does the applicant plan to use the PRA for any risk-informed applications (i.e., risk-informed technical specifications, risk-informed inservice inspection, risk-informed categorization and treatment, risk-informed inservice testing, etc.)? What are the applicant's plans for using the PRA models in the development of the design? At what level will the PRA be prepared, and when will it be submitted in the application process?

Response: Westinghouse has held detailed meetings with the NRC regarding the Westinghouse PRA. Westinghouse SMR PRA development is continuing. [ ]

[ ]<sup>a,c</sup> Westinghouse plans to document the PRA when [ ]<sup>a,c</sup>

Ameren cannot predict whether to pursue risk informed applications as part of a possible R-COL application at this time. This would be communicated with the NRC as plans develop.

- What is the applicant's status in the development, construction, and use of a control room simulator?

Response: Westinghouse has extensively tested and delivered six simulators to its AP1000® plant customers and [

] <sup>a,c</sup> The Human Factors program will also leverage the  
AP1000® Human Factors design.

- What are the applicant's current staffing levels (e.g., full-time equivalent staff) for the design and testing of the reactor design? Does the applicant have plans to increase staffing? If so, please describe future staffing plans.

Response: [

] <sup>a,c,d</sup>

- What are the applicant's plans on the submittal of white papers or technical/topical reports related to the features of their design or the resolution of policy or technical issues? Has the applicant established a schedule for submitting such reports? If so, please describe the schedule.

Response: Westinghouse is projecting limited need to submit white papers or technical/topical reports related to the features of their design or the resolution of policy or technical issues. Westinghouse has submitted a topical reports describing the PIRT, test facility design and based on NRC feedback is anticipating the need to submit an additional topical [ <sup>a,c</sup>

Westinghouse and Ameren are also participating in NEI's SMR Task Force in the preparation and submittal of a series of generic position papers related to the resolution of policy issues that impact the commercial development of SMRs (including: ITAAC & EPZ).

- Has the applicant established a schedule for submitting such reports? If so, please describe the schedule.

Response: [

] <sup>a,c</sup>

- Will ESP applicants seek approval of either "proposed major features of the emergency plans" in accordance with 10 CFR 52.17(b)(2)(i) or "proposed complete and integrated emergency plans" in accordance with 10 CFR 52.17(b)(2)(ii)?

Response: Not applicable because Ameren does not plan to pursue an early site permit.

- Describe possible interest in the use of the provisions in Subpart F, "Manufacturing Licenses," of 10 CFR Part 52 instead of, or in combination with, other licensing approaches (e.g., DC or DA).

Response: Westinghouse intends to pursue the certification of an integral PWR design and does not intend to make use of the provisions in Subpart F, "Manufacturing Licenses," of 10 CFR Part 52.

- Describe the desired scope of a possible ML and what design or licensing process would address the remainder of the proposed nuclear power plant. For example, would the ML address an essentially complete plant or would it be limited to the primary coolant system that basically comprises the integral reactor vessel and internals?

Response: The Westinghouse SMR will follow the 10 CFR Part 52 approach without implementing the provisions in Subpart F for "Manufacturing Licenses."

- Describe the expected combination of manufacturing, fabrication, and site construction that results in a completed operational nuclear power plant. For example, what systems, structures, and components are being fabricated and delivered? Which of these are being assembled on site? Which of these are being constructed on site?

Response: The Westinghouse approach to Westinghouse SMR modules is both evolutionary and revolutionary. It is evolutionary because it extends Westinghouse's unique experience in designing and constructing the current AP1000® plants. [

] <sup>a,c</sup>

Westinghouse expects [

] <sup>a,c</sup>

Some non-safety-related support systems necessary for plant operation will be site-specific and constructed at the plant site.