

February 21, 2018

Mr. Stephen E. Kuczynski  
Chairman, President and Chief  
Executive Officer  
Southern Nuclear Operating Company, Inc.  
40 Inverness Center Parkway  
PO Box 1295  
Birmingham, AL 35201

SUBJECT: LICENSING MODERNIZATION PROJECT

Dear Mr. Kuczynski:

The staff of the U.S. Nuclear Regulatory Commission (NRC) wishes to acknowledge the useful interactions with the utility-led Licensing Modernization Project (LMP) in matters related to non-light-water reactor (non-LWR) technologies. The LMP prepared and provided the following draft white papers on key licensing issues, in the series "Modernization of Technical Requirements for Licensing of Advanced Non-Light Water Reactors," and the NRC staff in turn gave informal written feedback to the LMP on each white paper as noted:

- "Selection of Licensing Basis Events," issued April 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17104A254), and related staff questions and comments (ADAMS Accession No. ML17145A573)
- "Probabilistic Risk Assessment Approach," issued June 2017 (ADAMS Accession No. ML17158B543), and related staff questions and comments (ADAMS Accession No. ML17233A187)
- "Safety Classification and Performance Criteria for Structures, Systems, and Components," issued October 2017 (ADAMS Accession No. ML17290A463), and related staff questions and comments (ADAMS Accession No. ML17319A210)
- "Risk-Informed and Performance-Based Evaluation of Defense-in-Depth Adequacy," issued December 2017 (ADAMS Accession No. ML17354B174), and related staff questions and comments (ADAMS Accession No. ML18024A595)

The NRC staff conducted several public meetings with the LMP and other stakeholders to discuss these white papers, and the interactions have helped set the stage for developing more formal guidance.

Although formal NRC review and approval of the white papers was not requested and is not provided, the interactions were helpful to resurrect and advance the work previously performed under the Next Generation Nuclear Plant project. The NRC staff and various stakeholders are now in a better position to engage and prepare guidance documents, adding to the planned issuance of Regulatory Guide 1.232, "Guidance for Developing Principal Design Criteria for Non-Light Water Reactors." These efforts are an important part of the staff's activities to

establish technology-inclusive, risk-informed, performance-based licensing approaches for non-LWR technologies. The recent public meeting with the LMP and other stakeholders on February 14, 2018, was another useful step in defining goals and initiating efforts to develop guidance such that developers of non-LWRs are better able to make important design and licensing decisions.

Please address any comments or questions about the NRC's interactions with the LMP and development of the related guidance documents to Bill Reckley at (301) 415-7490 or [william.reckley@nrc.gov](mailto:william.reckley@nrc.gov).

Sincerely,

**/RA/**

Frederick D. Brown  
Acting Director  
Office of New Reactors

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