



LO-124978

September 08, 2022

Docket No. 99902052

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

**SUBJECT:** NuScale Power, LLC Submittal of Presentation Materials, Entitled "Carbon Free Power Project (CFPP) Combined License Application (COLA) Presentation Proposed Licensing Approach to Facilitate CFPP Early Construction (Open Session)" PM-124979-NP, Revision 0

**REFERENCE:** NuScale Power Letter to Nuclear Regulatory Commission, "Licensing Lead for Carbon Free Power Project, LLC", dated October 12, 2021 (ML21299A363)

NuScale Power, LLC (NuScale) on behalf of CFPP, requests a meeting with the NRC technical staff on September 13, 2022, to discuss the CFPP proposed licensing approach to facilitate early construction (i.e., construction prior to CFPP license issuance).

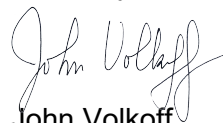
The purpose of this submittal is to provide presentation materials to the NRC for use during this meeting.

Enclosure 1 is the nonproprietary version of the presentation entitled "Carbon Free Power Project (CFPP) Combined License Application (COLA) Presentation Proposed Licensing Approach to Facilitate CFPP Early Construction (Open Session)" PM-124979-NP, Revision 0. The proprietary version is provided in a separate submittal, under letter number LO-125010.

This letter does not make any regulatory commitments or revisions to any existing regulatory commitments.

If you have any questions, please contact Kyra Perkins at 980-349-4117 or at [kperkins@nuscalepower.com](mailto:kperkins@nuscalepower.com).

Sincerely,

A handwritten signature in black ink, appearing to read "John Volkoff". The signature is fluid and cursive, with the first name "John" being more prominent.

John Volkoff  
Manager, Combined License Applications  
NuScale Power, LLC  
*COLA Support on behalf of CFPP, LLC*

Distribution: Michael Dudek, NRC  
Omid Tabatabai, NRC  
Greg Cranston, NRC  
Demetrius Murray, NRC

Enclosure 1: "Carbon Free Power Project (CFPP) Combined License Application (COLA) Presentation Proposed Licensing Approach to Facilitate CFPP Early Construction (Open Session)" PM-124979-NP, Revision 0

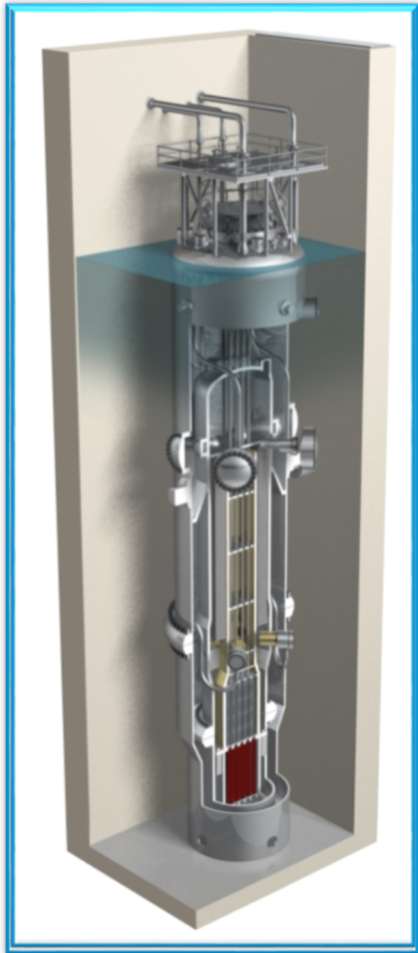


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**Enclosure 1:**

“Carbon Free Power Project (CFPP) Combined License Application (COLA) Presentation  
Proposed Licensing Approach to Facilitate CFPP Early Construction (Open Session)”  
PM-124979-NP, Revision 0

# **Carbon Free Power Project (CFPP) Combined License Application (COLA) Presentation**



## **Proposed Licensing Approach to Facilitate CFPP Early Construction (Open Session)**

September 13, 2022

**Kyra Perkins**

NuScale COLA Licensing Supervisor

**Matt Featherston**

Fluor COLA Licensing Lead

# Agenda

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- Purpose
- Introduction/Background
  - Regulatory Basis
  - Need for CFPP "Early Construction"
  - CFPP Early Construction Activities
- Proposed Licensing Approach to Facilitate CFPP Early Construction
- NRC/DOE Coordination – NEPA
- Q&A

# Purpose

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- Describe factors leading to need for "early construction" (i.e., construction activities prior to CFPP license issuance)
- Describe CFPP licensing approach to facilitate early construction
  - Navigates both NRC and DOE regulatory frameworks
- Request NRC feedback on key licensing schedule milestones specific to CFPP early construction

# Introduction/Background

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## Early Construction Regulatory Basis

- Per 10 CFR 52.91 and 10 CFR 50.10, **No License, No Construction, except...**

*No person may begin the construction of a production or utilization facility on a site on which the facility is to be operated until that person has been issued either a construction permit..., a combined license under part 52..., an early site permit..., or a **limited work authorization**.... [emphasis added]*

- Processes/mechanisms per NRC regulatory framework to allow early construction
  - Limited Work Authorization (LWA) per 10 CFR 50.10(d) and 10 CFR 2.101(a)(9)
  - Regulatory exemption per 10 CFR 50.12
- Construction vs. Preconstruction as defined in 10 CFR 50.10(a)
  - “Construction” – reasonable nexus to radiological health and safety..., require LWA or...
  - Activities not defined as "construction" referred to as "preconstruction" do not require an LWA or...

# Questions

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# Acronyms

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CFPP	Carbon Free Power Project
COLA	Combined License Application
COL	Combined License
LWA	Limited Work Authorization
NRC	Nuclear Regulatory Commission
DOE	Department Of Energy
NEPA	National Environmental Policy Act