

September 09, 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 Licensing Strategy for Emergency Planning," PM-124573-NP, Revision 0

REFERENCE:

1. Letter from CFPP to the NRC, NuScale Power, LLC Submittal on behalf of Carbon Free Power Project (CFPP) Combined License Application (COLA) Licensing Strategy for Emergency Planning, dated August 17, 2022 (ML22229A510)

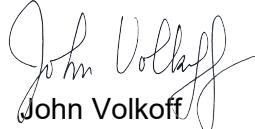
NuScale Power, LLC (NuScale) on behalf of CFPP has requested a meeting with the NRC technical staff on September 20, 2022, to discuss Licensing Strategy for Emergency Planning.

The purpose of this submittal is to provide presentation materials to the NRC for use during this meeting. The Enclosure to this letter is nonproprietary entitled "Carbon Free Power Project (CFPP) Combined License Application (COLA) Presentation Licensing Strategy for Emergency Planning."

This letter makes no regulatory commitments and no revisions to any existing regulatory commitments.

If you have any questions, please contact Kyra Perkins at 980-349-4117 or at kperkins@nuscalepower.com.

Sincerely,



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

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Enclosure: "Carbon Free Power Project (CFPP) Combined License Application (COLA)
Presentation Licensing Strategy for Emergency Planning," PM-124573-NP,
Revision 0



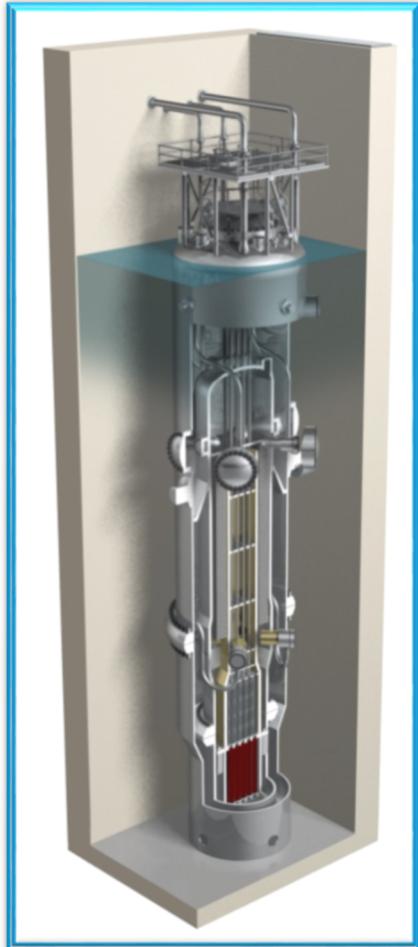
LO-124575

155 North 400 West, Suite 480
Salt Lake City, UT 84103

Enclosure:

“Carbon Free Power Project (CFPP) Combined License Application (COLA) Presentation
Licensing Strategy for Emergency Planning,” PM-124573-NP, Revision 0

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



Licensing Strategy for Emergency Planning

September 20, 2022

Beth Dalick
Licensing Engineer, NuScale

Agenda

- **Purpose**
- **Emergency Plan (EP) Licensing Strategy Topics**
 1. Use of the proposed new EP Rule under 10 CFR 50.160
 2. Utilize NuScale Emergency Planning Zone (EPZ) Sizing Methodology
 3. On-Shift and Emergency Response Organization (ERO) Staffing Licensing Topical Report (LTR)
 4. Emergency Action Levels (EALs) Licensing Topical Report
 5. Emergency Plan License Condition or Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)
- **Next Steps**

Purpose

- CFPP COLA licensing strategy for Part 2 Final Safety Analysis Report Section 13.3 Emergency Planning, and COLA Part 5, Emergency Plan.
- NuScale unique plant design offers opportunities to optimize Emergency Planning requirements.
- Identify and resolve any significant issues and content to support the CFPP COLA.

New EP Rule under 10 CFR 50.160

- 10 CFR 50.160 final rulemaking (the Rule)
 - Publication schedule is now January 2023.
- CFPP COLA Emergency Plan is being developed based on the new Rule.
- Status of regulatory oversight framework
 - Development of a performance-based EP Program

NuScale EPZ Sizing Methodology

- CFPP COLA will implement NuScale EPZ Sizing Methodology
 - Applied with supporting site and design-specific information
 - Site-Specific EPZ

On-Shift and ERO Staffing LTR

- First of a Kind (FOAK) approach due to neither NEI 10-05 nor ISG-01 applicable to SMR.
- LTR will describe methodology to be applied for determining emergency plan staffing requirements.
 - CFPP will implement staffing LTR to determine site-specific on-shift and augmented ERO staffing.
- Describe authority, responsibilities, and duties of individuals that will implement the emergency plan.

Emergency Action Levels LTR

- FOAK due to neither NEI 99-01 nor NEI 07-01 applicable to SMR.
- LTR will describe methodology to describe NuScale Power Plant emergency classification and EAL scheme.
 - Utilize Industry experience
 - NuScale EPZ Methodology LTR will be applied
- CFPP will implement EAL LTR to develop a site-specific EAL scheme

License Condition or ITAAC Development

- CFPP COLA will propose ITAAC and License Conditions addressing:
 - A fully developed set of site-specific EALs
 - On-Shift and augmenting ERO staffing
 - Emergency Plan Performance-Based Matrix in accordance with 10 CFR 50.160
- Implementation milestone
 - Initial drill exercise

Next Steps

- Submittal timeline for the LTRs
- Types and Frequency of Interactions
 - Pre-Application meetings
 - Bi-weekly or Monthly project management meetings

Questions?

Acronyms

CFPP	Carbon Free Power Project
CFR	Code of Federal Regulations
COLA	Combined License Application
EAL	Emergency Action Level
EP	Emergency Planning
EPZ	Emergency Planning Zone
ERO	Emergency Response Organization
FOAK	First of a Kind
ITAAC	Inspections, Tests, Analyses, and Acceptance Criteria
NEI	Nuclear Energy Institute
LTR	Licensing Topical Report