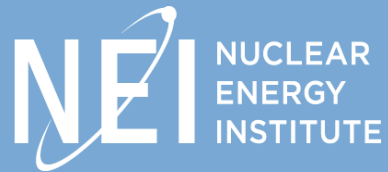


Industry Early Observations of Recent Licensing Actions

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NRC Fuel Cycle Facility
Stakeholders' Meeting



October 2022



Industry Early Observations of Recent Licensing Actions

- Since May '22 Stakeholders' Meeting, Time and Cost Data for 10 Fuel Cycle Facility Licensing Actions Collected & Reviewed, e.g.,
 - Triennial Decommissioning Funding Plan Reviews; Methodology Approvals; Others
- NRC Cost Estimates Were Compared to Actual Cost and Time (As Documented in NRC Billing* and Tracked by Licensees)
- Initial Data Review Indicates:
 - NRC Overestimated Licensing Action Cost in 2 cases (-28%; -71%)
 - NRC Underestimated Licensing Cost/Time in 8 Cases (from +12% - +540%)

*Billing not yet complete in 2 cases

Early Observations (continued)

- Industry Seeks Discussion on:
 - Why the Cost/Time for DFP Review/Approval Continues to Vary Significantly and is not Predictable; Even In Cases Where Site Information Has Essentially Not Changed Since Last NRC Approval
 - Whether NRC is Tracking, Collecting and Analyzing Licensing Action Cost/Time Data
 - Update June 2020 Licensing Estimate Table on NRC Website?
 - Whether Licensing Program Enhancements Identified Through the Smarter Program Initiative Have Been Fully Implemented and, if so, Any Early Observations (e.g., LIC-FM-1, 2, 3 and 4)