



October 25, 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 on behalf of Carbon Free Power Project, LLC (CFPP, LLC) Presentation Materials, Entitled "Carbon Free Power Project (CFPP) Combined License Application (COLA) Presentation Four-Phase Review Strategy, (Open Session)," PM-127407-NP, Revision 0

- REFERENCES:**
1. LO-112496, NuScale Power, LLC Letter of Intent Providing the Carbon Free Power Project (CFPP) Combined License Application (COLA) Response to NRC Regulatory Issue Summary 2020-02 and Regulatory Engagement Plan, PL-106946, Revision 0 (ML22028A277, ML22028A278)
  2. LO-121350, NuScale Power, LLC Submittal Entitled "Carbon Free Power Project (CFPP) Regulatory Engagement Plan," Revision 1, on behalf of CFPP, LLC (ML22224A238, ML22224A239)

NuScale Power, LLC (NuScale) has requested a meeting with the NRC technical staff on October 31, 2022, to discuss the Four-Phase Review Strategy. NuScale requested both open and closed sessions for this meeting due to the proprietary nature of certain topics that will be discussed.

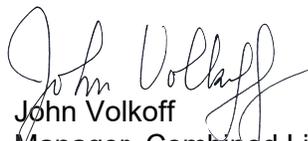
The proposed Four-Phase Review Strategy was introduced in January 2022 as part of CFPP Regulatory Engagement Plan, Revision 0 (Reference 1), with further details supporting this proposed strategy provided in August 2022 as part of CFPP Regulatory Engagement Plan, Revision 1 (Reference 2), currently under NRC review. The enclosed presentation materials are intended to further the discussion on the proposed Four-Phase Review Strategy during the upcoming public meeting scheduled for October 31, 2022.

Enclosure 1 to this letter is the nonproprietary presentation entitled "Carbon Free Power Project (CFPP) Combined License Application (COLA) Presentation Four-Phase Review Strategy, (Open Session)," PM-127407-NP, Revision 0. The proprietary version is provided in a separate submittal, under letter number LO-127410.

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

If you have any questions, please contact Susan Baughn at 541-452-7319 or at sbaughn@nuscalepower.com.

Sincerely,



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 Four-Phase Review Strategy, (Open Session)," PM-127407-NP, Revision 0, nonproprietary version

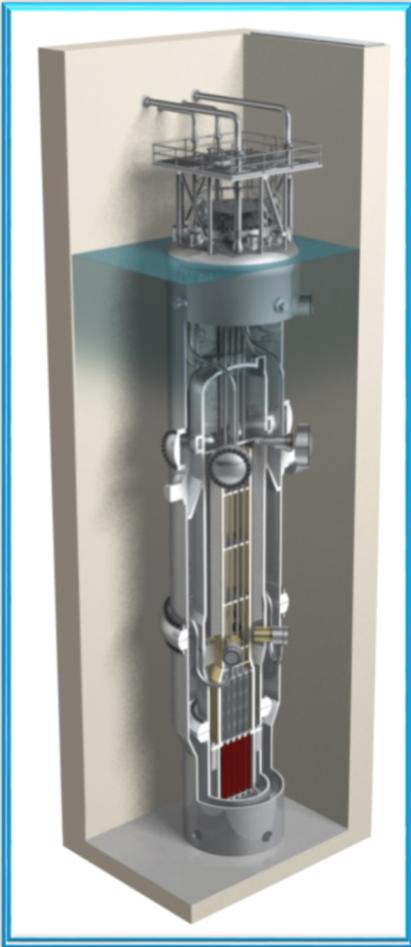


LO-127409

**Enclosure 1:**

“Carbon Free Power Project (CFPP) Combined License Application (COLA) Presentation Four-Phase Review Strategy, (Open Session),” PM-127407-NP, Revision 0, nonproprietary version

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



## Four-Phase Review Strategy (Open Session)

October 2022

# CFPP Team

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## Leadership

Glenn Neises  
*CFPP Owner's Engineer  
Nuclear Director  
Burns & McDonnell*

Scott Head  
*Regulatory Affairs Manager  
CFPP*

Ken Rach  
*CFPP Owner's Engineer  
MPR*

Pete Kissinger  
*Director Nuclear Fleet Operations  
Strategy & Services  
Xcel Energy Nuclear Services*

Dan Stenger  
*Attorney  
Hogan Lovells US LLP*

## Licensing

John Volkoff  
*Manager, Combined License  
Applications  
NuScale Power*

Susan Baughn (Presenter)  
*Supervisor, Licensing  
NuScale Power*

Beth Brewer  
*Licensing Engineer 3  
NuScale Power*

Peter Shaw  
*Licensing Engineer 4  
NuScale Power*

Matthew Featherston  
*Nuclear Licensing Lead  
Fluor*

Eric Woods  
*COLA Project Manager  
Fluor*

# Purpose

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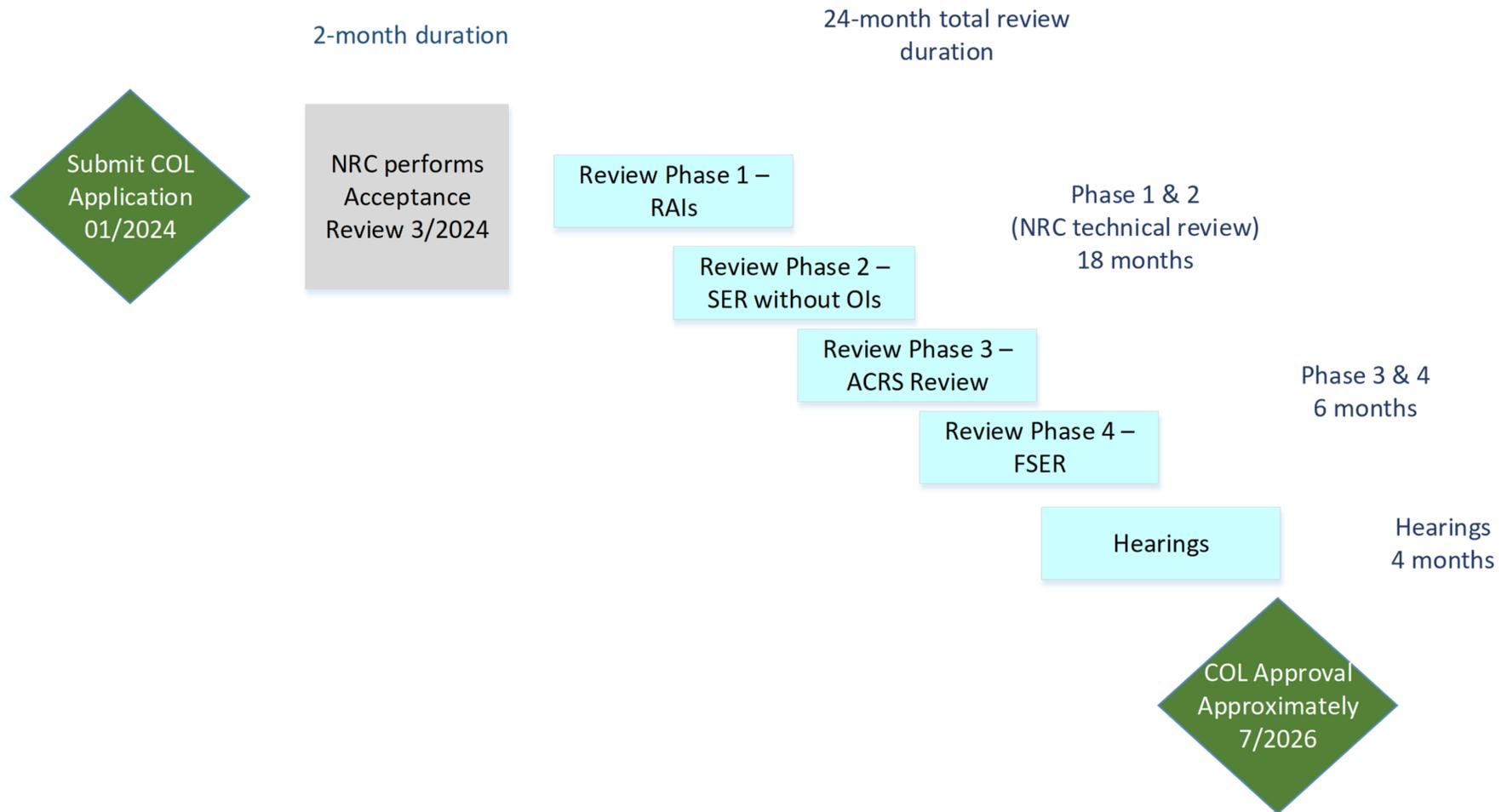
- **To introduce an early engagement strategy to optimize COLA review once NRC receives submittal**
- **Propose a process which will keep NRC informed throughout COLA development**
- **Describe how the strategy will provide NRC insight on staffing expectations when COLA submittal is received**
- **Request written NRC feedback on proposed strategy for COLA development**

# Four-Phase Review

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- **Four-phase review is proposed for CFPP COLA and subsequent NuScale design-based COLAs**
- Propose eliminating two phases: Issuance of the SER with open items, and the associated ACRS review
  - Safety-related parts of design identical to Standard Design and incorporated by reference
  - For new or site-specific items, will conduct pre-application meetings and white papers (i.e., EP, Security, volcanic hazards).

# Four-Phase Review





# Preliminary COLA Strategy Review Process

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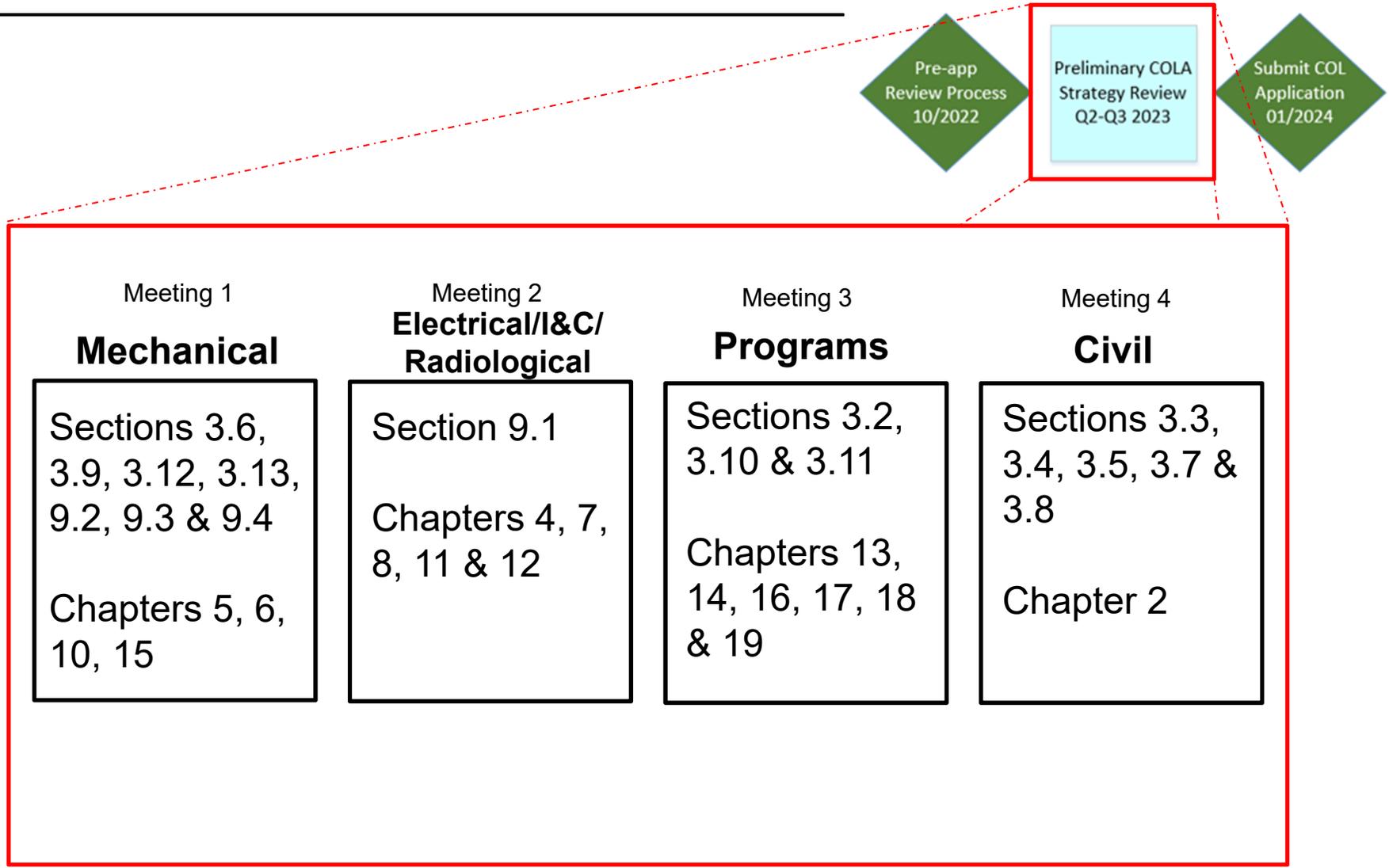
- **Information will be submitted as white papers with follow-on pre-apps in a process similar to VHA**
- **Use a standard form, COLA Content Notice (CCN), to summarize the strategy of the COLA content to be submitted**
  - Proposed content overview
  - Applicable precedent
  - Supporting information available for audit
  - Known supplemental items or departures
  - Applicable topical reports
- **Present by chapter or in some cases, section**

# Chapter/Section Classification

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- **CCNs will be divided into Chapters/Sections by discipline**
  - Mechanical, Electrical, I&C, Radiological, Programs, Civil
- **Within each discipline, divide each chapter/section into categories by the level of anticipated NRC engagement and review effort**
  - Determines depth of information presented in CCN

# Preliminary COLA Strategy Review



# Pre-Application Engagement

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- **Continued support of pre-application meetings for topical reports**
  - Use a repeatable process for initial engagement and follow-up prior to submittal of reports or other documents to be incorporated by reference
  - Significant Areas for Discussion
    - Security Plan
    - Environmental Report
    - QAPD
    - EALs and EROs

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# Questions?

# Acronyms

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ACRS	The Advisory Committee on Reactor Safeguards
CCN	COLA Content Notice
COL	Combined License
COLA	Combined License Application
EALs	Emergency Action Levels
EP	Emergency Planning
EROs	Emergency Response Organizations
FSER	Final Safety Evaluation Report
NRC	The U.S. Nuclear Regulatory Commission
OI	Open Item
QAPD	Quality Assurance Program Description
RAI	Request for Additional Information
SER	Safety Evaluation Report