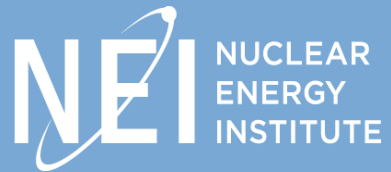


Industry Observations of NRC's Licensing Program

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Meeting - Rockville, MD



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Background

- **2019-2020:** Smarter Licensing Program Initiative Launched
 - Result: 42 Recommendations Based on Significant Industry Input
- **2021-2022:** NRC Implemented Recommendations & Continues Dialogue During Public Meetings
 - e.g., October 2022, industry presented actual versus estimated time & cost data for 10 licensing actions
- ***May 2023:*** *Industry to Share its Experiences & Observations with Recent Licensing Actions & License Renewal*
 - ***Goal:*** *identify generic issues & respective areas for improvement and mutually commit to ongoing engagement*

Four Licensing Program Themes Emerged

1. Need for Increased Process Clarity & Predictability
2. Need for Increased Transparency & Predictability
3. Need for Increased Management Communication
4. Need for Routine Reviews of Major Licensing Actions

Theme 1. Increased Clarity & Predictability

- **Better Define Expectations for Initial Submittal**
 - 2007-WEC receives 20-year license; 2014-WEC submits same application requesting 40-year license; NRC rejects it in absence of rule change
 - Pre-application meetings extremely valuable to applicant and NRC
- **NRC's acceptance review decision does not represent safety determination; therefore, it should not be unduly delayed**
- **Requests for Supplemental Information (RSI) & Requests for Additional Information (RAI) – Opportunity to apply VLSSIR concept?**
 - Need for purpose, timing & scope of each RSI or RAI
 - Need for clear, documented regulatory basis for each request
 - Need for early engagement on draft requests to ensure mutual understanding, clear expectations & timeline

1. Increased Clarity & Predictability (cont)

- **NRC's Review of Triennial Decommissioning Funding Plan Submittals Continue to Vary Even In Cases Where Site Information & Practices Have Essentially not Changed Since Last NRC Approval(s) – VLSSIR?**
 - e.g., persistent NRC question on inventory management with same answer
- **Increased Clarity on “Construction at Risk” & Site Preparation Work**
- **Flexibility on Timing of Application or Amendment & Relevant Environmental Report Submittals – VLSSIR?**
 - Timing of safety evaluation and environmental reports are not safety or risk significant, not interdependent, and can be reviewed sequentially
 - Exemptions available but costly and unnecessary from safety perspective

Theme 2. Increased Transparency/Predictability

- **Early Engagement of Stakeholders During Environmental Impact Statement process**
 - Section 106 & NEPA intersection needs to be clarified & more transparent
 - New/Different NRC information requests in absence of new rule or guidance
- **Increased Transparency and Predictability of NRC Licensing Action Cost/Time Data**
 - Industry licensing case examples presented Oct 2022 demonstrate need for increased accuracy of NRC cost/time estimates versus actual expenditures
 - Tracking, transparency of case data on NRC webpage would increase predictability of licensing timelines & resource expenditures/needs for both NRC and industry
 - Inform NRC budget assumptions & qualitative factors, e.g., “effort factor” for annual fees
 - Inform applicant/licensee resource planning & execution
 - Help meet NRC’s goal of increased transparency for stakeholders

Theme 3. Increased Communication

- **Routine Calls & Meetings Between NRC Management and Applicant or Licensee to Discuss Action Item Status, Projected Timeline, New Challenges, Related Case Work that Informs NRC Review, etc.**
 - Sites/Applicants benefit from pre-scheduled routine management calls
 - Particularly useful prior to issuance of or responding to RSIs/RAIs
- **Early Site Visits by Both NRC Management, Technical Reviewers and Project Managers to Inform NRC Reviews of Licensing Submittals**
 - Additional site visits during the application or licensing process may also be beneficial depending on complexity of action or timeline

Theme 4. Review of Major Licensing Actions

- **New or Less Experienced NRC Reviewers Should Benefit From Licensing “Lessons-Learned” & Similar Completed Casework**
- **Perform Lessons-Learned Reviews Following Major Licensing Actions to Further Refine Processes/Practices & Define Best Practices**
 - Routine practice for industry to perform self-assessment with goal of continuous improvement
 - Industry could provide valuable, timely input to NRC’s respective effort
 - Possibly incorporate topic as routine agenda item for future s/a FCF Stakeholders’ Meeting

Discussion Topics

- **NRC Observations?**
- **Mutual Generic Observations, Best Practices or Concerns?**
- **Possible Next Steps to Enhance Licensing Program:**
 - NRC licensing cost/time data routinely posted and trackable on NRC's website
 - Routine scheduled management calls (e.g., biweekly/monthly) between applicant/licensee to discuss status, IOUs, etc. on specific licensing actions
 - Periodic NRC-industry meetings to track progress with goal of continued improvement

THANK YOU!