

NRC Public Meeting: Possible Efficiencies on the Subsequent License Renewal Application Review

NRR/DNRL and NMSS/REFS
September 5, 2024

Meeting Agenda

- A. Issuance of Comanche Peak LR + North Anna SLR
- B. Staff Requirements Memorandum (SRM-COMCTH-24-0003): LR/SLR Expectations (August 8, 2024)
- C. Staggering Future Applications
- D. Safety Review
 - License Renewal Roadmap Status Update
 - Progress on Piloting the Tiered Approach
 - Restructuring Audits
- E. Environmental Review
 - License Renewal Roadmap Status Update
 - Final Rule on LR GEIS
 - ADVANCE Act Report on Environmental Reviews



Comanche Peak License Renewal

Comanche Peak Nuclear Power Plant, Units 1 and 2, renewed licenses were issued July 30, 2024.

The review was completed 2 months ahead of schedule and 5,932 hours underbudget.



Comanche Peak LRA Receipt Est: 23,000 hours, 22 months Nov 2022 Staff License Renewal Roadmap + Supplement Mar/Apr 2024 Commission SRM 14,000 hours, 18 months Aug 2024









Commission SRM for a Roadmap Dec 2023 Comanche Peak
LR Issuance
17,068 hours, 20 months
July 2024

North Anna Subsequent License Renewal

North Anna Power Station, Units 1 and 2, subsequent renewed licenses were issued August 28, 2024.

The review was completed ~5,000 hours underbudget.



North Anna SLR Receipt st: 23 000 hrs 18 m

Est: 23,000 hrs, 18 mo. Aug 2020 Site-Specific ER Receipt Sept 2022 Commission SRM 14,000 hrs, 18 mo. Aug 2024









Commission Orders
CLI-22-02 and
CLI-22-03
Feb 2022

Staff License
Renewal Roadmap
+ Supplement
Mar/Apr 2024

North Anna SLR Issuance ~18,000 hrs, 46 mo. Aug 2024

License Renewal and Subsequent License Renewal Review Expectations (SRM– COMCTH-24-0003) (ML24221A320, August 8, 2024)



New Applications:

No more than 14,000 Hours, 18-months, 30-day acceptance review



Current Applications:

Adjust to meet new metrics

Actions:

- Continue:
 - Applying process improvements + lessons learned
 - Engagement with industry on timing of applications
 - Affording credit of operational programs
- Business process improvement exercise to identify + implement additional efficiencies
- Reporting to Commission:
 - Monthly Commission Assistant Notes on progress/metrics
 - Exceedance of 10% of metrics

Requesting Feedback on NRC's Recommendation: Staggering Future Submittals





Industry thoughts?

Safety Review



License Renewal Roadmap Dashboard

	SECY-24-0026 - Commitments	Date	Status	Safety
1	Implementation of License Renewal Roadmap		In Progress	Safety Environmental Review Review
1a	Safety Review		In Progress	
	Phase 1: Process Improvements	March 2024	Applied to LR/SLR Reviews	
	Phase 2: Tiered Approach	April 2024	Established; Piloting	Process Process
1			approach on Dresden SLR and Clinton LR	Improvements Improvements
	Phase 3: Additional Process Improvements	December 2024	In Progress	
1b	Environmental Review	Boodinibol 2021	In Progress	Update to LR
	Process Improvements	Various times,	Complete	Tiered GEIS Approved by Approach Commission on
	-	starting Dec 2022	-	Approach Commission on May 16, 2024
	 New: Implementation of LR GEIS 			1.3, 13, 232.
	o Process to streamline inflight LR/SLR reviews	April 2024	Complete	Updates to Awaiting
	 Implementing streamlining efforts (leveraging Cat 1 issues) for inflight reviews 	September 2024	In Progress	NUREG-2191 + Commission
	o Process to restart paused SLR reviews when LR	September 2024	III Flogiess	NUREG-2192 decision on SECY-24-0046
	GEIS in effect	September 2024	In Progress	
	New: FRA Requirements		Ü	
	 Develop framework for consideration of EAs 	June 2024	Complete	Safety Review: 3-Phase Approach
_	o Pilot for Dresden SLR	July 2024	Complete	
2	Launch of public dashboard of updates to the License	August 2024	Complete	Phase 1: Process Phase 2: Tiered Phase 3: Additional
3	Renewal Roadmap Issuance of updates to GALL-SLR Report and NUREG-2192	February 2025	In Progress	Improvements Approach Process Improvements
3		Tebluary 2020	III Togress	Approach
	Environmental Review: Process Improvements	(~)		Referencing Other Restructuring Other Audits
	1 Streamline EIS Development		Applied to	Regulatory Processes Guidance Reviews Regulatory Processes
	2 Agile Methodology for Workload Planning	\vee		Increased Technical Fleet Risk Insights to Determine Streamlining
	3 Realignment of the ECOE			Oversight Package Tool Phases 1 and 2 Depth of Review
	4 Use of Technology Tools to Improve Audits) \(\big \)	Piloting Approach	Initial License License Renewals
	5 Requests for Confirmatory Information (RCIs)		In Brodenso	Management Practices Staff Training Package
	6 Improvements in Comment Processing		In Progress	RAIs, Audits,
	7 Streamlining Administrative Prepublication Reviews			Questions Training on Oversight and Inspections
	8 Assessment of Public Meetings		Ava	Public vailability of Audit
	9 Increased Use of Contractor Support for Reviews		o	Questions

Progress on Applying the Tiered Approach (Dresden/Clinton)



Dresden SLR:

- Continuing the Tiered Approach into the technical review
- Leveraging of fleetwide programs supported significant reduction of Generic tiering
- Will continue to reinforce training and clarify review expectations with staff to support successful implementation

Clinton LR:

Tiering generally matched the Generic tiering

Requesting Feedback: Restructuring the Aging Management Audit

Goal: Seeking industry input/feedback in the staff's effort to improve the efficiency of the aging management audit



Considerations:

- Overall process
- Timing and length of audit
- Interactions (NRC/Applicant)
- Technology (ePortal, Microsoft Teams)
- Best practices / Lessons learned



In-Office Technical Review Audit

Breakout Sessions

On-Site Audit

Environmental Review



License Renewal Roadmap – Environmental Updates

Assessment of Public Meetings

Increased Use of Contractor Support for Reviews

License Renewal Roadmap Dashboard

		SECY-24-0026 – Commitments	Date	Status In Progress	Safety Environmental
	1	Implementation of License Renewal Roadmap	mentation of License Renewal Roadmap		Review Review
	1a	Safety Review		In Progress	
		Phase 1: Process Improvements	March 2024	Applied to LR/SLR Reviews	
		Phase 2: Tiered Approach	April 2024	Established; Piloting	Process Process
				approach on Dresden SLR	Improvements Improvements
L				and Clinton LR	
		Phase 3: Additional Process Improvements	December 2024	In Progress	
	1b	Environmental Review		In Progress	Tiered Update to LR GEIS Approved by
		Process Improvements	Various times,	Complete	Approach Commission on
			starting Dec 2022		May 16, 2024
		New: Implementation of LR GEIS			
		o Process to streamline inflight LR/SLR reviews	April 2024	Complete	Updates to Awaiting
		o Implementing streamlining efforts (leveraging (NUREG-2191 + Commission
		1 issues) for inflight reviews	September 2024	In Progress	NUREG-2192 decision on
		o Process to restart paused SLR reviews when LF			SECY-24-0046
		GEIS in effect	September 2024	In Progress	
		New: FRA Requirements			Safety Review: 3-Phase Approach
		Develop framework for consideration of EAs	June 2024	Complete	Safety Review. 5-Filase Approach
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	2	Launch of public dashboard of updates to the License Renewal Roadmap	August 2024	Complete	Phase 1: Process Phase 2: Tiered Phase 3: Additional
	3	Issuance of updates to GALL-SLR Report and NUREG-2192	February 2025	In Progress	Improvements Approach Process Improvements
	3	issuance of updates to GALL-SER Report and NOREG-2192	rebruary 2025	in Progress	Approach
		Environmental Review: Process Improvements	$\langle \rangle$	M	Methodology Referencing Char
		1 Streamline EIS Development		Applied to	For Estimates Guidance Previous Regulatory Processes Audits Audits
		2 Agile Methodology for Workload Planning	\vee	LR/SLR Reviews	Increased Technical Fleet Risk Insights to Determine Streamlining
		3 Realignment of the ECOE			Oversight Package Tool Phases 1 and 2 Depth of Review
		4 Use of Technology Tools to Improve Audits		Piloting Approach	Project Renewals Technical
		5 Requests for Confirmatory Information (RCIs)	1) In Progress	Hours Hours Staff Training Practices Staff Training Package Phase 3
		6 Improvements in Comment Processing		, rogioso	RAIs, Audits,
		7 Streamlining Administrative Prepublication Reviews			Questions Training on Oversight and Inspections

Availability of Audit

NRC Commission Approval of LR GEIS Rule (August 6, 2024)

NUCLEAR REGULATORY COMMISSION

10 CFR Part 51

[NRC-2018-0296]

RIN 3150-AK32

Renewing Nuclear Power Plant Operating Licenses—Environmental Review

AGENCY: Nuclear Regulatory

Commission.

ACTION: Final rule and guidance;

issuance.

Renewing Nuclear Power Plant Operating Licenses – Environmental Review

- Updates Commission's 2013 findings on the environmental effect of renewing the operating license
- Redefines number/scope of environmental issues addressed during the review of each license renewal application
- Issues Revision 2 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (LR GEIS) (Approved by Commission on May 16, 2024)

ADVANCE Act – Report on Environmental Reviews

<u>Accelerating Deployment of Versatile Advanced</u> Nuclear for Clean Energy (ADVANCE) Act (2024)

NRC to report to Congress on efforts to facilitate efficient, timely, and predictable environmental reviews for nuclear reactor applications for a license under AEA Section 103 (January 2025)



Questions?