

Industry Perspectives on Combined License Applications – Improved Efficiencies & Agility

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Opportunities to Enable Transformation

ADVANCE Act:

- Opportunity for a more modern, nimble, and agile regulator
- Improve NRC efficiencies such as power uprate licensing

Previous Meetings:

- Updated NRC uprate review metrics and guidance
- Combined and sequential licensing (bundling)
- BWR example - MUR, EPU, and MELLA+:
 - Improved efficiencies measured in years through combined licensing
 - Reduced unnecessary burden on both NRC and licensees by using lessons learned from prior applications and operating experience

Modern, Nimble, and Agile Regulatory Processes

Flexible Regulatory Processes:

- Risk mitigation on power uprates using past precedents
- Site-specific plans related to site-specific business cases
- Different approaches for different site/application-specific plans

Flexible Regulatory Approaches for Site-specific Plans:

- Power uprates combined with ATF/LEU+/HBU fuel transitions are new options that need improved licensing efficiencies
- Accommodations for improved efficiencies through flexible licensing pathways for varying site-specific plans

Combined License Applications

IMPROVING EFFICIENCY THROUGH CONDITIONING



Example: Power Uprate & Fuel Transition

- May need to account for High Burnup/Increased Enrichment.
 - Current regulations/guidance do not cover these conditions.
- Use of License Conditions would restrict implementation of methodologies or analyses until a time when the conditions exist to allow their application.
- LIC-101 addresses Obligations as legally binding requirements imposed through applicable rules, regulations, orders and licenses, to be reserved for matters that satisfy the criteria of 10 CFR 50.36 or are otherwise found to be of high safety or regulatory significance.
- Potential for more timely reviews of licensing submittals containing HBU/IE content while maintaining control over when the licensee can implement.

Combined License Applications

IMPROVING EFFICIENCY THROUGH CONDITIONING

- Example of Prior Conditioning Use
 - ◆ 10 CFR 50.69 License Amendments
 - ◆ Approved 10 CFR 50.69 use by the Licensee, but conditioned implementation based on completion of a list of items identified during the review of the request.
- Example Timeline for Implementation with Conditioning
 - ◆ License Amendment Request Submitted in 2025
 - ◆ Amendment issued with License Condition in 2026
 - Implement with conditions
 - ◆ Increased Enrichment Rulemaking Publication in 2027
 - ◆ Once conditions are met, implement full application

