



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

NRR/DNRL and NMSS/REFS

February 13, 2025

# Meeting Agenda

- A. NRC Mission
- B. Monticello SLR Issuance
- C. Staff Requirements Memorandum (SRM-COMCTH-24-0003):  
LR/SLR Expectations (August 8, 2024)
- D. License Renewal Roadmap Update (Safety + Environmental Review)
- E. Progress on Piloting the Tiered Approach
- F. Lessons Learned Series: Proper Use of Industry Documents
- G. Industry Perspectives: Scoping & Screening Review



# NRC Mission Statement



The NRC protects public health and safety and advances the nation's common defense and security by enabling the safe and secure use and deployment of civilian nuclear energy technologies and radioactive materials through efficient and reliable licensing, oversight, and regulation for the benefit of society and the environment.

<https://www.nrc.gov/about-nrc.html>

# Monticello Subsequent License Renewal

Monticello Nuclear Generating Plant, Unit 1, subsequent renewed license was issued December 30, 2024.

The review was completed  
**~7,790 hours underbudget.**



**Monticello SLR Receipt**  
Est: 24,000 hours, 22 months  
**Jan 2023**

**Staff License Renewal Roadmap + Supplement**  
**Mar/Apr 2024**

**Monticello SLR Issuance**  
16,206 hours, 22 months  
**Dec 2024**

**Commission SRM for a Roadmap**  
**Dec 2023**

**Commission SRM**  
14,000 hours, 18 months  
*(for new applications)*  
**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:
  - On progress/metrics
  - Exceedance of 10% of metrics

# Staff's Activities to Meet LR/SLR Metrics + Expectations (SRM-COMCTH-24-0003)



SRM-COMCTH-24-0003		Staff Activities
<b>New Applications Received After August 8, 2024</b>		
1	No more than 14,000 hours and 18-months review	Implementing License Renewal Roadmap + new initiatives
2	30-day acceptance review	Exploring opportunities to shorten acceptance review by 15 days
<b>Current Applications</b>		
3	Adjust to meet new metrics	Reduced hours for two reviews to account for realized efficiencies and issuance of LR GEIS

# Staff's Activities to Meet LR/SLR Metrics + Expectations (SRM-COMCTH-24-0003)

	<b>SRM-COMCTH-24-0003</b>	<b>Staff Activities</b>
4	Applying process improvements + lessons learned	Ongoing
5	Engagement with industry on timing of applications	Ongoing – Last engagement at 12/3/24 SLR Efficiencies Public Meeting
6	Affording credit of operational programs	Ongoing with Tiered Approach
7	Business process improvement exercise to identify + implement additional efficiencies	Planned
8	Reporting to Commission: <ul style="list-style-type: none"><li>• Progress/metrics</li><li>• Exceedance of 10% of metrics</li></ul>	Ongoing progress reports

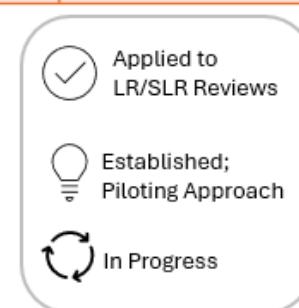


# License Renewal Roadmap

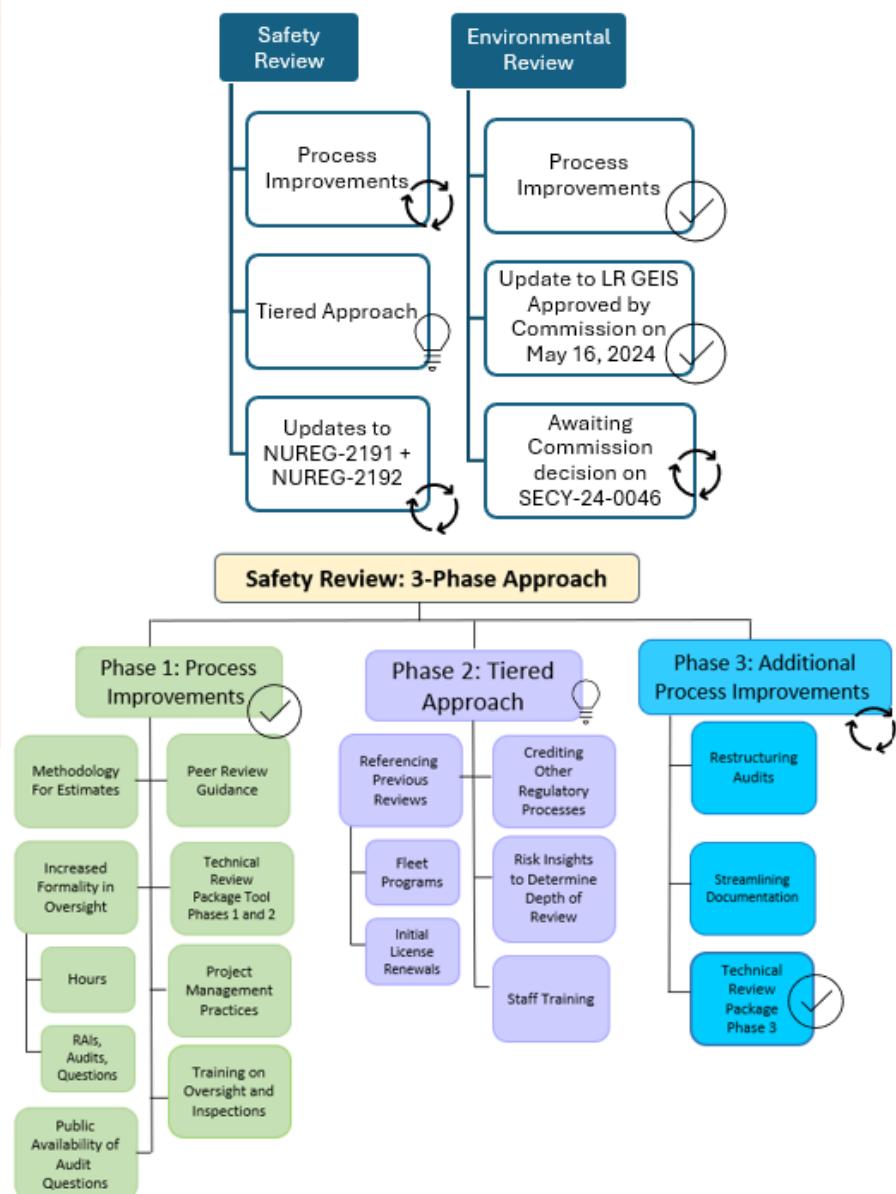
	<b>SECY-24-0026 – Commitments</b>	<b>Date</b>	<b>Status</b>
<b>1</b>	Implementation of License Renewal Roadmap		In Progress
<b>1a</b>	Safety Review		
	• Phase 1: Process Improvements	March 2024	Complete
	• Phase 2: Tiered Approach	April 2024	Complete
	• Phase 3: Additional Process Improvements	Before receipt of next SLR	In Progress
<b>1b</b>	Environmental Review		
	• Process Improvements	Various times, starting Dec 2022	Complete
	• Implementation of LR GEIS <ul style="list-style-type: none"> <li>Process to streamline inflight LR/SLR reviews</li> <li>Implementing streamlining efforts (leveraging Cat 1 issues) for inflight reviews</li> <li>Process to restart paused SLR reviews when LR GEIS in effect</li> </ul>	April 2024 September 2024 September 2024	Complete Complete Complete
	• FRA Requirements <ul style="list-style-type: none"> <li>FRA immediately effective requirements</li> <li>Develop framework for consideration of EAs</li> <li>Pilot for Dresden SLR</li> <li>Additional FRA Actions</li> </ul>	June 2023 June 2024 July 2024 TBD	Complete Complete Complete Under Consideration
<b>2</b>	Launch of public dashboard of updates to the License Renewal Roadmap	August 2024	Complete
<b>3</b>	Issuance of updates to GALL-SLR and SRP-SLR Reports	February and March 2025	In Progress

## Environmental Review: Process Improvements

- 1 Streamline EIS Development
- 2 Agile Methodology for Workload Planning
- 3 Realignment of the ECOE
- 4 Use of Technology Tools to Improve Audits
- 5 Requests for Confirmatory Information (RCIs)
- 6 Improvements in Comment Processing
- 7 Streamlining Administrative Prepublication Reviews
- 8 Assessment of Public Meetings
- 9 Increased Use of Contractor Support for Reviews



# License Renewal Roadmap Dashboard



# Continuous Application & Learning: Tiered Approach (Dresden/Clinton)

## Piloting on Dresden SLR + Clinton LR:

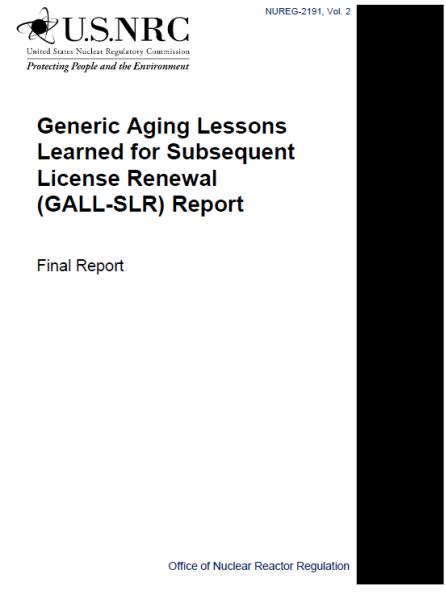
- Ongoing training to staff to support successful implementation
- Gathering internal/external feedback to consider for future modifications
- Continues to inform additional potential improvements

## Reminders:

- Tiering established at the time of acceptance **is subject to change** as the review progresses.
- Clear, transparent, and forthcoming engagements are key to efficiency



# Lessons Learned: Proper Use of Industry Documents



## NRC Observation:

- Recent applicants used revisions/later editions of industry documents, without:
  - **explicitly** identifying in the application
  - providing plant-specific justification
- Resulted in a significant increase in unplanned and iterative interactions between the NRC/applicant

## Path Forward:

- GALL-SLR recognizes use of revisions/later editions of industry documents
  - Approved via:
    - NRC Regulatory Guides, “-A” topical reports, interim staff guidance, or regulations
    - Precedent from previous reviews
  - Otherwise, applicants propose “exceptions” to GALL/GALL-SLR
- Identify in application + provide appropriate level of justification

# Lessons Learned: Proper Use of Industry Documents

## Best Practices:

- Engage early via pre-submittal meetings
  - Discuss plant-specific approaches/situations in detail
  - Obtain early NRC staff feedback
- In the application, explicitly identify differences and describe/justify the document revisions
  - Prevents misunderstanding + eliminates unnecessary, iterative interactions
  - Encourages focused discussion on the technical details
  - Offers transparency in the staff's safety evaluation
- Ensure proper detail is offered on plant-specific parameters, factors, and experience (major contributor to an efficient review)





# Questions?

# Industry Perspectives: Scoping & Screening Review