

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
New Applications Received After August 8, 2024		
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
Current Applications		
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)

	SRM–COMCTH-24-0003	Staff Activities
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">• Progress/metrics• Exceedance of 10% of metrics	Ongoing progress reports



License Renewal Roadmap

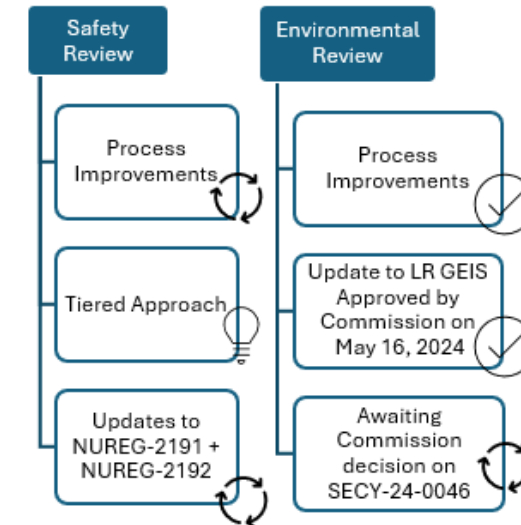
License Renewal Roadmap Dashboard

	SECY-24-0026 – Commitments	Date	Status
1	Implementation of License Renewal Roadmap		In Progress
1a	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
1b	Environmental Review		
	• Process Improvements	Various times, starting Dec 2022	Complete
	• Implementation of LR GEIS		
	◦ Process to streamline inflight LR/SLR reviews	April 2024	Complete
	◦ Implementing streamlining efforts (leveraging Cat 1 issues) for inflight reviews	September 2024	Complete
	◦ Process to restart paused SLR reviews when LR GEIS in effect	September 2024	Complete
	• FRA Requirements		
	◦ FRA immediately effective requirements	June 2023	Complete
	◦ Develop framework for consideration of EAs	June 2024	Complete
	◦ Pilot for Dresden SLR	July 2024	Complete
	◦ Additional FRA Actions	TBD	Under Consideration
2	Launch of public dashboard of updates to the License Renewal Roadmap	August 2024	Complete
3	Issuance of updates to GALL-SLR and SRP-SLR Reports	February and March 2025	In Progress

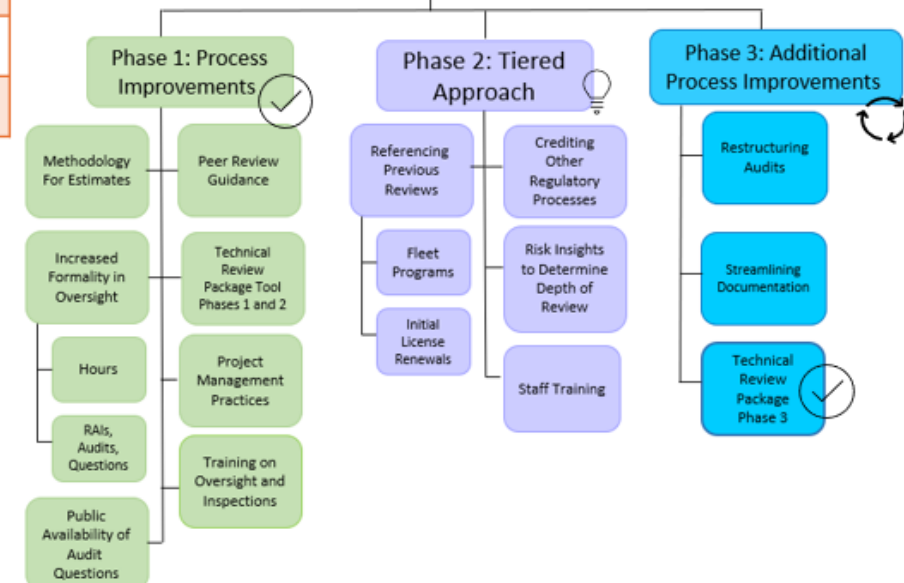
Environmental Review: Process Improvements

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

- Applied to LR/SLR Reviews
- Established; Piloting Approach
- In Progress



Safety Review: 3-Phase Approach



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



Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report

Final Report

Office of Nuclear Reactor Regulation

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