



# **SMR-300 LWA Planning Updates**

August 27, 2025

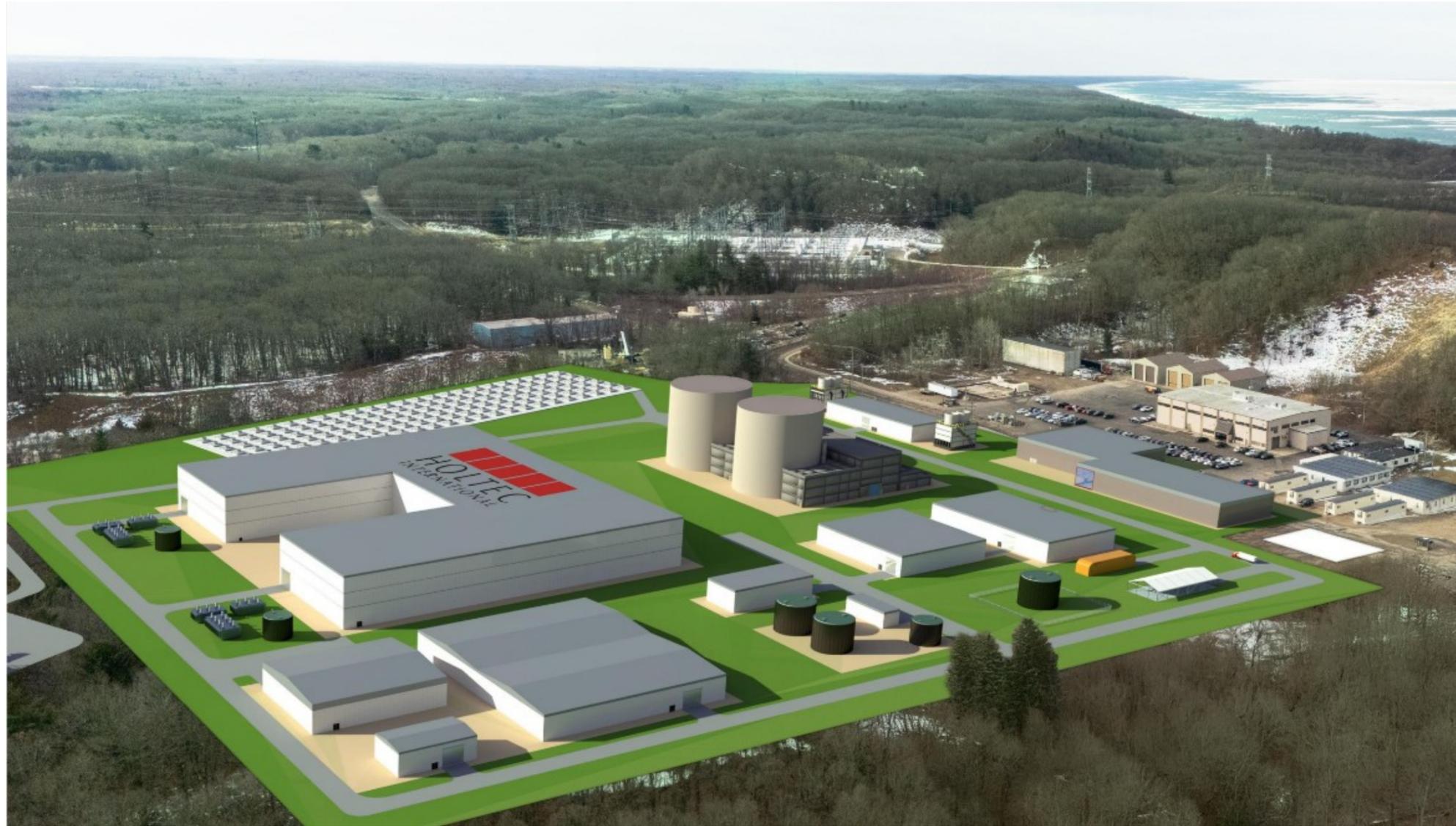
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# Meeting Agenda

- Introductions
- Purpose
- Regulatory Basis
- Planned LWA Activities

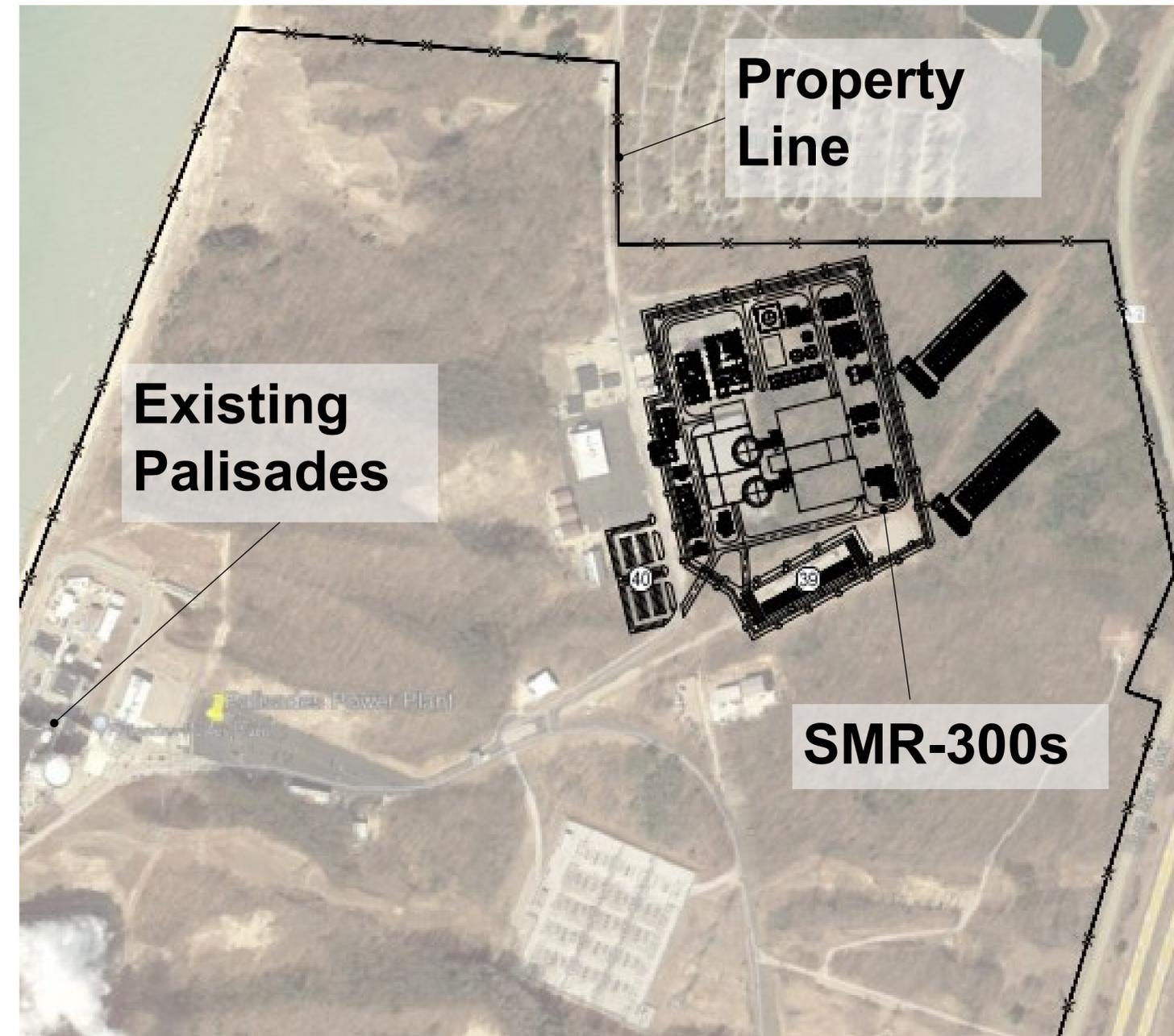


# Purpose

- Communicate SMR's plans for the Palisades SMR LWA

## Reminder – Palisades SMR

- Part 50 licensing pathway
  - ✓ Construction Permit Application (CPA)
  - ✓ Operating License Application (OLA)
- Limited Work Authorization (LWA) as part one of a two-part CPA
- Comprehensive Environmental Report submitted with LWA



# Application Timeline

	2025				2026				2027				2028				2029				2030			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
CPA Part I	<i>Submittal</i>				<i>Approval</i>																			
CPA Part II	<i>Preapplication</i>				<b>NRC Review</b>								<i>Approval</i>											
OLA									<i>Submittal</i>								<b>NRC Review</b>							
													<i>Submittal</i>				<i>Approval</i>							

~14-month “LWA construction window”

# Regulatory History/Basis

- Mar 1972: 50.10(c) defines “commencement of construction” → ■ 37 FR 5745
- Feb 1974: proposed rule creates 50.10(e), “LWA concept” → ■ 39 FR 4582
- Apr 1974: NRC responds to public comments on proposed rule → ■ **SECY-R-74-167**
- Apr 1974: NRC issues final rule → ■ 39 FR 14506
- Oct 2007: 50.10 revised to current text, established current LWA process → ■ 72 FR 57416

## **SECY-R-74-167 discusses the basis for the LWA rule**

- Encl 2, Page 8: “There is... a strong incentive to ensure that the rule establishing LWAs incorporates *sufficient critical path work to effectively utilize the time saving* that an LWA offers.”
- Encl 2, Page 12: “Thus, provision has been made... to ensure *maximum effective use of the potential time saving* offered by the LWA concept.”
- Encl 2, Page 15: “The optimum course of action is one that results in the issuance of LWAs that include a *well-defined scope of work large enough to take advantage of the potential time saving...*”

# 1974 Regulations

## ■ Allowable LWA activities:

### ✓ “LWA-1” - 50.10(e)(1):

- Site preparation
- Construction support facilities
- SSCs not subject to 10 CFR 50 Appendix B (i.e., non-safety-related SSCs)

### ✓ “LWA-2” – 50.10(e)(3):

(for safety-related SSCs)

- Subsurface preparation
- Installation of foundations

\*(SSCs: structures, systems, and components)

## Current Regulations (2007 Rule)

### ■ Allowable LWA activities under current 50.10(d)(1):

- ✓ Driving of piles
- ✓ Subsurface preparation
- ✓ Placement of backfill, concrete, or permanent retaining walls within an excavation
- ✓ Installation of foundations

# Development of 10 CFR 50.10

Regulation	Onsite Activities Allowed <u>Without</u> NRC Approval	Onsite Activities Allowed <u>With</u> an LWA
1972 rule	Site exploration	N/A – LWA did not exist Exemptions could be considered
1974 rule	Same as 1972	All non-safety-related work* ("LWA-1" activities) Installation of safety-related foundations ("LWA-2" activities)
2007 rule	All "non-construction" activities defined in 50.10(a)(2)	Installation of safety-related foundations

\*50.10(e)(1)(v) allowed "the construction of structures, systems, and components which are not subject to the provisions of Appendix B."