

**RECOMMENDATIONS FOR IMPROVING  
NUCLEAR POWERPLANT LICENSING**

**Policy Statement**

In its continuing efforts to improve the effectiveness and efficiency of Nuclear Regulatory Commission (NRC) licensing activities consistent with providing increased opportunity for the public to participate in the licensing process, the Commission requested a staff study of the lessons learned in nuclear power plant licensing since the NRC was created. The results of this study were published in June 1977 as NUREG-0292, "Nuclear Power Plant Licensing: Opportunities for Improvement." A press release was issued on July 27, 1977, which summarized these recommendations, noted public availability of the report, and indicated that the Commission had directed the staff to prepare a plan to implement these recommendations.

It is the intent of the Commission to implement the following recommendations of NUREG-0292 on an experimental basis whenever opportunities arise and it is practical to do so on both currently docketed and forthcoming applications. The recommendations will be implemented as a collective set if possible; however, implementation of any single recommendation will be undertaken if the staff believes a productive result will be achieved.

**RECOMMENDATION No. 3**

**INCREASE PRETENDING COORDINATION  
WITH APPLICANTS**

The expanded pretending coordination with applicants has as its objective the subsequent filing of an application that is of such quality as to minimize the need for extensive requests for additional information, clarification, or design or procedural commitment that often result in considerable delay in the review of an application after docketing. The expanded pretending activities will be initiated about 9 months prior to the proposed tendering of an application and will be designed to provide additional guidance and direction to the applicant during the preparation of its application. The increased coordination activities during this period will include several working level meetings between the applicant and the staff to provide specific updated guidance to the applicant regarding the format and content of the application and to provide an opportunity to discuss key aspects of the design, relevant problems, and current staff positions.

**RECOMMENDATION No. 4**

**EXPAND AND RESTRUCTURE THE  
ACCEPTANCE REVIEW**

The present acceptance review program was initiated following publica-

tion of the Standard Format and Content document in 1972 and provided the staff with a standard by which to determine whether a tendered application was sufficiently complete to permit docketing and detailed review. The Acceptance Review will be expanded to emphasize the quality of the material presented as well as completeness.

The expanded and restructured Acceptance Review has as its objective the assurance that all significant information needed by the staff for the preparation of its Safety Evaluation Report will be in the docketed application. During the acceptance review, the staff will examine the information provided in the tendered application to determine that it includes most, if not all, of the information that is generally presently available in an application only after it has been amended to include the additional information developed in response to the staff's first round of questions after the application is docketed.

This expanded and restructured Acceptance Review in conjunction with the proposed increased pretending coordination activities should result in a significant reduction, if not elimination, in the need for repetitive and time-consuming question and answer cycles subsequent to docketing.

**RECOMMENDATION No. 5**

**MODIFY CURRENT REVIEW PROCESS BY  
DEVELOPING EARLY SAFETY EVALUATION  
REPORT**

In order to achieve the full measure of the benefits envisioned in implementing Recommendations No. 3 and No. 4, the present safety review sequence will be altered somewhat in this experimental program. Because of the increased pretending coordination with applicants and the expanded and restructured Acceptance Review, it is expected that the two rounds of questions which are a part of the present review sequence would be essentially eliminated, and the review would be performed on the basis of the contents and quality of the application as docketed and supplemented by the applicant's responses to the staff questions asked during the expanded and restructured Acceptance Review. The staff's positions would be reflected in a Safety Evaluation Report which would be issued within about 6 months of docketing.

After evaluating the results of this experimental program, appropriate changes will be made to pertinent staff documents concerning procedures and practices in licensing reviews. If required, changes to Commission rules and regulations will be initiated. Pending any changes in the regulations after this evaluation, it is the intent of the Commission to proceed with the Acceptance Reviews of any applications, involved in the experimental program and where Recommendation 4 is to be implemented, on a case-by-case basis notwithstanding the provisions of the current regulation in 10 CFR 2.101 concerning the time limit and content of Acceptance Reviews.

In addition, the Commission has directed the staff to implement Recommendation No. 6:

**INCREASE PUBLIC PARTICIPATION DURING  
STAFF REVIEW**

Although the hearing process provides an opportunity for public participation, there is very little practical opportunity for interested members of the public, particularly those in the vicinity of the proposed site, to become aware of the staff's role during review of construction permit applications. It is the intent of the Commission to provide increased opportunity for the public to observe and participate in the licensing process in a meaningful way without imposing an undue burden upon the resources of staff manpower.

While the most efficient way to handle interaction of the staff with the applicant on licensing matters is to hold meetings in Bethesda where it is possible to have access to various elements of the staff, the costs and distance make it almost impossible, except for certain well-established intervenor organizations, for members of the public living near the proposed site to participate in these meetings. On the other hand, to arrange all such meetings near the proposed plant site would impose significant burdens upon the staff without necessarily providing commensurate improvement in public understanding of the licensing process.

Past experience with staff interaction with the public has shown that:

(1) The public appears to be most interested in the licensing process in the pre-docketing and/or early stages of the review.

(2) The number of people who attend public meetings appears to be directly correlated with the time of day at which the meetings are held. Past experience has shown that many more people attend meetings held in the evening than during the working day.

Based on the above considerations, a number of working meetings between the staff and construction permit applicants, both prior to and after docketing of an application, normally held at Commission offices in Bethesda, Md., will be held in the vicinity of the proposed site. Whenever possible, these meetings will be held in the evenings or on weekends.

These meetings will provide an opportunity for interested members of the public to listen to the staff and applicant discussions and observe the staff's role in the review of applications. Appropriate provisions will be made for public comments and questions and responses by the applicant and the staff.

Recommendation No. 6 is to be implemented by the staff to the extent permitted by resource considerations on all ongoing and future license application reviews. In this respect, it differs from the implementation of Recommendations No. 3, 4, and 5, which are being conducted on an experimental basis for selected applications.

Finally, whatever improvements that accrue in efficiency as a result of these recommendations will not be permitted to reduce the quality of the licensing review.

Future statements concerning the other recommendations of NUREG-0292 will be issued as appropriate.