Nuclear Regulatory Commission
Office of New Reactors
NRO Office Instruction

Office Instruction: **NRO-REG-100**

Office Instruction Title: **Acceptance Review Process for Design Certification and Combined License Applications**

Revision Number: **DRAFT 01, For Use and Comment**

Effective Date: **1/07/08**

Primary Contact: **Stephen S. Koenick, NRO/DNRL**
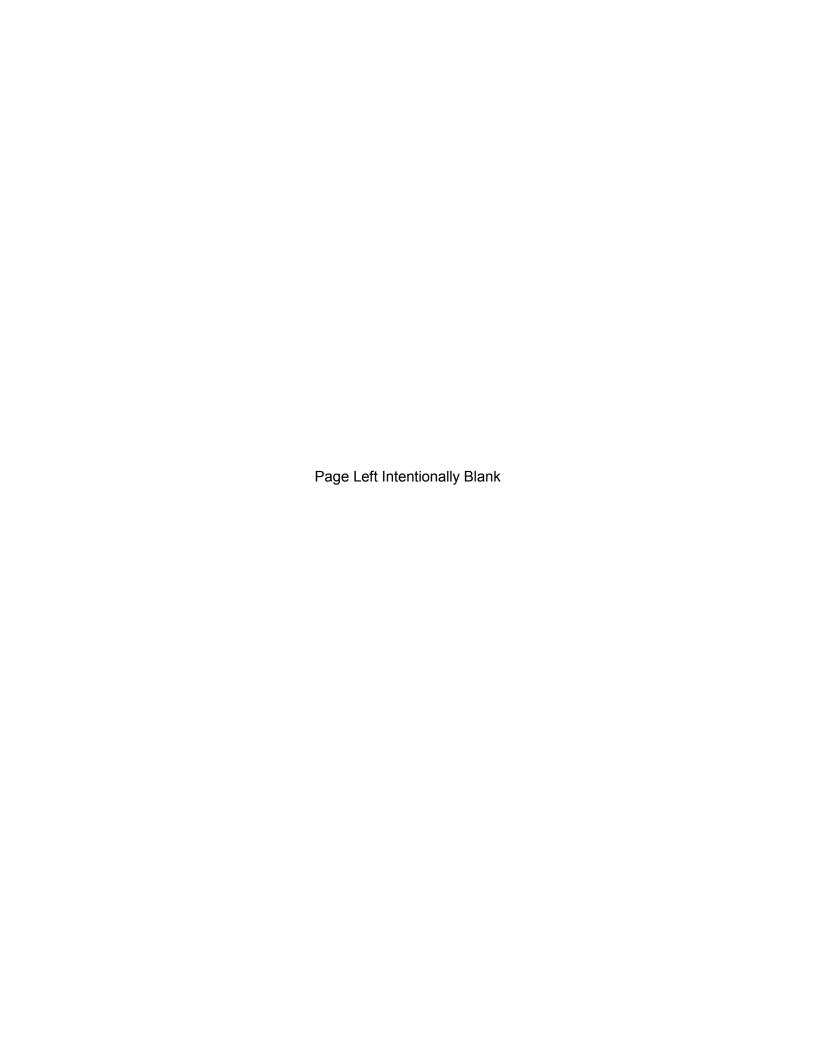
Responsible Organization: **NRO/DNRL**

Summary of Changes: This revision is being issued as Draft for Use and Comment. The draft includes a number of editorial and other changes for clarification and for process streamlining. Of particular note are the following: a new docketing option without issuance of a schedule based on lessons learned from South Texas Project acceptance review; a new sub-section 3.2.1 Administrative Processing in the body; clarification regarding inclusion of Table 1 within the acceptance review transmittal memo. Additional guidance is included to address design certification, combined license application referencing a design certification being reviewed in parallel, and subsequent combined license application – specific review guides provided as attachments. Attachments E and F dealing with reference COLAs where a DC is still under review, Attachment G to address SCOL applications, and Attachments H and I address DC applications.

Training: Email; division and branch presentations as requested

ADAMS Package Accession No.: ML073551155

Concurrences		
Primary Office Owner	Office of New Reactors	
Primary Contact	Stephen Koenick	1/07/08
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OFFICIAL RECORD

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NRO Office Instruction
NRO-REG-100

Acceptance Review Process for Design Certification
and Combined License Applications

1.   PURPOSE

The purpose of NRO-REG-100, "Acceptance Review Process for Design Certification and Combined License Applications," is to provide guidance to the staff who conduct acceptance reviews for design certification (DC) and combined license (COL) applications submitted under Title 10, Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants," of the *Code of Federal Regulations* (10 CFR Part 52).

2.   GENERAL REQUIREMENTS

The regulations in 10 CFR Part 2 prescribe the requirements for determining the acceptability of an application. In accordance with 10 CFR 2.101(a) or Section 2.815, a COL or a DC application will be assigned a docket number after the tendered application has been evaluated for completeness. Only then will the technical review be initiated by the staff. The determination of acceptability for docketing is generally made within a period of 30 days. In addition, Section 2.101(a)(5) allows for a COL application to be submitted in two parts. One part shall be accompanied by the information required by 52.80(b). The other part shall include the information required by 52.79 and 52.80(a). Whichever part is filed first shall also include the information required by 10 CFR 50.33, 52.79(a)(1), and 50.37. One part may precede or follow other parts by no longer than 18 months. Each part of the tendered application will receive an acceptance review and can be docketed.

In Staff Requirements Memorandum for COMDEK-07-0001/COMJSM-07-0001 - Report of the Combined License Review Task Force, dated June 22, 2007, the Commission directed the staff to determine acceptability of COL applications on the basis of the technical sufficiency as well as its completeness within a period of 60 days. This office instruction provides the guidance and criteria to be used in this expanded review. This expanded acceptance review will also be used to confirm planning assumptions (i.e., resources and schedule associated with the application review).

The staff conducts a completeness review to ensure that the applicant has submitted all of the information required by the applicable regulations in Part 52,[1] such that the staff can begin its detailed technical review. For a COL application (COLA), the staff will utilize Regulatory Guide (RG) 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)," in performing its completeness review. Specifically, Regulatory Position, Part IV of the RG

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[1]The required information varies by type of licensing process: Subpart B, "Standard Design Certifications," and Subpart C, "Combined Licenses."

provides a COLA acceptance review checklist for the staff to follow in determining the completeness of the application. The staff should note that previously certified design information that may be referenced in a COLA is not within the scope of a COLA acceptance review (or the technical review itself). For a DC application, the staff will use the checklist provided as Attachment I to this office instruction.

In accordance with the referenced Commission policy, during the acceptance review, the staff also conducts a technical sufficiency review to ensure that the application contains sufficient technical information in scope and depth for the staff not only to begin its detailed technical review but to complete it within a predictable timeframe. Regulatory Position Parts I though III of RG 1.206[2] provide guidance to the applicant regarding the expected contents of the application. The Standard Review Plans (SRPs) NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," and NUREG-1555, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants," provide guidance to the technical staff on performing their safety reviews of applications to construct and operate nuclear power plants and applications to approve standard designs and sites for nuclear power plants. These guidance documents should be used in part to evaluate and determine technical sufficiency. However, the staff should not perform its detailed technical review until after the application is docketed. Implementation of this acceptance review policy is expected to foster the development of a high quality application for docketing and should therefore reduce the number of requests for additional information (RAIs).

In consideration of magnitude of prospective COLAs the NRC may receive, the staff has developed a design-centered-review approach (DCRA).[3] With the DCRA, staff decisions made on the "reference COL" would apply to all "subsequent COLs." Therefore, during performance of an acceptance review of a subsequent COLA, the staff is expected to verify the degree of standardization to the reference COL but focus its review on site-specific, application specific issues.

In addition, the Commission's Final Policy Statement on the Use of Probabilistic Risk Assessment Methods in Nuclear Regulatory Activities (FR, Vol. 60, p. 42622, August 16, 1995) states, "The use of PRA technology should be increased in all regulatory matters to the extent supported by the state-of-the-art in PRA methods and data and in a manner that complements the NRC's deterministic approach and supports the NRC's traditional defense-in-depth philosophy." To the extent available, application of risk-insights to the acceptance review will occur during the technical sufficiency review and will allow for risk insights to be factored into determining the scope of technical review if the application is docketed.

NRO has prepared prebaseline review schedules for each application based on design centers as captured within the Enterprise Project Management (EPM). These prebaseline schedules contain estimated staff-hours to conduct the review based on the anticipated scope of review (e.g., for a COLA referencing a DC, the review hours are reduced to a minimal review effort for

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[2] RG 1.206 provides the scope of information for a COLA, where as a DC application is expected to complete information related to the design; therefore, the design-related sections of RG 1.206, Regulatory Position Part I is relevant for a DC application.

[3]Additional information on DCRA is provided in SECY-06-0019, dated January 31, 2006.

areas incorporated by reference to the DC. Similarly, a subsequent COLA is expected to need fewer staff-hours than the reference COL.) These schedules are utilized for all planning assumptions. The acceptance review provides the opportunity to identify potential changes to the schedule and review hours based on insights gained from this front end look at the applications. At the completion of the acceptance review, a baseline review schedule with adjusted staff-hours will be developed for the technical review of the application.

NRC inspectors from the Quality and Vendor Branches (CQVB/CQVP) may conduct an audit of the preparation of the application to support the acceptance review in accordance with NRC Inspection Manual Chapter (IMC) 2502, "Construction Inspection Program: Pre-Combined License (Pre-COL) Phase." The results of this audit may inform the acceptance review. This audit will typically be conducted within 30-60 days before the application is scheduled to be submitted to the NRC. Through implementation of IMC 2502, Project Managers (PMs) and technical staff may participate in the audit to assess the content of the application within their purview. Observations of the review of the completed portions of the application against RG 1.206 will be compiled from the audit and provided to individuals performing the acceptance review of the application. Issues from these observations will be documented in the audit report. In addition, staff will also consider auditing the applicants PRA at this time to support the use of risk-insights during the acceptance review.

3.   SPECIFIC REQUIREMENTS

3.1   Responsibilities

3.1.1 Project Management

Projects

The Lead PM in the design-specific project branch within the Division of New Reactor Licensing (DNRL)

- Coordinates activities associated with NRO-REG-100.
- Performs administrative activities associated with the acceptance review.
- Reviews assigned sections to evaluate the completeness and technical sufficiency of the application.
- Performs interactions with stakeholders in accordance with applicable NRC procedures.
- Manages acceptance review activities via the EPM.
- Compiles inputs from all technical branches.
- Refers technical staff to CQVB/CQVP audit report, if available.
- Refers technical staff to risk-insights, if available.
- Briefs management on results and recommends acceptability of application for docketing to Division management (NRO and NSIR).
- Supports the technical staff by reviewing the application for completeness.

The DNRL Projects Branch Chief

- Evaluates the overall application acceptability based upon the results of the PM's and technical staff's review for completeness and technical sufficiency.
- Briefs senior management on the status and findings of the review.
- Issues results of review, Federal Register Notice/Letter to applicant. For docketed applications, this includes an application-specific technical review schedule.

Environmental

The Environmental PM in the Environmental Projects Branch (RAP1/RAP2) within the Division of Site and Environmental Reviews (DSER)

- Coordinates activities associated with NRO-REG-100 related to the environmental review for a COLA.
- Coordinates activities associated with NRO-REG-100 related to the environmental review for a DC application as limited to the severe accident mitigation design alternative (SAMDA) review.
- Supports the Lead PM in performing administrative activities associated with the acceptance review.
- Reviews Environmental Report to evaluate the completeness and technical sufficiency of the application.
- Compiles environmental inputs from assigned technical branches.
- Provides results of environmental report acceptance review to Lead PM
- Supports management briefings of acceptance review results.

The DSER Projects Branch Chief

- Evaluates the environmental report acceptability based upon the results of the PM's and technical staff's review for completeness and technical sufficiency.
- Supports management briefings of acceptance review results.

Planning and Scheduling

The Planning and Scheduling Branch (NPLS) PM

- Prior to receipt of application, develops/loads EPM with prebaseline review schedule.
- Inputs changes into EPM prebaseline review schedule to determine effect of acceptance review on baseline review schedule.
- Coordinates with projects branch and appropriate technical branches in reviewing potential changes to the pre-baseline schedule.
- Briefs management on potential changes from the pre-baseline schedule to the baseline review schedule.
- Finalizes the baseline review schedule following management review and approval.
- Captures dependencies among concurrent review activities (e.g., review of a DC application in parallel with the review of a COLA) within the baseline review schedules.

3.1.2 **Technical Branch**

The Technical Staff - NRO and other offices as assigned
[Technical assistance from appropriate contractors may be used to perform portions of the acceptance review as long as the prescribed acceptance review schedule can be maintained.]

- Before beginning the acceptance review, becomes familiar with the anticipated scope of review (e.g., applicable sections of RG 1.206, the SRP, and for a COLA referencing an AP1000 or ABWR DC, the design-specific finality matrix) and the EPM pre-baseline review schedule and estimated staff-hours.
- Reviews assigned sections to evaluate the completeness and technical sufficiency of the application.
- Obtains input and support from outside entities (e.g., FEMA, DHS, Corp of Engineers, EPA, USGS, etc.) to support the completeness and technical sufficiency review of applicable sections and for the development of the baseline review schedule.
- Identifies changes from the pre-baseline review schedule and estimates hours to be factored into the baseline review schedule.
- Identifies any known dependencies among concurrent review efforts (e.g., review of a DC application in parallel with the review of a COLA).
- Communicates results of acceptance review and proposed changes to the pre-baseline review schedule and estimated staff-hours to projects.
- The Probabilistic Risk Assessment (PRA) Licensing, Operations Support and Maintenance Branch (SPLA/B) staff will review the application and identify the risk-significant structures, systems, and components (SSCs) and share this with the technical staff through projects early during the conduct of the acceptance review. The technical staff should use this risk information when appropriate to inform the outcome of the acceptance review.
- CQVB/CQVP will provide audit insights, as applicable.
- Expends no resources on the technical review during the acceptance review process.

The Technical Branch Chief

- Reviews and evaluates the significance of technical issues and the results of the staff's acceptance review and confirms that any identified technical deficiencies fall into the scope of the acceptance review (rather than the scope of the technical review).
- Promptly communicates potential issues to projects and upper management, when identified, early in the acceptance review.
- Communicates to projects proposed changes to the pre-baseline review schedule and estimated staff-hours on a timely basis.
- Forwards acceptance review results via memorandum (Attachment A) to both Projects and NPLS.
- Supports management briefings of acceptance review results.

3.1.3 **NRO/NSIR Management**

- Receives briefing on results of acceptance review.
- Provides consultation for not accepting the application.

3.2   **Acceptance Review**

The acceptance review includes three parts: (1) administrative processing, (2) the technical staff portion of the acceptance review (completeness and technical sufficiency review, confirmation of planning assumptions, and identification of dependencies among concurrent reviews) and (3) the compilation of acceptance review inputs from the technical branches that support the NRC's decision to docket an application. An example acceptance review schedule containing these three steps is shown in Attachment B.

3.2.1   **Administrative Processing**

Administrative processing includes receiving, staging, and noticing the application. The application is provided to [OIS] for processing in ADAMS. The Lead PM as supported by the Environmental PM performs a Sensitive Unclassified Non-Safeguards Information (SUNSI) review in accordance with the interim guidance provided on the internal web http://www.internal.nrc.gov/ois/divisions/irsd/sunsi/index.html. Questions on SUNSI reviews are directed to NRO_Inforeview@nrc.gov. As applicable, the Lead PM reviews the applicant's request to withhold proprietary information from public disclosure[4] in accordance with NRR Office Instruction, LIC-204, "Handling Requests to Withhold Proprietary Information from Public Disclosure." The tendered application should be made publicly available after the SUNSI review. The proprietary review should be completed as soon as practicable—however, this review may be completed after the conclusion of the acceptance review. Administrative templates are located within ADAMS folder NRO/NRO-DNRL/Templates.

The acceptance review will be conducted in parallel with the administrative processing steps and can begin after the application is available in ADAMS.[5] Once the technical staff completes the acceptance review, each Technical Branch Chief documents the acceptance review findings by memorandum that is sent to the appropriate projects branch chief. Attachment A contains a template memorandum that should be used by the Technical Branch Chiefs to transmit their acceptance review results.

The Lead PM compiles all of the inputs from the technical branches, develops a report summarizing the outcome of the acceptance review and recommends whether the application is acceptable for docketing. Note: the environmental PM compiles the inputs related to the environmental report review and transmits the information to the Lead and NPLS PMs. The Lead PM informs the DNRL Project Branch Chief of the results. Concurrently, the NPLS PM will review the list of information contained in the report to evaluate potential impacts to the baseline review schedule. Sections 3.3 and 3.4 provide more details on these parts of the acceptance review.

Early and frequent communication is essential for meeting the Agency's objective for openness with all stakeholders. Throughout the acceptance review, the Lead PM should maintain

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[4]For a design certification rulemaking, all primary sources (e.g., the design control document) must be publicly available.

[5] The timeframe associated with availability in ADAMS is approximately 2 days.

communications with the applicant regarding identified acceptance review issues in accordance with applicable NRC procedures.

3.2.2 **The Technical Staff Portion of the Acceptance Review**

To perform the technical staff portion of the acceptance review, the assigned technical staff should use the attached application-type specific acceptance review guides (see Attachments C through H). A general description of the completeness and technical sufficiency review, confirmation of planning assumptions, and identification of dependencies among concurrent reviews is provided below.

- Attachment C is for a COLA acceptance review;
- Attachment D is for an Environmental Report (ER) submitted as part of a COLA acceptance review, this can be used on a limited basis for an ER submitted as part of a DC as it relates to SAMDA reviews;
- Attachment E supplements Attachment C for a COL referencing a DC that has not been certified;
- Attachment F supplements Attachments C and E for a COL referencing a DC that has not been certified, and references an ESP;
- Attachment G supplements Attachments C and E for a subsequent COL (SCOL); and
- Attachment H is for a DC application acceptance review.

Completeness and Technical Sufficiency Reviews

The completeness portion of the acceptance review verifies the application contains all of the information required by applicable regulations. For a COLA, the completeness review is conducted by the PM and technical staff by comparing the information in the application against the checklist provided in Section C.IV.1, "Combined License Application Acceptance Review Checklist," of RG 1.206 and the guidance in the appropriate SRP (NUREG-0800 or NUREG-1555) section(s). For a COLA referencing a DC, the applicant is also required to address all COLA specifics such as COL information and action items, as well as identified departures from the certified design.   Although an applicant is not required to conform to the guidance provided in RG 1.206, the checklist will facilitate both the preparation of an application by the applicant and the timely review of the application by the NRC staff. While the checklist is intended to cover all current regulations pertaining to an application, the application must address any omissions or new regulations in effect after the guide was issued. The associated DC application acceptance review checklist for completeness with applicable regulations in 10 CFR 52.47 is provided as Attachment I to this office instruction.

As part of the determination of completeness, the staff should review Chapter 1 of the final safety analysis report (FSAR) included in the COLA or a DC application. This chapter is expected to provide useful information addressing general regulatory considerations including conformance with the SRP and Regulatory Guides, operating experience and identification of new safety features. In addition, for a COLA referencing a DC or a DC and an ESP, Chapter 1 of the FSAR should identify departures from the DC and treatment of COL information or action items. The staff should also review Chapter 2 of the FSAR which is expected to provide information on how site parameters fall within site characteristics. Specific technical section(s)

of the FSAR or other portions of the COLA will support in more detail the information in Chapters 1 and 2.

Note that for a COLA, the applicant must describe certain operational programs, such as in-service inspection, in-service testing, fire protection, and equipment qualification, and must provide implementation milestones. From SECY-05-0197, "Review of Operational Programs in a Combined License Application and Generic Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria," as approved in the associated staff requirements memorandum (SRM) dated February 22, 2006, "'fully described' should be understood to mean that the program is clearly and sufficiently described in terms of the scope and level of detail to allow a reasonable assurance finding of acceptability. Required [operational] programs should always be described at a functional level [in the application] and at an increased level of detail where implementation choices could materially and negatively affect the program effectiveness and acceptability."

For the technical sufficiency portion of the acceptance review, the staff evaluates the application in terms of expected content identified in RG 1.206 and guidance in the related SRP sections. Thus, the staff verifies that the application contains sufficient technical information in scope and depth to begin and complete the detailed technical review within a predicable timeframe. Reviewing for technical sufficiency enables the staff to identify significant deficiencies in the application which would preclude the staff from starting its technical review; or that would potentially require significant time and resources to resolve, and could challenge the ability for staff to reach its reasonable assurance finding in a predictable timeframe.

As stated in the General Requirements section, above, with the DCRA, staff decisions made on the reference COL (RCOL) would apply to all subsequent COLs (SCOLs). Therefore, during performance of an acceptance review of a SCOLA, the staff is expected to verify the degree of standardization and consistency of the application with the RCOL, but should focus its acceptance review on site-specific, application specific issues. See Attachment G for supplemental acceptance review guidance.

Risk insights, when available,[6] should be used during the acceptance review to help determine the scope of the technical sufficiency review. Staff should focus its technical sufficiency review on systems, structures, and components (SSCs) that have been identified as risk-significant. In addition, for identified technical deficiencies, technical staff should identify in consultation with SPLA/B, as necessary, whether they are risk significant (i.e., whether the technical deficiency is related to a risk-significant SSC).

A list of review areas contained within the SRP that may potentially involve more detailed technical review (e.g., involve computer code evaluation, detailed data analysis, new safety

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[6]Risk-insights from an ongoing or completed DC application review should be available for a design center. For the acceptance review of a DC application or a COLA submitted concurrently with a referenced DC, SPLA/B will review the applicant's summary of its PRA and its results for identification of SSCs that have been identified as risk-significant as part of the acceptance review or under pre-application audit. The timeframe in which the risk insights are reviewed and distributed among the staff will determine the extent to which risk-insights can inform the scope of the acceptance review.

feature, or emerging operating experience) has been developed[7] and is available in ADAMS (ML072430683). These review items should be factored into the technical sufficiency review and confirmation of planning assumptions–development of the baseline schedule and adjusted staff-hours.

An environmental acceptance review checklist has been developed and is also available in ADAMS (ML072250354). This list should be used to help determine technical sufficiency for the environmental review areas and is a comprehensive set of review issues based on RG 4.2 and NUREG-1555 applicable to both early site permit and COL applications.

During the completeness and technical sufficiency reviews, technical staff should discuss identified deficiencies with branch chiefs and notify projects of the significant deficiencies when identified. These significant deficiencies will be discussed with the applicant in accordance with applicable NRC procedures. Following completion of the acceptance reviews, the technical branches document their findings using Attachments C and D, as appropriate, and transmitting them to the Lead PM using the technical branch memo (Attachment A) discussed above in Section 3.2.1.

Confirmation of Planning Assumptions

During the 60-day acceptance review, technical staff should compare the results of the acceptance review against the EPM pre-baseline review schedule and estimated hours.

The pre-baseline review schedule may not account for the review of:

- Alternatives to SRP acceptance criteria and Regulatory Guides,
- New safety features,
- Deviations from the DC, for a COLA referencing a DC, or
- Application-specific information in a standardized section for a subsequent COLA as compared to the reference COLA.

If changes to the pre-baseline review schedule are needed, technical staff should project the new review time in terms of changes to the staff hour estimates for the FSAR section[8] or environmental impact statement (EIS) issue area section in the EPM, and not the individual review area/topic. See Table 2, "Resource Plan Revisions," included in Attachments C and D. Furthermore, the revised estimates should be divided into the applicable review phases captured in the EPM (e.g., for the safety review: Phase 1 - PSER and RAIs, Phase 2 - SER with Open Items). Note that changes in estimates would not be a reason for not accepting an application, but would be considered in the development of the baseline review schedule.

The technical staff should discuss with their supervisor any resource implications associated with a change from the EPM pre-baseline review schedule. Schedule implications (e.g.,

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[7]Not all of the SRP sections are represented in the list. The list will be updated to reflect lessons learned from the initial COLA acceptance reviews.

[8]In most cases, the FSAR section has a corresponding SRP section, but there may be some exceptions in which assigned work does not have a direct correspondence to an SRP section.

whether the pre-baseline schedule will have to be adjusted - see Section 3.4, below) will be assessed by NPLS and the projects branches for the overall application once the technical branches have completed their acceptance reviews.

Identification of Dependencies among Concurrent Reviews

The technical staff should identify any known dependencies among concurrent reviews. An example of a dependency is as follows. If the staff has identified an issue with a DC review area, the resolution of that issue could affect the review of the COLAs that reference the DC especially if the review area is incorporated by reference to the DC. For the environmental review, these dependencies may include regional or generic implications, or other environmental assessments at the same site. These dependencies should be identified by the technical staff to assist the integrated management of the concurrent reviews, such that a slippage in the DC application review schedule will be evaluated for possible impacts to the COLA review schedule. These dependencies could potentially result in changes to planning assumptions for other COLA or DC applications.

3.3   **Integrating Results of Completeness and Technical Sufficiency Reviews**

The Lead PM will compile the results of the acceptance reviews which are documented in the technical branch memoranda (Attachment A) and distributed electronically. The NPLS PM in consultation with the lead PM will revise the prebaseline review schedule using conclusions from the technical branch's acceptance review.

Completeness and technical sufficiency are factored into the NRC's decision of whether to docket an application. As discussed above, if an application is being considered as not acceptable for docketing, the projects branch should inform senior management, as soon as practical.

The possible outcomes of the completeness and technical sufficiency portions of the acceptance review are as follows:

Acceptable for Docketing - The staff has determined that the application contains sufficient information for the staff to begin its technical review; therefore, it is acceptable for docketing. The Lead PM communicates the status and results of the acceptance review internally and externally in accordance with applicable NRC procedures.

Following this determination, the NPLS PM will develop the baseline review schedule and adjusted staff-hours. See Section 3.4.

Application not Acceptable for Docketing - The application is not sufficiently complete to start the detailed technical review and/or complete the review within a predictable timeframe. The significant technical deficiencies are documented in the technical branch memos.   Upon interactions with the applicant during the acceptance review, the staff may determine that the applicant can address and has committed to providing the missing information within a mutually agreed timeframe by supplementing the application. During this period of time, the application will be considered to be tendered but not docketed. The application will be docketed and the review commenced <u>after</u> the staff has reviewed any supplements and concluded that the

application is sufficiently complete to start the detailed technical review and complete the review within a predictable timeframe. A baseline review schedule will be transmitted to the applicant once the supplement has been determined to be acceptable. If the staff determines that due to the high complexity or large volume of missing information in the application, the applicant cannot provide the NRC with the necessary information, the staff can issue a letter of non-acceptance, or the applicant can choose to withdraw its application. The staff should communicate the deficiencies to the applicant in accordance with applicable NRC procedures. The applicant can choose to resubmit their application once the deficiencies are corrected. However, the NRC will conduct a limited acceptance review of the new or modified submitted information. (This limited acceptance review should be completed in less than 60 days.)

Once a determination that an application can not be docketed, the lead PM and the DNRL Projects Branch Chief should promptly communicate this to senior management and the technical staff. This will ensure that no resources will be expended on the technical review of the application.

3.4 **Adjustments to Baseline Review Schedule and Estimated Staff-hours**

The NPLS PM develops the baseline review schedule and adjusts the staff-hours based on the identified changes from the EPM prebaseline review schedule and estimated hours. The NPLS PM should also capture review dependencies within the baseline review schedule. The review schedule could be one of the following:

A. Baseline Schedule - The application is sufficiently complete to begin a detailed technical review (DC or COLA) and complete it within a predictable timeframe. There are no significant departures from the DC, and there are no apparent unique technical issues. This does not preclude staff's use of RAIs (i.e., multiple rounds of RAIs are not anticipated) during the evaluation. A baseline schedule (e.g., for a COL referencing a DC, the prebaseline schedule is typically 30 months from docketing the application) can be transmitted to the applicant.

B. Baseline Schedule Adjusted from Pre-baseline Schedule - The application is sufficiently complete to begin a detailed technical review (DC or COLA) and complete it within a predictable timeframe. There may be departures from the DC, new safety features, or alternatives to the SRP and/or RG 1.206 guidance; however, the applicant provided sufficient level of detail for the staff to begin its review. The staff has identified new methodologies in the application, supporting documentation, or other design characteristics that will require additional review time beyond the pre-baseline schedule to reach a safety finding. A schedule will be transmitted to the applicant that is adjusted to account for the complexity or uniqueness of the review.

C. Baseline Schedule Adjustment Undetermined-In certain cases the application could be considered acceptable for docketing such that staff can begin the detailed technical review; however, it may lack certain information which would prevent the staff from being able to develop a plant specific review schedule. In such case the application can be docketed, but the staff would not issue an associated review schedule. Following receipt of an acceptable modified application or supplemental information, the staff would then establish the plant specific review schedule.

3.5   **Response to Applicant**

During the 60-day acceptance review, the Lead PM, supported by the appropriate staff and branch chiefs, should communicate the status of the staff's review with the applicant in accordance with applicable NRC procedures.

3.6   **Performance Measures**

Completion of the acceptance review is consistent with the EPM schedule.

4.   **REFERENCES**

A.   Regulatory Guide 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)."
B.   NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants."
C.   NUREG-1555, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants."
D.   Title 10, Part 52, of the *Code of Federal Regulations* (10 CFR Part 52), "Licenses, Certifications, and Approvals for Nuclear Power Plants."
E.   Staff Requirements Memorandum - COMDEK-07-0001/COMJSM-07-0001 - Report of the Combined License Review Task Force, dated June 22, 2007.
F.   SECY-05-0197, "Review of Operational Programs in a Combined License Application and Generic Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria."
G.   List of SAR Review Areas Potentially Involving More Detailed Review (ML072430683).
H.   Environmental Review Acceptance Checklist for Early Site Permit and Combined License Applications (ML072250354).

Attachments:

A.   Branch Memo Documenting Acceptance Review Results;
B.   Example Acceptance Review Schedule;
C.   Safety Analysis Report Acceptance Review Guide - For a Combined License Application (COLA) Referencing a Certified Design (ML073551169);
D.   Environmental Report Acceptance Review Guide - For a Combined License Application (COLA) (ML073551170);
E.   Safety Analysis Report Acceptance Review Guide - For a Combined License Application referencing a Design Certification that has not been certified (e.g., reviewed concurrently) (ML073551171);
F.   Safety Analysis Report Acceptance Review Guide - For a Combined License Application referencing a Design Certification that has not been certified (e.g., reviewed concurrently) and also referencing an NRC issued Early Site Permit (ESP) (ML073551173);
G.   Safety Analysis Report Acceptance Review Guide - For a subsequent Combined License Application (SCOL) referencing a Design Certification (ML073551175);

H. Safety Analysis Report Acceptance Review Guide - For a Design Certification Application (ML073551181); and
I. Design Certification Application Acceptance Review Checklist (ML073551182).

NRO-REG-100 - Change History			
Date	**Description of Changes**	**Method Used to Announce & Distribute**	**Training**
09/26/07	Initial issuance. The purpose of this OI is to provide guidance to NRO staff for performing combined operating license application acceptance reviews.	**Posting on NRO Webpage**	Email; division and branch presentations as requested

ATTACHMENT A

[DATE]

MEMORANDUM TO: [Branch Chief Name], Chief
                   [Name of PM Branch]
                   Division of New Reactor Licensing
                   Office of New Reactors [Include if originating organization is
                   outside NRO]

FROM: [Branch Chief Name], Chief
                   [Name of Technical Branch]
                   [Name of Division]
                   [Name of Office, if outside NRO]

SUBJECT: ACCEPTANCE REVIEW RESULTS FOR THE [plant/design XXXX]
                   [Application type: COMBINED LICENSE/DESIGN
                   CERTIFICATION] APPLICATION

[Name of branch (branch acronym)] has completed its acceptance review of the [plant/design
XXXX] [application type: Combined License application (COLA) or Design Certification
application] submitted by [Applicant XXX (applicant acronym)]. This review covered the following
FSAR Section[s] for which [branch acronym] has [primary/secondary] review responsibilities and,
in addition, applicable interface documentation referenced in the FSAR:

- FSAR Section X; Section Y; Section Z; and etc.
- Referenced documentation
  - [reactor designXXX] Design Control Document (DCD) Tier 1 / 2, Revision
    #[XX], Section[s] X, Y, and etc.
  - Technical / Topical Reports [identifyXXX (e.g., design vendor, NEI)

Completeness and Sufficiency

Based on our review, we have concluded that the application contains the information required
by applicable regulations and that the submitted information is technically sufficient for [branch
acronym] to commence the [plant XXXX COLA or design XXXX DCA] detailed technical review.
[***Alternate paragraph to be used when a FSAR section(s) is not technically sufficient***:
Based on our review, we have concluded that the application contains the information required
by applicable regulations. However, there are significant gaps in the submitted information that
preclude the conduct of an effective and efficient technical review and, therefore, preclude the
development of a specific review schedule at this time. [Branch acronym] cannot commence the
[plant XXXX COLA or design XXXX DCA] detailed technical review without the information
identified in Enclosure 1.]

The significant technical deficiencies are as follows ["No" responses to Column 4]
1.

Schedule

The estimated effort for the detailed technical review of the following [plant XXXX COLA or design XXXX DCA] FSAR Section[s] by [branch acronym] is [are] generally consistent with the current pre-baseline EPM model. The resource plan that currently exists in the EPM for these sections may be retained. The SRP sections in this category are:
[***Alternate paragraph to be used when a FSAR section(s) requires changes to the schedule:***
The estimated effort for the detailed technical review of the following [plant XXXX COLA or design XXXX DCA] FSAR Section[s] by [branch acronym] varies materially from the pre-baseline model in the EPM.   [provide rationale for differences] For each section, I have provided an updated resource plan for these tasks in Enclosure 2. The resource plan includes the new estimated level of effort, the resource(s) assigned, and the expected start date (or predecessor task that controls the start date e.g., application accepted milestone).   Revisions to the resource plans have been submitted for the following FSAR Section reviews:

- FSAR Section X1;
- FSAR Section X2;
- FSAR Section X3.

Review Dependencies.

[Branch acronym]'s detailed technical review of the [plant XXXX COLA or design XXXX DCA] is dependent upon completion of the staff's ongoing review as identified in Enclosure 2.

[Alternate paragraph: [Branch acronym]'s detailed technical review of the [plant XXXX COLA or design XXXX DCA] is independent of other ongoing application reviews by the staff.]

Enclosure: 1. Description of Significant Technical Deficiencies, if applicable (Staff may use Table 2 of the applicable Safety Analysis Report or Environmental Report Review Guide – Attachment C, D, or G to this OI)
2. Table 2 [Branch Name] Resource Plan Revisions for [Applicant Name] [Design Center Name] [Application Type], as necessary to document changes to planning assumptions (Staff must use Table 2 of the applicable Safety Analysis Report or Environmental Report Review Guide – Attachment C, D, or G to this OI)

CONTACT: [Branch Chief Name], [branch acronym]
[BC phone number]

DISTRIBUTION:
NRO/DE RF   [Lead PM]   [Supporting PM]   [NPLS PM]   [Other Technical Branches that have primary/secondary review]
ADAMS Accession No.:

OFFICE			
NAME			
DATE			

OFFICIAL RECORD COPY

ATTACHMENT B

Example Acceptance Review Schedule

Task Name	Duration*	Start	Finish
ACCEPTANCE REVIEW - RCOL, NRG ENERGY, SOUTH TEXAS PROJECT	43 days	10/01/2007	12/03/2007
Receiving, Staging and Noticing Application	1 day	10/01/2007	10/01/2007
SUNSI Review	5 days	10/02/2007	10/09/2007
Administrative Processing	6 days	10/01/2007	10/10/2007
Application Review by Technical Staff and PMs in NRO and NSIR	26 days	10/01/2007	11/06/2007
Compilation, Analysis, and Decision	25 days	10/23/2007	11/28/2007
Acceptance Review Complete	0 days	11/28/2007	11/28/2007
Federal Register Notice Published		11/28/2007	12/03/2007

 * Duration is in working days.

For the following Attachments see the identified ADAMS Accession No.

C. Safety Analysis Report Acceptance Review Guide - For a Combined License Application (COLA) Referencing a Certified Design (ML073551169);
D. Environmental Report Acceptance Review Guide - For a Combined License Application (COLA) (ML073551170);
E. Safety Analysis Report Acceptance Review Guide - For a Combined License Application referencing a Design Certification that has not been certified (e.g., reviewed concurrently) (ML073551171);
F. Safety Analysis Report Acceptance Review Guide - For a Combined License Application referencing a Design Certification that has not been certified (e.g., reviewed concurrently) and also referencing an NRC issued Early Site Permit (ESP) (ML073551173);
G. Safety Analysis Report Acceptance Review Guide - For a subsequent Combined License Application (SCOL) referencing a Design Certification (ML073551175);
H. Safety Analysis Report Acceptance Review Guide - For a Design Certification Application (ML073551181); and
I. Design Certification Application Acceptance Review Checklist (ML073551182).