



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

**OKLO, INC. – PRODUCT-BASED OPERATOR LICENSING FRAMEWORK TOPICAL  
REPORT AUDIT PLAN  
(EPID NO. L-2025-TOP-0008)**

**Applicant:** Oklo, Inc.

**Applicant Address:** 3190 Coronado Dr.  
Santa Clara, CA 95054

**Project No.:** 99902095

**Background:**

Oklo, Inc. (Oklo) began pre-application discussions with the U.S. Nuclear Regulatory Commission (NRC) staff on its proposed sodium-cooled fast reactor in 2021. Since then, Oklo has submitted several white papers and plans to submit at least one custom combined operating license (COL) application (COLA) in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants." in 2025. By letter dated March 11, 2025, Oklo submitted a topical report (TR) titled "Product-Based Operator Licensing Framework" (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML25070A325) for NRC staff review. This TR provided information relating to Oklo's proposed framework for enabling licensed operators to perform their assigned roles at, or in support of, any comparable Aurora powerhouse regardless of its geographical location.

**Purpose:**

The purpose of this audit is for the NRC staff to gain a better understanding of the product-based operator licensing TR by reviewing and discussing the material used to support statements or conclusions in the TR. The audit is expected to facilitate a more effective and efficient review by allowing the NRC staff to review and discuss supporting material with the objective of improving communication and eliminating unnecessary requests for additional information. The NRC staff plans to audit supporting documentation as needed to verify information and conclusions in the TR. If the NRC staff identifies information that is needed to support a finding, Oklo will need to submit that information on the pre-application docket.

**Regulatory Audit Basis:**

The basis for the audit includes the regulatory requirements in paragraphs (a)(14) and (a)(34) of 10 CFR 52.79, "Contents of applications; technical information in the final safety analysis report." This requires that each application for a COL contain a final safety analysis report (FSAR) that includes descriptions and plans for the operator training and qualification programs required in accordance with 10 CFR Part 55, "Operators' licenses."

### **Regulatory Audit Scope:**

The audit team will review documentation that provides supporting information for Oklo's product-based operator licensing TR. The audit scope consists of all chapters and appendices of the TR.

### **Information and Other Material Necessary for the Regulatory Audit:**

Audit information needs and questions are included in the appendix to this audit plan. Additional questions may be asked during the review.

### **Team Assignments:**

Theresa Buchanan, Senior Reactor Engineer  
 Maurin Sheetz, Reactor Engineer  
 Camille Peres, Reactor Operations Engineer  
 Donna Williams, Senior Project Manager  
 Katie Wagner, Project Manager  
 Jacqueline Tulip, Project Manager

Additional audit team members may be added as needed.

### **Logistics:**

Entrance Meeting: July 11, 2025, estimated and subject to change  
 Exit Meeting: October 1, 2025, estimated and subject to change

The NRC staff requests that all the documents in the audit scope be provided by Oklo on an online reference portal. An online reference portal, established by Oklo, would allow the NRC staff access to the technical information. Use of the online reference portal is acceptable provided that Oklo establishes measures to limit access to specific NRC staff (e.g., based on NRC e-mail addresses or the use of passwords which will only be assigned to the NRC staff directly involved in the audit on a need-to-know basis) and to make the documents view-only (i.e., prevent NRC staff from saving, copying, downloading, or printing any documents). The conditions associated with the online reference portal must be maintained throughout the audit process. The NRC staff who should initially be granted access to the portal are listed in the "Team Assignments" section. The NRC project managers for the audit will provide Oklo with the names of additional NRC staff who should be granted access.

The NRC staff requests that Oklo make their technical staff and subject matter experts available to answer questions during the audit.

The audit will follow the guidance in the Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, "Regulatory Audits" (ML19226A274). Audit meetings will take place primarily in a virtual format, using Microsoft Teams. Audit meetings will be scheduled on an as-needed basis after the entrance meeting and once the NRC staff has reviewed the documents placed in the online reference portal. If a site visit is needed, review topics will be provided to Oklo and mutually agreeable dates will be established.

**Special Requests:**

None.

**Deliverables:**

At the completion of the audit, the audit team will issue an audit summary within 90 days after the exit meeting but will strive for an earlier issuance. The audit summary will be declared and entered as an official agency record and be made publicly available for viewing through ADAMS.

**References:**

- Title 10 of the *Code of Federal Regulations*
- NRR Office Instruction LIC-111, "Regulatory Audits"

If you have questions about this audit, please contact me at 301-415-1322 or by email at Donna.Williams@nrc.gov.

*Donna Williams*

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Donna Williams, Sr. Project Manager  
Advanced Reactor Licensing Branch 1  
Division of Advanced Reactors and Non-Power  
Production and Utilization Facilities  
Office of Nuclear Reactor Regulation

SUBJECT: OKLO, INC. – PRODUCT-BASED OPERATOR LICENSING  
 FRAMEWORK TOPICAL REPORT AUDIT PLAN (EPID NO. L-2025-TOP-  
 0008) DATED: JULY 10, 2025

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**ADAMS Accession No.:**

**Package: ML25176A099**

**Audit Plan: ML25176A098**

**Enclosure: ML25176A097**

<b>OFFICE</b>	NRR/DANU/UAL1:PM	NRR/DANU/UAL1:LA	NRR/DRO/IOLB:BC	NRR/DANU/UAL1:BC
<b>NAME</b>	DWilliams	DGreene	JAnderson	JBorromeo
<b>DATE</b>	6/25/25	6/30/2025	7/8/25	7/10/25

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