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July 28, 2025
XO1-25-011

ATTN: Document Control Desk
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Energy Northwest New Nuclear Regulatory Engagement Plan, Revision 2

This letter transmits Revision 2 of the Regulatory Engagement Plan (REP) for the Energy Northwest New Nuclear, LLC (ENNN) Small Modular Reactor (SMR) project. The REP contains business sensitive information related to proposed scheduled activities. ENNN requests that portions of the REP be withheld from public disclosure in accordance with 10 CFR 2.390, "Public inspections, exemptions, request for withholding," paragraph (a)(4).

An affidavit providing the basis for this request is provided in Enclosure 1. Enclosure 2 is the non-public version of the REP which contains non-redacted business sensitive information. Enclosure 3 is the public (redacted) version of the REP.

This letter contains no commitments. If you have any questions or need any additional information, please contact Nathan Clark at ndclark@energy-northwest.com or (509)-377-6069.

Sincerely,

Signed by:
Lisa Williams
D582EC1FE95E4D8...
Lisa Williams
Operations, Licensing, Environmental Manager, New Nuclear Development

Enclosures:
1) Affidavit Supporting Request for Withholding from Public Disclosure
2) ENNN Regulatory Engagement Plan, Rev 2 (Proprietary)
3) ENNN Regulatory Engagement Plan, Rev 2 (Non-Proprietary)

cc:
Greg Cullen
Ken Langdon
Eric Andrews
Ms. Denise McGovern, NRR/DANU/UAL2
Ms. Madelyn Nagel, NMSS/REFS/EPMB3

Enclosure 1
Affidavit Supporting Request for Withholding from Public Disclosure

I, Lisa Williams, Manager, Operations, Licensing, and Environmental for Energy Northwest (EN) do hereby affirm and state:

1. I have knowledge of the criteria used by ENNN in designating information as proprietary and am authorized to execute this affidavit on behalf of ENNN. I am further authorized to review information submitted to or discussed with the U.S. Nuclear Regulatory Commission (NRC) and apply for the withholding of information from disclosure.

2. The purpose of this affidavit is to provide the information required by 10 CFR 2.390(b)(1) in support of ENNN and the project's request for proprietary treatment of certain commercial information submitted in Enclosure 2 to this letter which is requested to be withheld under the provisions of 10 CFR 2.390(a)(4).

3. Pursuant to the provisions set forth in 10 CFR § 2.390(b)(4), the following is provided for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.

    a. The information sought to be withheld in Enclosure 2 has been held in confidence by ENNN as confidential financial and commercial information.

    b. The information is of a type that is customarily held in confidence by ENNN based on the rationale described in this affidavit.

    c. The information is being transmitted to and, pursuant to 10 CFR 2.390, received by the NRC in confidence.

    d. No public disclosure of the information has been made, and it is not available in public sources. All disclosures to third parties, including any required transmittals to NRC, have been made, or must be made, pursuant to regulatory provisions or contractual agreements that provide for maintenance of the information in confidence.

    e. The information requested to be withheld contains information about the planned activities of ENNN related to development of the project, project development time frames, and relates the commercial strategy for the project. Release of the information requested to be withheld would reveal valuable information regarding development, competitive expectations, assumptions, current position and strategy. Its use by a competitor could substantially improve the competitor's position in licensing and construction of a similar project and harm continued financial support for this project.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on this 28 day of July 2025.

Signed by:
Lisa Williams
D582E61FE95E4D8...
Lisa Williams
Operations, Licensing, and Environmental Manager, Energy Northwest

Enclosure 2

Energy Northwest New Nuclear Regulatory Engagement Plan, Rev 2 (Proprietary)

Enclosure 3

Energy Northwest New Nuclear Regulatory Engagement Plan, Rev 2 (Non-Proprietary)

Energy Northwest
New Nuclear LLC
345 Hills Street
Richland, WA 99352

Small Modular Reactor Project

Regulatory Engagement Plan

(Revision 2)

July 2025

1.0 INTRODUCTION

1.1 Purpose and Objective

Energy Northwest New Nuclear, LLC (ENNN) is a wholly owned subsidiary of Energy Northwest (EN). ENNN intends to construct and operate up to 12 Xe-100 small modular reactor (SMR) modules on the Department of Energy's (DOE) Hanford Site adjacent to Columbia Generating Station in Benton County, Washington, for the purpose of addressing electrical demand in the Pacific Northwest and providing economical electrical power to subscribers of the project. This endeavor will be referred to as the "ENNN SMR Project" or "the Project".

This Regulatory Engagement Plan (REP) identifies the licensing approach and regulatory engagements, including face-to-face and remote meetings, audits, and submittal of topical reports and white papers that ENNN foresees in the implementation of its licensing strategy. Engagements will be with federal, state, and local agencies, including the US Nuclear Regulatory Commission (NRC), the DOE Hanford Field Office (DOE-HFO), the DOE Loan Program Office (DOE-LPO), and the Washington State Energy Facility Site Evaluation Council (EFSEC). This REP also provides a brief overview of ENNN SMR Project, the project structure, and the Xe-100 SMR technology.

The objectives of this REP are to:

- Facilitate and enhance ENNN communication with and between the NRC, DOE-HFO, DOE-LPO, and EFSEC
- Reduce regulatory uncertainty
- Promote project stability and predictability
- Minimize regulatory review timelines to obtain necessary agreements, permits, and licenses

These objectives are accomplished through early and frequent interactions with NRC staff and other agencies and through submittals that:

- Enhance the regulator's understanding of the ENNN SMR Project,
- Permit early identification and resolution of licensing/permitting issues, and
- Enable the regulator to appropriately plan resources to support the project schedule.

ENNN, as the applicant, is responsible for all interactions with regulators such as the NRC, DOE-HFO, DOE-LPO, EFSEC, and other federal, state, and local regulatory and permitting agencies relative to project activities.

X-energy, as the designer of the Xe-100, is currently engaged with the NRC in pre-application activities related to the Xe-100 design, analysis, and licensing basis under NRC Docket 99902071. As such, the engagements relative to the generic design, analysis, and licensing basis of the underlying advanced reactor technology are contained in X-energy's REP.

Specifically, the following topics are covered in X-energy's REP:

- Xe-100 Principal Design Criteria Licensing
- Risk-Informed Performance-Based Licensing Basis: X-energy's Approach to NEI 18-04 Implementation

- TRISO-X Pebble Fuel Qualification Methodology
- Xe-100 Mechanistic Source Term Methodology
- Transient and Safety Analysis Methodology
- Probabilistic Risk Assessment Technical Adequacy

The ENNN REP is not intended to duplicate that effort. This REP identifies those engagements specific to the ENNN SMR Project including plant configuration and site-specific activities. ENNN intends to update this REP at least annually to reflect changes in planned engagements. The REP should be used by NRC and other agencies to identify expected timeframes for regulatory submittals and planned interactions preceding the submittals.

This REP was developed with consideration of the Nuclear Energy Institute (NEI) draft "Industry Guideline for Development of a Regulatory Engagement Plan" and Appendix A to the NRC's DANU-ISG-2022-01, "Interim Staff Guidance, Review of Risk-Informed, Technology-Inclusive Advanced Reactor Applications – Roadmap," March 2024.

1.2 Project Contact Information

To facilitate communication between ENNN and the NRC, the following key contact information is applicable for ENNN in support of licensing activities:

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509-377-8148

1.3 Selected Reactor Technology

The ENNN SMR Project has selected the Xe-100 high-temperature gas-cooled reactor (HTGR) SMR technology supplied by X-Energy, LLC, (X-energy) of Rockville, MD. The Xe-100 HTGR is a pebble-bed reactor using X-energy's TRISO-X fuel, which is designed to contain fission products within the fuel under operating and accident conditions thereby contributing to an inherently safe reactor design. The steady-state design of the Xe-100 utilizes high assay low enriched uranium (HALEU) TRISO-X fuel with online refueling. The Xe-100 design utilizes the physical properties of reactor neutronics, heat transfer, fluid flow, and gravity to keep the reactor intrinsically safe under all licensing basis events without requiring electrically powered active safety systems. Regulatory dose limit targets ensuring adequate protection of public health and safety and protection of the environment will be met at an Exclusion Area Boundary (EAB) that is anticipated to be located within the site boundary.

ENNN intends to construct between four and twelve Xe-100 modules on the site over time as power demand increases. Four modules are contained in one reactor building and comprise one unit. Each module is rated at 200 MWt (~80 MWe). The modular approach enables ENNN to incrementally increase project capacity in tandem with electrical load growth.

1.4 Proposed Site Location

The proposed project site is located about 10 miles north of the City of Richland, Washington, in Benton County, and approximately two miles west of the Columbia River. The site is within the boundary of the DOE's Hanford Reservation, an area consisting of 586 square miles established by the federal government in 1943 to produce nuclear materials for national defense purposes. The project site has been leased by EN from DOE-HFO since 1975 for the purposes of energy production. The current lease expires June 30, 2032, with options to extend to January 1, 2052.

The proposed site is adjacent to and east of the Columbia Generating Station (NRC Docket 05000397), a boiling water reactor in operation since 1984 that is currently licensed to operate until 2043. The proposed site houses two legacy nuclear facilities: WNP-1 (NRC Construction Permit CPPR-134), a 1250 MWe pressurized water reactor that was under construction but halted in the 1980s and later cancelled, and WNP-4 (NRC Construction Permit CPPR-174), a twin to WNP-1 that was also canceled while under construction in the 1980s. Restoration work on the site is currently nearing completion, and the site is available for future development. As such, the site has been subjected to a number of historical environmental and site characterization activities that document the suitability of the site for the construction and operation of nuclear power plants in the vicinity of the proposed ENNN SMR Project.

1.5 Strategic Licensing Approach

The ENNN SMR Project will use the two-step 10 CFR Part 50 licensing process, beginning with a construction permit application (CPA) followed by an operating license application (OLA). This approach allows ENNN to begin construction while detailed design and licensing activities continue in parallel for the expected second-of-a-kind Xe-100 SMR project. This licensing approach will provide maximum flexibility to adjust for design improvements and emergent changes during the design and construction periods relative to the alternative one-step 10 CFR Part 52 licensing process.

The first deployment of the Xe-100 technology is expected to occur under the DOE's Advanced Reactor Demonstration Program (ARDP) in which Dow Chemical subsidiary Long Mott Energy, LLC (LME) plans to deploy four Xe-100 SMRs at its site in Seadrift, TX under the name of the Long Mott Generating Station. The ENNN SMR Project is planning to be a close follower to LME's project to utilize, to the extent practical, licensing precedents and lessons learned from licensing, procurement, construction, and commissioning.

Environmental reviews and permits will be coordinated between the NRC, DOE-HFO, DOE-LPO, and EFSEC. It is expected that the NRC will be the lead agency for the environmental reviews and that DOE-HFO and EFSEC will act as cooperating agencies. EFSEC is responsible for siting nuclear energy facilities in Washington State and issuing a Site Certification Agreement (SCA) to authorize construction and operation of the ENNN SMR Project in WA State thereby demonstrating compliance with the WA State Environmental Policy Act (SEPA). DOE-HFO leases the site to ENNN and will need to revise the lease to allow the construction and operation of the ENNN SMR Project. ENNN is applying for a loan from the DOE-LPO for the construction of the ENNN SMR Project. Note: the DOE-LPO approved Part I of EN's loan application, which allows ENNN to continue in the loan process with preparation and submittal of the Part II loan application. Since the project is on federal property and will use federal funds, it is a federal action and DOE-HFO and DOE-LPO are required to satisfy their obligations under the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA).

Energy Northwest expects the ENNN SMR Project will involve novel or unique licensing approaches. These approaches will be specifically addressed in engagements with the NRC as identified in Section 3.

1.6 Deployment Overview

Deployment of the ENNN SMR Project will proceed along several parallel lines of development as described briefly below.

1. Preapplication Phase

    - Begin pre-application engagement with the NRC, DOE-HFO, DOE-LPO, and EFSEC.
    - Engage affected communities, stakeholders, and tribes.
    - Submit white papers and License Topical Reports (LTRs) in key topical areas.
    - Develop Quality Assurance Program Description (QAPD) and implementing procedures.
    - Conduct necessary site characterization activities.
    - Complete necessary design and analysis of the Xe-100 SMR.
    - Prepare Part II of the DOE loan application and submit to DOE-LPO.
    - Participate in preapplication readiness assessments from NRC and EFSEC.
    - Prepare Environmental Report (ER) and submit to NRC, DOE, and EFSEC.
    - Engage with DOE-HFO on lease amendment authorizing construction and operation.
    - Prepare Preliminary Safety Analysis Report (PSAR).
    - Submit CPA to NRC.

2. CPA Review Phase

    - Respond to NRC requests for information.
    - Continue engagement with affected communities, stakeholders, and tribes.
    - Continue submittal of white papers and LTRs in key topical areas.

- Develop Quality Assurance (QA) implementing procedures for construction activities.
- Finalize the design and analysis of the Xe-100 SMR.
- Begin operator training and development of site operating organization.
- Obtain Final EIS from NRC.
- Obtain revised lease agreement from DOE-HFO.
- Obtain SCA from EFSEC.
- Obtain NRC construction permit (CP).
- Begin non-nuclear site preparation and construction allowed by revised lease and SCA.
- Conduct remaining site characterization activities to support OLA submittal.
- Begin preparation of Final Safety Analysis Report (FSAR) and ER Revision for OLA.

3. Construction/OLA Prep and Review Phase

- Participate in preapplication readiness assessments from NRC.
- Submit OLA.
- Prepare license applications for material licenses under 10 CFR 30 (byproduct material), 10 CFR 40 (source material), and 10 CFR 70 (special nuclear material).
- Respond to NRC requests for information.
- Process necessary changes to the design and periodically update the OLA FSAR.
- Participate in NRC audits of construction activities.
- Complete ENNN SMR Project construction

4. Startup and Commissioning Phase

- Perform system lineup, preoperational, and initial startup test program.
- Receive fuel onsite once the Operating License (OL) is approved.
- Complete commissioning activities, including power testing.

The proposed schedule is provided in Table 1 below.

Table 1: Projected Milestone Dates

Milestone	Estimated Date
Begin regulatory engagement	Jan 2024 (completed)
Submit Construction Permit Application Part 1 supporting early environmental review	[[ ]]^{p}
Submit Construction Permit Application Part 2	[[ ]]^{p}
Receive Construction Permit	[[ ]]^{p}
Submit Operating License Application	[[ ]]^{p}
Complete Construction, Receive Operating License	[[ ]]^{p}
Commercial Operation (1st module)	[[ ]]^{p}

1.7 Construction Permit Application

The requirements in 10 CFR 2.101 govern the requirements for filing of an application. DANU-ISG-2022-01, Appendix C, contains guidance on the required contents of the CPA that will be implemented for the ENNN SMR Project CPA:

- ER
- PSAR – Chapters 1-12
- Program/additional information including:
  - QAPD
  - Information Security Plan
  - Emergency Planning analysis
  - Aircraft Impact Assessment
  - Fitness for Duty Program
  - Applicable Research and Development Programs
  - Fuel Qualification
  - Regulatory Exemptions
- General information including:
  - Applicant information
  - Financial qualification information
  - Project schedule information
  - Project interface information
  - Filing fee

1.8 Environmental Report

The ER will be written to support the following regulatory agency requirements:

- NRC obligations under the National Environmental Policy Act (NEPA) as described in 10 CFR 51
- DOE-HFO and DOE-LPO needs as described in 10 CFR 1021
- EFSEC needs as described in chapter 43.21C RCW (Revised Code of Washington)

The ER will follow the guidance below:

- Regulatory Guide (RG) 4.2, “Preparation of Environmental Reports for Nuclear Power Plants,” which describes an acceptable method to satisfy ER requirements.
- RG 4.7, “General Site Suitability Criteria for Nuclear Power Stations,” which describes an acceptable method to implement site suitability requirements and provides guidelines for determining the suitability of a candidate site for nuclear power stations.
- NUREG-1555, “Standard Review Plans for Environmental Reviews for Nuclear Power Plants,” which contains guidance for NRC staff review of an ER.

It is anticipated that NRC will act as the lead agency in reviewing the ER and developing an EIS with DOE-HFO as a cooperating agency. EFSEC’s review of the ENNN SMR Project’s application will proceed in parallel with the NRC’s review of the ER. ENNN will facilitate discussions between the NRC and EFSEC to develop a memorandum of understanding (MOU) and division of responsibility (DOR) for the environmental reviews to minimize duplication of effort. A crosswalk between ER content as directed by NUREG-1555 and content required by Washington Administrative Code (WAC) 463-60 will be provided with the ER. Information that is required by EFSEC but not by the NRC may be provided in an appendix to the ER. EFSEC may issue a state supplement to the NRC EIS to cover state-specific topics.

ENNN plans to report results of recent studies and on-going groundwater monitoring in the vicinity of the site in the ER. If needed, ENNN will install additional wells on the site and provide groundwater monitoring results after submittal of the CPA. The site environment and groundwater have been extensively monitored for decades, and new studies are expected to confirm past results.

In order to facilitate federal and state authorization to proceed with non-nuclear construction and to release federal funding for such activities, ENNN wishes to obtain the final EIS as early as possible. As such, ENNN will explore regulatory options for submitting the ER portion of the CPA in advance of the information required by 10 CFR 50.34(a). ENNN expects that the balance of the CPA submittal would occur within 6-18 months of the initial submittal. ENNN may submit an exemption request to the requirements of 10 CFR 2.101(a)(5) to authorize the ER portion of the CPA be submitted in advance of the information required by 10 CFR 50.34(a) and allow greater than six months between the two parts of the submittal.

1.9 Preliminary Safety Analysis Report

The development of the PSAR will be based on two activities: the advanced reactor content of application project (ARCAP), and the technology-inclusive content of application project (TICAP) as described below from DANU-ISG-2022-01.

- ARCAP, which is broad and encompasses several industry-led and NRC-led guidance development efforts, will be used to provide guidance for the complete non-LWR application.

- TICAP will be used to provide guidance for the appropriate scope and depth of information related to the specific portions of the safety analysis report (SAR) that describe the fundamental safety functions of the design and details the safety information pertinent to a facility using the Licensing Modernization Program (LMP) approach. The ENNN SMR Project will implement the LMP approach as described in NEI 18-04, "Risk-Informed Performance-Based Technology Inclusive Guidance for Non-Light Water Reactor Licensing Basis Development," Revision 1, which is endorsed by NRC RG 1.233, "Guidance For A Technology-Inclusive, Risk-Informed, and Performance-Based Methodology to Inform The Licensing Basis and Content of Applications for Licenses, Certifications, and Approvals for Non-Light-Water Reactors," Revision 0.

Because of the limited scope of the TICAP guidance, it is encompassed by and supplemented by the ARCAP guidance, which will cover the areas of the SAR that are outside the scope of the LMP process and TICAP. Figure 1 below illustrates the relationship between guidance produced under ARCAP and TICAP and other guidance for the review of non-LWR applications. The ARCAP guidance is contained in NRC's Interim Staff Guidance (ISG) DANU-ISG-2022-01, "Review of Risk-Informed, Technology-Inclusive Advanced Reactor Applications – Roadmap," March 2024, and a series of ARCAP ISGs.

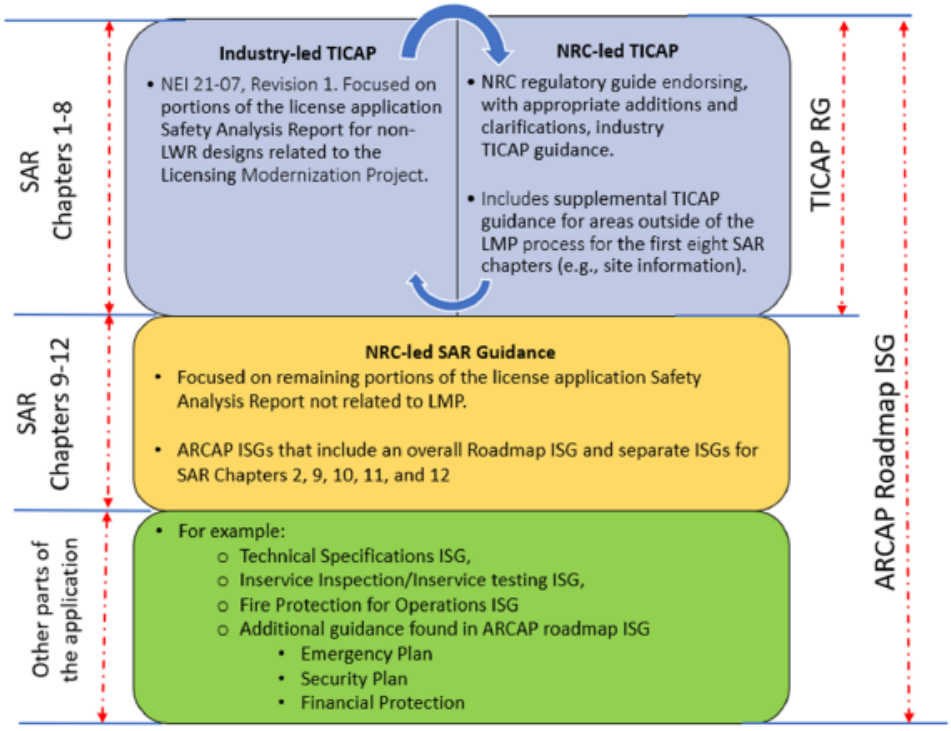

Figure 1: Relationship between ARCAP, TICAP, and the Content of an Application

The PSAR is planned for submittal following submittal of the ER. As discussed above, ENNN is exploring the timing of the PSAR submittal relative to the ER.

ENNN plans to utilize, to the extent practicable, the results of recent geotechnical studies in the vicinity of the site in the PSAR. This will include the ground motion response spectrum (GMRS), which will be based on known characteristics of the site, as supplemented by additional testing and analysis deemed necessary. A site-specific GMRS based on new geotechnical studies will be included with the OLA. The GMRS presented in the PSAR and used for plant design is expected to bound the site-specific GMRS. Since the site has been extensively studied over many decades and lithology is relatively uniform, new studies are expected to confirm the previous results.

Similarly, the results from post-Fukushima flooding hazard reevaluations for Columbia Generating Station will be used for preliminary evaluations for the ENNN SMR Project PSAR.

1.10 Operating License Application

The OLA consists primarily of the Final Safety Analysis Report (FSAR), a supplement to the ER as needed to address new and significant information, and other program documents required by the Code of Federal Regulations. The FSAR follows the same guidance identified for the PSAR above plus the requirements of 10 CFR 50.34(b). The FSAR will provide sufficient information for the NRC to draw a conclusion of reasonable assurance that the health and safety of the public will be protected. The submitted FSAR will be amended periodically during the construction phase in response to design changes and NRC staff reviews. ENNN expects that each Xe-100 unit will have its own Class 103 license issued through review of a common application. Shared SSC license conditions are expected for each unit. Additional information on the contents of the OLA will be provided in subsequent updates to this REP.

2.0 DOE-HFO AND EFSEC SITE APPROVAL

Beyond NRC licensing approval processes, additional approvals are required to support project construction and operation: DOE-HFO Written Approval and EFSEC Site Certification Agreement, both of which are subject to environmental review. Regulatory engagement with these two organizations is being conducted in parallel with the NRC engagement activities to facilitate coordinated environmental review support between the agencies.

2.1 DOE-HFO Written Approval

The proposed project site, which is located on the DOE Hanford Site, is currently being leased by EN from the DOE-HFO. ENNN subleases a portion of the site from EN. The current lease agreement authorizes site remediation efforts and will expire in 2032 with the option to extend until 2052. Written authorization including a lease amendment is required to authorize project construction and to support an operational licensed life beyond 2052.

2.2 EFSEC Site Certification Agreement

Nuclear power facility siting in the state of Washington falls under the purview of the EFSEC. Their function, roles, and requirements are described in RCW Chapter 80.50 and the Washington Administrative Code (WAC) Title 463. State permission for nuclear power facility construction and operation is granted through the issuance of a Site Certification Agreement as outlined in WAC 463-060.

3.0 ENGAGEMENT PLAN

3.1 Preapplication Engagement

Pursuant to the objectives outlined above, ENNN plans extensive pre-application engagement with the NRC, DOE-HFO, and EFSEC. The following table presents the planned interactions with the NRC staff. As noted previously, engagements relative to the generic design, analysis, and licensing basis of the Xe-100 reactor technology are contained in X-energy's REP and are not repeated here.

3.2 Routine Engagement

Beginning in the third quarter of 2024, EN engaged in interactive meetings with NRC staff on licensing topics relevant to the ENNN SMR Project. Routine interactions with the staff on project updates will be established to support timely communication and coordination of project related licensing activities.

3.3 Specific Preapplication Engagement Topics

ENNN has identified specific preapplication engagement topics to help reduce future licensing activity uncertainty through targeted technical and policy topical area reviews. These topics will be introduced to NRC and other stakeholders using one or more of the following methods:

- Licensing Topical Reports
- White Papers
- Closed and Open Meetings

A listing of preapplication submittals and meetings is provided in the following tables.

Table 2: Prospective Licensing Topical Reports

Engagement	Tentative Dates	Objectives
Quality Assurance Program Description (LTR)	Submitted Dec 2024	Obtain NRC approval of the overall quality assurance (QA) program for the ENNN SMR Project and enable ENNN to implement the QA procedures early in the project to reduce regulatory uncertainty.
Control Room Staffing Analysis Approach (LTR)	Meeting: [[ ]]^{p} Submittal: [[ ]]^{p}	Present methodology used to justify control room staffing for operation of up to 12 units. Will require revision to X-energy LTR.

Table 3: Prospective White Papers

Engagement	Tentative Dates	Objectives
Regulatory Interaction and Support	Submitted Jun 2025	Provide ENNN needs from all three oversight organizations (NRC, DOE, EFSEC) to promote efficiencies
Use of Historical Information	Submitted Jul 2025	Discuss basis for EN's use of historical information to lay groundwork for flooding, seismic, and groundwater whitepapers/discussions.
Use of existing geotechnical data for characterization of site flooding hazards for CPA	Submittal: [[ ]]^{p} Meeting: [[ ]]^{p}	Discuss use of historical data and hazard evaluations to demonstrate regulatory objectives are met for the CPA.
Xe-100 Licensing Application Content and Regulatory Analysis	Submittal: [[ ]]^{p} Meeting: [[ ]]^{p}	Review planned content of CPA to identify the applicability of regulation
Use of existing data for groundwater monitoring	Submittal: [[ ]]^{p} Meeting: [[ ]]^{p}	Discuss available data and on-going monitoring programs to demonstrate regulatory objectives are met.
Use of existing geotechnical data for characterization of site seismic hazards for CPA	Submittal: [[ ]]^{p} Meeting: [[ ]]^{p}	Discuss available data and recent hazard evaluations to demonstrate regulatory objectives are met for the CPA.
Volcanic Hazards Assessment	Submittal: [[ ]]^{p} Meeting: [[ ]]^{p}	Describe engineering analysis approach to reduce regulatory uncertainty.
Handling of Safeguards Information	[[ ]]^{p}	Facilitate early access to and exchange of safeguards and security information.
Exemption Request for two-part CPA submittal	Submittal: [[ ]]^{p} Meeting: [[ ]]^{p}	Request for exemption from certain 10 CFR 2.101(a)(5) requirements to allow two-part submittal of the CPA (ER followed by PSAR)

Table 4: Prospective Preapplication Engagement Topics

Engagement	Tentative Dates	Objectives
Approach to multi-unit licensing and phased construction	[[ ]]^{p}	Provide proposed approach to licensing application submittal, construction permit issuance, operating license issuance, and construction timeline.
Environmental cooperation between DOE, EFSEC, and NRC	[[ ]]^{p}	Discuss collaboration through the environmental decision, document development, review, and approval processes
Preapplication Readiness Assessment – ER	[[ ]]^{p}	Identify potential gaps early enough to correct them before submittal to facilitate NRC acceptance review.
Emergency planning zone analysis	[[ ]]^{p}	Obtain alignment on emergency planning analyses to facilitate program development.
Operator licensing and training program development	[[ ]]^{p}	Obtain early alignment of approach to operator licensing and qualification program.
Decommissioning planning and funding	[[ ]]^{p}	Describe plans for decommissioning and plans for developing decommissioning funding estimates.
Use of seismic isolators	[[ ]]^{p}	Discuss use and analysis of seismic isolators to reduce regulatory uncertainty
CPA content differences between ENNN and LME projects	[[ ]]^{p}	Identify planned differences in CPA content (gap analysis) between two projects.
Preapplication Readiness Assessment – PSAR	[[ ]]^{p}	Identify potential gaps early enough to correct them before submittal to facilitate NRC acceptance review.

Table 5: Planned Management Engagements

Engagement	Tentative Date	Objective
Licensing Activity Update	Drop-in: [[ ]]^{p}	See above.
Licensing Activity Update	Drop-in: [[ ]]^{p}	See above.
Environmental Updates	Monthly	Provide status updates on environmental report development and supporting siting activities to align expectations and identify and resolve potential issues.

3.4 Post-Application Engagement

To be included in future updates to the REP.

Certificate Of Completion

Envelope Id: F7684407-3E8C-4902-BCBB-5D56FD0FE009
Status: Completed
Subject: Complete with Docusign: XO1-25-011 REP Rev 2.doc
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Company Name: Energy Northwest

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Editor Delivery Events	Status	Timestamp

Agent Delivery Events	Status	Timestamp

Intermediary Delivery Events	Status	Timestamp

Certified Delivery Events	Status	Timestamp

Carbon Copy Events	Status	Timestamp

Witness Events	Signature	Timestamp

Notary Events	Signature	Timestamp

Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	7/28/2025 4:36:48 PM
Certified Delivered	Security Checked	7/28/2025 4:37:22 PM
Signing Complete	Security Checked	7/28/2025 4:43:53 PM
Completed	Security Checked	7/28/2025 4:43:53 PM

Payment Events	Status	Timestamps

Electronic Record and Signature Disclosure