



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

September 2, 2025

**OKLO, INC. – PRE-PHASE 2 COL SUBMITTAL AUDIT
PLAN (EPID NO. L-2022-LRM-0042)**

Applicant: Oklo, Inc.

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

Project No.: 99902095

Background:

By letter dated February 21, 2025 (ML25052A168), Oklo indicated its intention to submit a combined license (COL) application in two phases in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) section 2.101(a)(5) and pursue readiness assessments for each phase. The staff held a readiness assessment for phase 1 and issued a report on July 7, 2025 (ML25178A078). In advance of phase 2 submittal, Oklo prepared background information on several areas it plans to address in its COL application and for which it is proposing alternative graded approaches to meeting regulatory requirements for power reactors.

Purpose:

The purpose of this audit is for the NRC staff to gain a better understanding of Oklo's proposed licensing approaches through review of supporting documents and discussions with Oklo. The audit is expected to facilitate more effective and efficient exchange of information by allowing the NRC staff to review and discuss supporting material. The audit will also provide an opportunity for NRC staff to identify potential information gaps that will need to be addressed in future submittals.

Scope and Schedule

The audit will focus on the following topics:

- Safety analysis
- Pre-operational testing, in-service inspection and testing (ISI/IST), material surveillance
- Maintenance rule implementation
- Site characterization
- Quality assurance

Information on these topics will be made available to the NRC staff in support of this audit in an online reference portal.

Oklo has indicated that it will provide a presentation during the entrance meeting (planned for September 3, 2025) during which it will describe its overall strategy for using alternative approaches to regulations for power reactors. Several audit meetings are planned for September 3 and 4 to discuss the topics listed above. The end date of the audit will depend on the need for follow-up discussions.

Location

The audit will be conducted at NRC offices in Rockville, MD, and virtually using an online reference portal and Microsoft Teams.

Audit Team

The following table identifies the NRC staff assigned to each topic:

Application Review Area	NRC Reviewers*
Safety analysis	Alex Siwy, Tracy Radel, Hakan Ozaltun Michelle Hart, Pravin Sawant, NRR/DANU/UTB1 and 2, Ed Helvenston NRR/DANU/UNPL
Pre-operational testing, ISI/IST, material surveillance	Bruce Lin, Matthew Gordon, Ryann Bass, NRR/DANU/UTB1 and 2
Maintenance Rule implementation	John Hughey, NRR/DRA/APOB Hanh Phan, NRR/DANU/UTB2
Site Characterization	Anthony Torres, Hosung Ahn, Jenise Thompson, Kevin Quinlan, Sarah Tabatabai, NRR/DEX/EXHB; Amit Ghosh, Patrick Koch, Luisette Candelario- Quintana, NRR/DEX/ESEB; Tracy Radel, NRR/DANU/UTB2
Quality Assurance	Yiu Law, NRR/DRO/IQVB John Matrachisia, NRR/DANU/UTB3 Ryann Bass, NRR/DANU/UTB2

* Organizational abbreviations: NRR (Office of Nuclear Reactor Regulation), DANU (Division of Advanced Reactors and Non-power Production and Utilization Facilities), UTB (Advanced Reactor Technical Branch), DRA (Division of Risk Assessment), APOB (PRA [Probabilistic Risk Assessment] Oversight Branch), DEX (Division of Engineering and External Hazards), EXHB (External Hazards Branch), ESEB (Structural, Civil, and Geotechnical Engineering Branch), DRO (Division of Reactor Oversight), IQVB (Quality Assurance and Vendor Inspection Branch)

Audit team members may change, and additional audit team members may be added as needed.

Conduct of the Audit

The NRC staff requests that all documents in the audit scope be provided by Oklo on an online reference portal established by Oklo. Use of the online reference portal is acceptable provided that Oklo implements measures to limit access to specific NRC staff (e.g., based on NRC e-mail addresses or the use of passwords that 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 of this audit plan. 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 are scheduled for September 3 and 4, 2025; additional meetings will be scheduled on an as-needed basis after.

Communicating Audit Observations

The NRC staff will share any technical concerns or major information gaps with Oklo as soon as practicable. Additionally, within 45 calendar days after the completion of the audit, the NRC staff will issue a publicly available report that summarizes the NRC staff's observations and feedback.

If it is necessary to include proprietary information in the audit report, the NRC staff will issue proprietary and non-proprietary versions.

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

Donna Williams

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 PRE-PHASE 2 SUBMITTAL AUDIT PLAN (EPID NO. L-2022-LRM-0042) DATED: SEPTEMBER 2, 2025

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