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Mr. Theodore S. Sherr
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**Reference: Comments on the March 2000 Draft Version of NUREG-1520
'Standard Review Plan for the Review of a License Application
for a Fuel Cycle Facility': Introduction, Acronyms, Glossary,
Chapter 1 - General Information, Chapter 2 -- Organization
and Administration**

Dear Mr. Sherr:

The Nuclear Energy Institute (NEI)¹ and its industry members have reviewed the March 2000 revisions of draft Standard Review Plan (SRP) Chapter 1 ('General Information'), Chapter 2 ('Organization and Administration') and the Introduction-Acronyms-Glossary. We regret being unable to submit these comments prior to the April 18-19 NRC Public Meeting on the SRP, but we do hope they will be of assistance to the staff in revising this chapter of draft NUREG-1520. We have examined how the staff has addressed issues raised by NEI in its letters to you dated July 19-20, 1999 on the previous versions of these chapters (May 1999). We have also taken into consideration discussions that took place at the February 9-10, 2000 NRC Public Meeting ('*Comment Resolution on Part 70 Standard Review Plan*').

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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NEI appreciates the opportunity to have been able to review the March 2000 revisions to draft NUREG-1520 chapters. We are encouraged by the ongoing resolution of industry concerns and with other improvements that have been made to this guidance document.

Please feel free to contact me should you have any questions concerning the proposed improvements in the attachment to this letter.

Sincerely,

Felix M. Killar, Jr.
Director, Material Licensees and Nuclear Insurance

c. Mr. Marvin S. Fertel
Dr. William F. Kane, Director NMSS

REVIEW OF MARCH 2000 REVISION OF NUREG-1520
INTRODUCTION-ACRONYMS-GLOSSARY
CHAPTER 1: GENERAL INFORMATION
CHAPTER 2: ORGANIZATION AND ADMINISTRATION

General Comments:

Introduction-Acronyms-Glossary:

The Introduction reads well and requires few revisions. Directions to the license applicant to emphasize a '*systems-oriented approach*' [Section 1] and to the NRC reviewer to focus on the '*applicant's commitments*' [Sections 4 & 5] and to understand that acceptance criteria are based on '*regulatory requirements*' are commended.

Chapter 1: General Information: Chapter 1 provides clear reasonable guidance for the non-technical information required in this chapter.

Chapter 2: Organization and Administration: This chapter reads well and NEI sees no need for further improvements.

Outstanding Issues of Concern

- Introduction-Acronyms-Glossary:
 - (i) the list of acronyms is incomplete. Some acronyms in this list are no longer referenced in the SRP chapters. NEI has undertaken a cursory review of the eleven SRP chapters and has identified an additional 21 acronyms that should be added to this list. (We recommend a more thorough review to identify any remaining acronyms,).
 - (ii) introduction of the concept of 'prohibition' into the definitions of '*Augmented Administrative Controls*' and '*Simple Administrative Controls*' is strongly discouraged. An administrative control should *primarily* outline what activities an individual should take in the event of an accident rather than to specify what actions should not be taken. A list of prohibitions could go on forever. Recommend continued use of the definition proposed in the May 1999 version of the SRP.
 - (iii) the definition of '*accident sequence*' should be more narrowly defined as it would now encompass very minor occurrences such as an unintended occupational exposure well within the limits of 10 CFR 20. The definition should be modified to refer to an unintended sequence of events or process failures that would result in consequences equaling or exceeding the performance requirements of 10 CFR 70.61. Recommend redefinition of this term to read: "...*An unintended sequence of events or process*

failures that would result in consequences equaling or exceeding the performance requirements of 10 CFR 70.61. The term "accident" may be used interchangeably with "accident sequence"..."

- (iv) The Glossary has been simplified by deleting definitions of terms presented in 10 CFR 70.4 and 10 CFR 0.1003. There remain some terms in the Glossary that are no longer used in the eleven SRP chapters. These superfluous terms should be deleted.
- **Chapter 1: General Information**: The relocation of text from §1.2.4.3(3) to §1.1.4.3 has created a disconnect between the 'Areas of Review' and 'Acceptance Criteria' of this chapter. The continued reference to quantitative likelihoods in §1.3.4.3 should be corrected.
- **Chapter 2: Organization and Administration**: NEI has no outstanding concerns with this chapter.

Specific Concerns:

- **Introduction-Acronyms-Glossary**:
 - (i) 2nd and 3rd sentences, 7th paragraph: for clarity, simplify these sentences to read: "*...The Safety Program Description is the principal document used by staff to obtain reasonable assurance that the facility is designed and will be operated without undue risk to the health and safety of workers or the public...*".
 - (ii) 9th paragraph: reference is made to an SRP Appendix that provides guidance on filing standards for applications. This Appendix does not appear to be included in the March 2000 SRP revision. What is this Appendix?
 - (iii) Section 2 ('*Responsibility for Review*'): 3rd sentence: suggest definition of the SER acronym here as well as capitalization of this term (for consistency with the balance of the SRP). Revise sentence to read, in part: "*...total review product which is referred to as a Safety Evaluation Report (SER) for an application...*".
 - (iv) Section 5 ('*Review Procedures*'): the last sentence may need some revision for new license applicants, for it will generally not be possible to "*...evaluate the applicant's level of achievement of the acceptance criteria...*" until a plant operating history is developed.

- (v) The list of acronyms need to be updated as follows:

<i>Acronyms for Deletion:</i>	Citation
CAM: Continuous Air Monitor	
<i>Acronyms for Addition:</i>	
AEC: Active Engineered Control	Appendix A (C)
ANS: American Nuclear Society	§5.4.2
ASME: American Society of Mechanical Engineers	§11.7
CAAS: Criticality Accident Alarm System	§5.3.3
DFP: Decommissioning Funding Plan	§10.1
DP: Decommissioning Plan	§10.1
EAL: Emergency Action level	§8.4.3.2.4
FM: Factory Mutual Data Sheets & Approval Guide	§7.4.3
H&S: Health and Safety	§11.4.3.7
ISO: note that this term is incorrectly identified in §6.4.3.1(8)	
MDC: Minimum Detectable Concentration	§9.4.3.2.2(a)
NMSS: Nuclear Material Safety and Safeguards	§9.6.2.1
NCRP: National Council on Radiation Protection and Measurements	§4.4.6.2
NIST: National Institute of Standards and Technology	§9.4.3.2.2(A)
PEC: Passive Engineered Control	Appendix A, Table A-3
PEL: Permissible Exposure Limit	§3.3.1
PHA: Process Hazards Analysis	§3.3.1
RAI: Request for Additional Information	§9.5
QC: Quality Control	§9.4.3.2.2(A)
TEDE: Total Effective Dose Equivalent	§9.4.3.2.1
UF6: Uranium Hexafluoride	Appendix A
UL: Underwriters Laboratories	§7.4.3

- (vi) The following terms included in the Glossary are no longer used in the March 2000 revision of NUREG-1520 and should be deleted:
- Consequence of Concern
 - Deviation from Safe Operating Conditions
- (vii) Definition of '*Augmented Administrative Control*': NEI recommends that the definition of this term in the May 1999 SRP version be used (see comment above).
- (viii) Definition of '*Baseline Design Criteria*': for clarity, delete the words "...required and acceptable under certain conditions for new processes or facilities..." which are inaccurate and redundant to the 10 CFR 70.64 provision. The first sentence of this definition should read: "...A set of criteria specifying design criteria and management measures that are specified in 10 CFR 70.64..."
- (ix) Definition of '*Process Hazards Analysis*': NEI would suggest NRC consideration of the definition of PHA contained in 29 CFR

1910.119(e). Recommend changing the first sentence to read (in part): "...Evaluation of the identified hazards of operating the plant processes, describes..."

- Chapter 1.1: Facility and Process Description:
 - (i) §1.1.4.3 ('Acceptance Criteria'): 4th paragraph, item (3): acronym SNM should be defined here (first usage of the acronym): "...involving Special Nuclear Material (SNM) to be licensed..."
 - (ii) §1.1.4.3 ('Acceptance Criteria'): 4th paragraph, item (4): this paragraph was relocated from §1.2.4.3(3) of Chapter 1.2. It does not correspond at any 'Area of Review' in §1.1.3, which should, therefore, be expanded accordingly.
 - (iii) §1.1.6 ('Evaluation Findings'): 4th paragraph, item (3): 1st paragraph, 2nd sentence: acronym SER should be defined here (first usage of the acronym): "...inclusion in the Safety Evaluation Report (SER) prepared for the entire..."

- Chapter 1.2: Institutional Information:
 - (i) §1.2.4.2 ('Regulatory Guidance'): Items (3) and (4): use the acronym SNM in three locations, as the term was defined earlier in §1.1.4.3 of this chapter.

- Chapter 1.3: Site Description:
 - (i) §1.3.1 ('Purpose of Review'): Capitalization of term in 2nd sentence: "...ISA Summary..."
 - (ii) §1.3.5.1 ('Acceptance Review'): capitalize, for consistency (e.g. with §1.3.5.2), the terms 'Environmental Report' and 'Emergency Plan'.
 - (iii) §1.3.5.2 ('Safety Evaluation'): the information presented in the Site Description is not a summary of the contents of the ISA Summary, Environmental Report, the Emergency Plan and other documentation. To use the terminology of, for example, §1.3.5.1 or §1.3.3, the contents of this report should only be consistent with, but not a summary of, the contents of these reports.
 - (iv) §1.3.5.2 ('Safety Evaluation'): editorial comments: 3rd sentence, use the terms referred to elsewhere in this chapter. Revise to read: "...response to the staff's review of the Environmental Report, Emergency Plan and ISA Summary..." capitalize terms
 - (v) §1.3.6 ('Evaluation Findings'), paragraph 2, last sentence: capitalize terms for consistency elsewhere in this chapter.

- Chapter 2: Organization and Administration:

- (i) §2.5.2 ('*Safety Evaluation*'), 2nd paragraph, last sentence: define SER (first occurrence of this acronym in Chapter 2)