

Response to Comments - Chapter 1 - Facility and Process Description

Comment No.	Source	Comment	Disposition
1.1-1	NEI	Recommend that facility and process description be limited to a narrative discussion satisfying the general objective.	Agree to clarify the limits of the requested presentation, but expect that techniques other than narrative should be employed, such as tables, drawings, etc. Item (v) proposed by NEI will be included in acceptance criteria.
1.1-2	NEI	Proposes a rewrite of section 1.1 with changes in text at various paragraphs.	Will incorporate most of NEI recommendations.
1.2-1	NEI	Asserts that the acceptance criteria requesting "...a description of each activity or process in which SNM will be used is excessive and inappropriate for inclusion in the institutional information chapter. Only a summary, non-technical narrative description of SNM processes is required."	Will clarify that a summary, non-technical narrative description is adequate in this chapter.

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1.2-2	NEI	States that 1.2.4.3(1) incorrectly "...requires demonstration '...that there is no controlling foreign interest'." Also states that there is no requirement in the Part 70 rule to describe "...primary ownership and relationships to other components of the same ownership."	Agree that do not need to demonstrate no controlling foreign interest, but need only to identify any such interest. Will correct. Regarding ownership and relationships to other components, 70.23(a) requires that applicant "...appears to be financially qualified to engage in the proposed activities...", and 70.22(a)(8) states that "...the Commission may request the applicant to submit information with respect to his financial qualifications." Staff believes that information of the type requested is relevant to the assessment of financial qualifications. Will change the phrase "explicitly described" to "explicitly identified."
1.2-3	NEI	Proposes a rewrite of this section 1.2 with changes in text at various paragraphs.	Will incorporate most of proposed revisions.
1.3-1	NEI	Resolve language that sometimes calls for information from the ISA Summary, and sometimes from the ISA.	Agree. Will resolve such occurrences to show that information will be based on information from the ISA Summary.

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1.3.2	NEI	Object to inclusion of design basis information in this section. Should be discussed and justified only in ISA Summary.	Disagree with first objection, agree with second. Design basis information, in summary form and content, is to be included in Chapter 1 of the application (thus addressed in Chapter 1 of the SRP) for purposes of management level review by those NRC or public personnel who have a legitimate interest in the applicant's safety program fundamentals but who do not have the need or responsibility for the formal review and safety findings. The information in this chapter is to be only the "bottom line" bases, the results derived from the discussion and justification found in the ISA Summary.
1.3.3	NEI	Proposes a rewrite of section 1.3 with changes in text at various paragraphs.	Agree with most revisions for clarification and focus on ISA Summary. Will make appropriate changes for this purpose and to accomplish the changes explicitly discussed in comments 1.3.1, 1.3.2 above