

From: Amy Cabbage } NRR
 To: Benner, Eric }
 Date: 11/30/01 2:28:29 PM
 Subject: Eric:

Eric:

We got the following e-mail from Larry parme in preparation for the GA meeting. I am planning to give a very brief status of the commission papers (i.e. mine is with the commission and should be publicly available in the next few weeks and addresses the following topics, yours should go to the Commission in the next two weeks) Do you want to say anything more about licensing approach? See the bolded text below from Larry. Agenda is attached too for your info See you there!

Amy

from larry parme:

General Atomics

We had agreed that a series of questions would provide a framework on
 >the issues

In their meetings with NRC this past year, Exelon had raised a series of issues of generic interest to the vendor or operator of any small modular reactor and gas-cooled modular reactors in particular. The issues of primary interest to GT-MHR and that we would like to get a summary of their status are listed below.

Requirements on annual fees in 10CFR171. Specifically, whether allowance can be made for the fact that it is envisioned that multiple reactor modules will act as one plant.

A related question is the number of licenses required in 10CFR50.75. Can multiple modules be licensed as one plant (i.e., 1 license for multiple modules)

Has NRC developed a position on PBMRs question related to operator staffing requirements in 10CFR50.54(m). GT-MHR also believes the staffing requirements of our concept would be considerably reduced from those of a convention LWR.

Perhaps most importantly, GT-MHR is interested in developing NRC positions on the licensing approach proposed for usage by PBMR.

- * **Do the top-level regulatory criteria reflect a complete set of quantifiable statements on required public protection?**
- * **Does NRC agree with or have alternate suggestions for the applicable frequency range of the top-level regulatory criteria?**
- * **Does NRC agree with the use of the risk informed methods for determining licensing bases for gas-cooled reactors (i.e., selection of LBEs, safety classification, and establishing lower-level criteria)?**

Hope this will help you in preparing for next week's meeting I will telephone you this afternoon.

Larry

C-3

Laurence L. Parme
Manager: GT-MHR Safety and Licensing
General Atomics Co.
2237-S Trinity Drive (3rd Flr)
Los Alamos, New Mexico 87544