

**From:** Goutam Bagchi > NRG  
**To:** Nanette Gilles  
**Date:** Mon, Aug 20, 2001 11:27 AM  
**Subject:** Fwd: Re: PBMR Pre-application Review

Nan,  
I am forwarding this email from my Division Director, Jack Strosnider, because, he has suggested an internal meeting with your group - Future Licensing Project Office.  
Please also read the email I had sent to Jack.

I shall support any meeting/discussion you can arrange to discuss the issue of developing General Design Criteria for the next generation of reactors.

Thank you,  
Goutam  
301-415-3305

**CC:** Farouk Eltawila; Jack Strosnider; Marsha Gamberoni

6/34

**From:** Jack Strosnider *NRR*  
**To:** Farouk Eltawila; Goutam Bagchi  
**Date:** Thu, Aug 16, 2001 4:30 PM  
**Subject:** Re: PBMR Pre-application Review

Goutam,

this seems to me like it would be a good subject to get in front of the Risk Informed Licensing Panel and the Risk Informed Steering Committee. First, however, I'd suggest you discuss it with the FLO staff. If they're aligned, we can try to get it on the RILP and RISC agenda.

By the way, I personally think that a lot of the GDC are already written in a way that allows risk informed and performance based approaches. Look at STP as an example of where risk informed approaches were applied without exemptions to the GDC. Of course there are some areas that are more prescriptive and their modification may be appropriate.

thx,

Jack

*NRR*  
>>> Goutam Bagchi 08/16/01 10:49AM >>>

I attended the public meeting between Exelon and NRC for short periods of time on yesterday and today. The design is still in a very preliminary stage, so the exchange of ideas and concepts is, and should be, very helpful to the NRC staff.

One discussion topic had to do with "Methods of Safety Classification and Development of Regulatory Design Criteria." Exelon is using risk assessment reasoning to develop and propose a General Design Criteria (GDC) and Safety Classification process to the NRC staff. I understand that stake holder input is important in this process, but I see a great potential for over looking and missing GDCs based on other safety principles, if the proposed GDCs come from the applicant - Exelon, the applicant.

I think that we are probably missing a great opportunity, if we do not set up a group charged with developing GDCs for new generation of reactors independent of the parties that the NRC would directly regulate. NRC is mandated to ensure public safety, so the appearance of developing Regulatory Design Criteria based on the applicant's proposal ought to be avoided. I am sure that we can set up a robust process that will admit stake holder input and enhance public confidence in this process.

I recognize that we do not have detailed information of the proposed designs, nevertheless, the broad safety principles that are captured in the GDCs can be formulated and then modified as appropriate with stake holder input.

On an aside, Exelon has proposed regulatory treatment of various safety class components on a case by case basis - not all safety class components needs to be able to withstand earthquakes, for example.

Thank you,  
Goutam  
301-415-3305

**CC:** Bill Bateman; David Terao; Gene Imbro; Jose Calvo; Pao-Tsin Kuo; Stephanie Coffin