

March 12, 2003

The Honorable Richard A. Meserve
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Chairman Meserve:

SUBJECT: DRAFT REVIEW STANDARD, RS-002: "PROCESSING APPLICATIONS FOR EARLY SITE PERMITS"

During the 500th meeting of the Advisory Committee on Reactor Safeguards, March 6-8, 2003, we met with representatives of the NRC's Office of Nuclear Reactor Regulation (NRR) to discuss the staff's draft Review Standard for processing applications for early site permits (ESPs). We also had the benefit of the document referenced.

CONCLUSIONS

The draft ESP Review Standard is appropriate for review of early site permit applications and will accommodate the industry's proposed use of the Plant Parameter Envelope (PPE) concept.

DISCUSSION

The staff has modified the appropriate sections of the Standard Review Plan (SRP) to make use of existing guidance to the extent possible. The modifications generally consist of elimination of the contents of the SRP that are not applicable to ESP and revisions to bring the SRP up to date. In general, references to plant layouts or design details are deleted and replaced with a statement of the form: "... [specify these details for] a nuclear power plant or plants of specified type that might be constructed on the proposed site to the extent this information is available." Some review issues that require knowledge of items that are design-specific, such as source terms, will be accommodated by bounding values specified in the PPE portion of the application and confirmed at the Combined License (COL) stage. For already approved sites with existing plants, most of the review areas called for by the standard will have already been sufficiently addressed. The applicant will merely need to verify, compile, and docket these review areas.

Although the sections of the current SRP that deal with siting issues require a specific design, the proposed ESP standard recognizes that by specifying parameters such as distance to the exclusion area boundary, source term characteristics, and relative concentration (χ/Q) values in the PPE, it will be possible to demonstrate that a plant that fits within the PPE can be safely located on the site. The PPE can also accommodate the need to assess incremental

environmental impact to ensure that it is acceptable. We believe that granting ESP based on the guidance of this proposed review standard will assure adequate protection and acceptable environmental impact when a plant is built on the approved site.

Sincerely,

/RA/

Mario V. Bonaca
Chairman

Reference:

U.S. Nuclear Regulatory Commission Review Standard (Draft) RS-002, "Processing Applications for Early Site Permits," Draft for Interim Use and Public Comment, December 23, 2002.