

OCT 26 1982

TO ALL POWER REACTOR LICENSEES/PERMIT HOLDERS, APPLICANTS FOR CONSTRUCTION PERMITS

Subject: Guidance for Implementing Standard Review Plan Rule (Generic Letter No. 82-20)

Gentlemen:

On March 10, 1982, the Commission approved a final rule 10 CFR 50.34(g), "Conformance with the Standard Review Plan (SRP)." This rule requires power reactor applications docketed after May 17, 1982, to include an evaluation of the facility against the acceptance criteria of the Standard Review Plan (NUREG-0800).

The staff has prepared for public comment the enclosed guidance (NUREG-0906) for licensees to assist in complying with the rule. The guidance document is intended as an interim measure until the "Standard Content and Format Guide for Safety Analysis Reports, Regulatory Guide 1.70," is revised to reflect the requirements of the new rule, at which time the guidance in NUREG-0906 would be incorporated into Regulatory Guide 1.70.

The guidance document has the following major features:

- (1) It identifies the locations in the Safety Analysis Report (SAR) for providing the evaluation required by the SRP rule and provides a suggested tabular format for identifying the specific areas of design, analysis, and procedure that are different from the Standard Review Plan. The table includes an identification and summary description of the differences, and a reference to the specific sections of the SAR in which the differences are discussed and evaluated.
- (2) For applicants subject to the rule, it modifies the present guidance contained in Regulatory Guide 1.70 that they should provide a discussion in the SAR of their conformance with all applicable Regulatory Guides (SAR Chapter 1.8). The appropriate Regulatory Guides are cited in the acceptance criteria for each individual section of the SRP. Thus, this section (Chapter 1.8) of the SAR would be redundant to the evaluation now required by the SRP rule and an unnecessary burden on applicants.
- (3) It reaffirms that conformance with the SRP, per se, is not a regulatory requirement, but that the specific acceptance criteria of the SRP define methods acceptable to the staff for satisfying the relevant regulations. However, the guidance documents notes that in some instances the SRP acceptance criteria are identical to the requirements of the regulations. Guidance on how to handle this type of difference from the SRP acceptance criteria is included.

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- (4) It provides examples of evaluations of differences from the SRP that the staff considers to be acceptable in technical scope and detail.

Comments on NUREG-0906 are due by December 20, 1982.

Sincerely,

Original signed by
Darrell G. Eisenhut

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Enclosure: *See jacket*
As stated

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