

August 20, 1984

CF

TO ALL LICENSEES OF OPERATING REACTORS AND APPLICANTS FOR OPERATING LICENSE

Gentlemen:

SUBJECT: SCHEDULING GUIDANCE FOR LICENSEE SUBMITTALS OF RELOADS THAT INVOLVE UNREVIEWED SAFETY QUESTIONS (Generic Letter 84-20)

The purpose of this letter is to provide guidance on the scheduling of licensee submittals on any reload analyses that contain an unreviewed safety question or require a revision to the Technical Specifications (TS), and which therefore require approval and/or a license amendment from NRC prior to restart. When the submittals involve the reanalysis of FSAR Accident Analysis Chapter transients and accidents, and these analyses are not based on NRC-approved analysis models and methods, they should be submitted at least six months prior to the date of issuance (restart date) of the needed license amendment or design approval.

In many cases, the analyses of transients and postulated accidents submitted in support of the reloads have been performed using analysis models and methods that have not yet been approved by NRC. Full confirmation of the acceptability of such models and methods frequently has required more review time than available prior to the needed date and has resulted in interim findings subject to later confirmation.

In order to avoid possible delays in restart, sufficient time should be allowed in the reload review process for the staff to make a finding of acceptability on previously unapproved analysis models and methods. We therefore provide the following for your guidance:

1. Any licensee planning to submit reload analyses based on analysis models and methods that are not yet approved by the NRC staff should submit the models and methods at least six months prior to the date that a license amendment is needed to authorize restart.
2. For a licensee that submits reload analyses less than six months prior to the date that a reload license amendment is needed based on models and methods that are not approved by the staff, the staff cannot assure an approval can be given within the six month period, and we strongly suggest that justification for restart should be primarily based on previously approved analyses or analysis models and methods.

As this letter does not contain any requests for information, an Office of Management and Budget clearance number is not required.

Darrell G. Eisenhut

Darrell G. Eisenhut, Director
Division of Licensing

*PREVIOUS CONCURRENCE SEE DATE

ORAB:DL*
MFairtile:dm
6/27/84

ORAB:DL*
JZwolinski
6/28/84

ELD*
BShields
7/2/84

C:ORAB:DL*
GHolahan
7/02/84

AD/SA:DL*
DCrutchfield
7/17/84

D/DSI RB
RBernero
8/17/84

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D/DSI
RBernero
8/17/84

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