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Ms. Cindy Bladey
Chief, Rules, Announcements, and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

7/11/2013
78 FR 41810
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Comments on Proposed Revisions to Light Load Handling System and Operations (78 Fed. Reg. 41,810, dated July 11, 2013; Docket ID NRC-2013-0148)

Ms. Bladey:

AREVA NP Inc. (AREVA) appreciates the opportunity to provide comments on the proposed draft Revision 4 of subsection 9.1.4 to NUREG-0800, "Standard Review Plan (SRP) for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," submitted to the *Federal Register* on July 11, 2013. AREVA requests that the U.S. Nuclear Regulatory Commission (NRC) seriously consider the concerns addressed in this letter.

AREVA commends the NRC for proposing clarifications to the existing text in subsection 9.1.4 of the SRP, "Light Load Handling System and Operations." These changes primarily reflect operating experience associated with IE Bulletin 84-03, "Refueling Cavity Water Seals." The revisions also incorporate lessons learned from NRC reviews following Revision 3 of this chapter, dated May 2007. Revisions to the existing text that improve the efficiency, reliability, and clarity of the staff's review processes are consistent with the NRC Principles of Good Regulation.

AREVA is in agreement with and endorses the comments submitted by the Nuclear Energy Institute (NEI). AREVA supports the overall goal of the proposed changes in their intent to clarify and provide additional guidance to the staff for reviewing applications under both Part 50 and Part 52 of Title 10 of the *Code of Federal Regulations* (10 CFR) with respect to light load handling systems (LLHS) and refueling operations. AREVA is in favor of the NRC's claim that the draft SRP positions will not be imposed or applied to existing licenses and regulatory approvals, and thus do not invoke the Backfit Rule or inconsistencies with issue finality provisions. AREVA understands that current or future applicants are not protected under backfitting or issue finality, and applications submitted six months after acceptance would be subject to the changes in Section 9.1.4.

The NRC noted in "SRP Section 9.1.4, Description of Changes" that clarifications were added throughout the proposed SRP section to include both "permanent and temporarily stored fuel" in the definition of stored fuel. AREVA considers this wording ambiguous. The NRC should clearly define the terms "permanent stored fuel" and "temporarily stored fuel" prior to implementing their use in Revision 4 of Section 9.1.4.

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E-RIDS= ADM-03
Add= J. DeGange (JLD 4)
J. Colacino (JXC 1)

AREVA appreciates the staff's attention and consideration in reviewing these comments. If you have any questions related to these comments, please contact Ms. Jennifer Musgrave, Product Licensing Manager for Regulatory Affairs. She may be reached by telephone at 434-832-2725, or by email at Jennifer.Musgrave@areva.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pedro Salas', is written over a large, loopy scribble that also contains the word 'Sincerely'.

Pedro Salas, Director
Regulatory Affairs
AREVA NP Inc.