

Enclosure 3: Additional comments on previously endorsed sections of NEI 98-03 Revision 1 for NEI consideration

Comment #	location	Comment
1	Section 1	Recommend removing reference to Figure 1 since it is not introductory material.
2	Section 2, paragraph 2	Consider referencing NRC Information Notice 96-17 dated March 18, 1996, to provide greater depth of background on events at Millstone and Haddam Neck.
3	Section 3	Consider including the frequently used terms for controlled information such as “sensitive”, “sensitive unclassified non-safeguards information (SUNSI)” and “security-related information.”
4	Section 3.3, 1st bullet point	"Not intended or expected to be updated for the life of the plant" is very general and open to interpretation. A few examples may help the reader to better understand those instances where no updating is ever required (for example the location of the facility, pre-operational testing, etc.).
5	Section 3.5, paragraph 2	The sentence "per the requirements of Section X.A of the applicable Part 52 design certification <u>appendix</u> ," is inconsistent with the term " <u>design certification rule</u> " in the remainder of the document. Consider harmonizing. The term “Part 52 appendix” would be appropriate since it is Part of 10 CFR Part 52.”
6	Section 6.2, footnote 1	Is a footnote the best method to communicate that similar language appears in 10 CFR Part 52? May want to make it part of the regular text.
7	Section 8	Recommend deleting the word "needlessly" from the third sentence in the second paragraph.

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8	Section 9, paragraph 1	The first paragraph states "If the licensee discovers a discrepancy between the facility and its description in the UFSAR, the licensee should address the discrepancy in accordance with its corrective actions program under 10 CFR Part 50, Appendix B." Comment: 10 CFR Part 50, Appendix B only applies to Safety Related and important to safety structures, systems and components (SSCs). A discrepancy between the facility and the UFSAR applies to the whole plant; therefore, in some cases discrepancies to the UFSAR may apply to non-safety related SSCs and not to safety related or important to safety SSCs. NEI should consider clarifying this paragraph related to the scope of discrepancies found in the facility that do not match up with the UFSAR.
9	Section 9	Recommend that this section should be clarified to indicate that the NRC regulations and plant technical specifications related to operability must be met during the evaluation of a discrepancy between the facility and its description in the UFSAR. Therefore, the second sentence of this section should be revised as follows: If evaluation of the discrepancy results in the identification of a nonconforming or degraded plant condition that <u>might</u> may impact the operability of the associated structures, systems and components, the nonconforming or degraded condition <u>shall</u> should be addressed in accordance with <u>the NRC regulations and plant technical specifications</u> . Regulatory Issue Summary 2005-20, <u>references the NRC inspection manual chapter that describes operability determinations and functionality assessments for resolution of degraded or nonconforming conditions adverse to quality or safety</u> .
10	Section 6.1.3	This section implies the delegation of the acceptability of safety analyses to the licensee. Therefore, the second sentence should be revised to read as follows: NRC-requested analyses and evaluations must be reflected in UFSAR updates <i>only</i> if, on the basis of the results of the requested analysis or evaluation, the licensee determines that the existing design bases, safety analyses or UFSAR description are either not accurate or not bounding or both.

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11	Section 6.1.4, paragraph 2	In addition to identifying changes to the UFSAR as a result of NRC bulletins and generic letters, the NEI may wish to reference other generic NRC communications by including the following sentence at the end of this section: "The licensee may also wish to consider other generic NRC communications (such as regulatory issue summaries and information notices) that might later result in the need to update the UFSAR".
12	Section 6.1.4	Consider discussing the treatment of information added or updated considered "sensitive", "SUNSI" or "security related."
13	Section A 3, 6th bullet point of first list	<p>There is a footnote as follows: "While data and information supporting the original plant design bases for natural and man-made phenomena may be designated as historical, the associated design bases themselves should not. This is because the original design bases continue to be part of the overall design bases for the facility, and new information may warrant their update".</p> <p>Comment: Move Footnote text into body of the document. This information is too important to leave in a footnote, which may be overlooked by a reader. NB: This was also marked in Enclosure 2 as a change to the draft text.</p>

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14	Section A 4.2	This section of the Nuclear Energy Institute (NEI) guidance indicates that simplified schematics may be substituted for plant drawings in the updated final safety analysis report (UFSAR). The NRC staff relies on UFSAR information in the electronic library for the NRC Operations Center in response to plant events. The NEI guidance should perhaps indicate that licensees may wish to arrange to make available electronic versions of the plant drawings for the NRC Operations Center if such information is removed from the UFSAR. More generally, consider including a discussion of the fact that the reduction of information in one area might cause an additional resource burden in another area.
15	Section A 4.3	Section A 4.3 states "By relying on information "incorporated by reference," licensees may simplify their UFSARs by removing information that is duplicated in separate, controlling program documents such as the Emergency Plan, Offsite Dose Calculation Manual, Fire Protection Plan and Fire Hazards Analysis Report..." Consider revising the highlighted to state, "...Fire Protection Plan, Fire Hazards Analysis,..."
16	Section A 4.3	Section A 4.3 states "Licensees should clearly identify in the UFSAR text the document or portion thereof to be incorporated, and state that the document or portion thereof is "incorporated by reference" in the UFSAR." Consider adding that the references' date and revision (if available) should also be included when clearly identifying the incorporated reference.
17	Section A 6, paragraph 3	"Description" should be plural.