

D890119

The Honorable Lando W. Zech, Jr.  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Chairman Zech:

SUBJECT: DRAFT FINAL RULE ON STANDARDIZATION AND LICENSING REFORM,  
10 CFR PART 52, "EARLY SITE PERMITS; STANDARD DESIGN  
CERTIFICATIONS; AND COMBINED LICENSES FOR NUCLEAR  
POWER PLANTS"

During the 345th meeting of the Advisory Committee on Reactor Safeguards, January 12-14, 1989, we reviewed the Draft Final Rule on Standardization and Licensing Reform transmitted January 4, 1989, which would provide for early site permits, standard design certifications, and combined licenses for nuclear power plants. We had the benefit of briefings by the NRC staff during a meeting of our Subcommittee on Improved LWRs on January 10, 1989 and during the full Committee meeting. We also had the benefit of the document referenced. The ACRS provided comments on this subject in reports of August 12, 1986, October 15, 1986, and June 9, 1988.

Since we have not yet seen the final version of the Draft Final Rule, the public comments, or the Statement of Considerations, our comments below may be subject to revision or amplification after we have seen the final version of these documents.

We recommend that the various types of designs be named and defined more clearly than in the proposed rule. We suggest the following:

- . Improved LWR Designs - for LWR plant designs that contain improvements beyond those designs of LWR plants licensed for construction prior to the effective date of this rule.
- . Advanced LWR Designs - for LWR plant designs that differ significantly from improved LWR designs or use simplified inherent passive, or other innovative means to accomplish safety functions to an extent significantly greater than in improved LWR designs.
- . Advanced Non-LWR Designs - for advanced plant designs using other than light water as moderator or coolant.

The information required for design certification is identified in Section 52.47(a)(2). This section includes a requirement for the submittal of information sufficiently detailed to permit the preparation of procurement specifications and construction and installation specifications. The staff's review of this material can be performed most efficiently and with greater understanding if this large body of information is available in final form, i.e., the procurement specifications and the construction and installation specifications. We recommend that the rule be expanded to require submittal of these documents.

The references in Part 52 to the responsibility of ACRS for review should be made consistent with the provisions of the Atomic Energy Act of 1954, as amended.

We will continue to follow and review the development of this rule along with the Statement of Considerations and advise you accordingly.

Sincerely,

Forrest J. Remick  
Chairman

Reference

Memorandum dated January 4, 1989 from Steven Crockett, Office of the General Counsel, NRC, to Herman Alderman, ACRS, transmitting Draft Final Rule on Standardization and Licensing Reform

→