

FLORIDA POWER CORPORATION

ST. PETERSBURG FLORIDA

December 20, 1971



Mr. Peter A. Morris, Director
Division of Reactor Licensing
United States Atomic Energy Commission
Washington, D. C. 20545

Dear Mr. Morris:

The need for close coordination between your staff and the utility from the earliest possible date is indicated by your letter of December 8, 1971.

If we wait until formal licensing procedure begins with the applicant's filing for the construction permit you and ourselves have lost the first six to eight months in time. Informal contact is essential but we have no DRL staff personnel assigned as you have no application. Possibly the applicant and you could arrange by request to establish from the first the proposed contacts for such coordination efforts so as to facilitate beginning with filing on an organized working relationship basis.

Another concern is the importance of early site evaluation activities traditionally called "ologies" which are now so critical to our decision process. We must use your guidance and leadership in assisting us in early site problem identifications if we are to reduce evaluation time while supplying increasing design information at the time of application submittal.

Early assignment of contact personnel is again vital to this effort. We might suggest that you consider a staff assignee to each nuclear utility in addition to the team assigned to each applicant. This single utility contact would be the entrance for necessary liaison with your operation prior to formal procedure.

Please accept our congratulations on your initiation of this very worthwhile undertaking on behalf of the nuclear future of our industry. We look forward to success and are dedicated to it.

Sincerely,

A. P. Perez

A. P. Perez
President

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Mr. Thomas J. Brosnan
Vice President and Chief Engineer
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Dear Mr. Brosnan:

At our meeting on November 18, 1971, at which the Director of Regulation, Mr. Muntzing, expressed the intent of the Commission not to accept applications, in the future, that were inadequate or incomplete, I gave some examples of deficiencies in applications received within the last year or so. A request was made at the meeting to provide these examples in writing.

In response to this request I am sending you copies of the notes from which I spoke. As I stressed at the meeting, there was not meant to be any particular priority attached to the order in which the items were mentioned, nor were the lists meant to be complete or definitive in any sense. Neither were the examples meant to be carrying. They were presented then and are provided now as hopefully helpful guidance to you in providing applications that can be processed expeditiously.

Questions and discussion brought out other points, our positions on which are the following:

CP applications should be based on preliminary designs, not just conceptual designs.

OL applications should be based on final designs, not anything less.

Technical specifications are an important part of the entire design and safety analysis process. Since they become a part of the license, their nature and their bases should be an integral part of the developmental process of plant design and proposed operation. Both CP and OL applications should include sections on technical specifications. At the CP stage, certain limits may not be able to be specified;

limits that will need specification in which numerical limits will be At the OL stage the actual technical - which should be an integral part of

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