



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 6, 1980

MEMORANDUM FOR: George W. Knighton, Chief, Research and Standard Coordination
Branch, Division of Safety Technology

FROM: Robert L. Baer, Chief, Safety Program Evaluation Branch,
Division of Safety Technology

SUBJECT: COMMENTS ON PROPOSED REVISION 1 OF REGULATORY GUIDE 1.23,
"METEOROLOGICAL PROGRAMS IN SUPPORT OF NUCLEAR POWER PLANTS"

I briefly reviewed the subject guide, with particular emphasis on the implementation section. I believe there may be an inadvertent ratchet that could severely impact licensing review schedules. This is explained below.

The implementation section states that the guides "...will be used in the evaluation of all applications that are docketed after, or are in review at, issuance of this guide." The guide, in part, deals with the siting of meteorological instruments, the data recorders, and system accuracy. I gather that satisfying the "Regulatory Position" portion of the guide would require some upgrading of instrumentation currently in use. The potential implementation difficulty occurs because the proposed guide refers to Section 2.3 of Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Report for Nuclear Power Plants - LWR Edition" regarding minimum data requirements. That section of the standard format states that the FSAR should present at least two, and preferably three or more, consecutive years of data.

The implication is that for OL applications currently under review, (and those submitted in the near future) that the meteorological instrumentation would have to be upgraded. Then at least two years of data would have to be obtained before we would complete an on-going OL review or would docket an FSAR for an upcoming OL review. This obviously would have a large, adverse impact on all current and some future OL review schedules.

To avoid possible misinterpretation of the intent of the implementation schedule, I recommend that the following new paragraph be inserted between the second and third paragraph of the Implementation Section of the subject guide.

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"However, for the purposes of providing one annual cycle of data for a PSAR review, data obtained with an onsite meteorological program which is in accordance with the guidance presented in the original version of Regulatory Guide 1.23 will be acceptable for a period of two years after issuance of this guide. Likewise, for the purposes of providing a minimum of two consecutive annual cycles of data for a FSAR review, data obtained with an onsite meteorological program which is in accordance with the guidance presented in the original version of Regulatory Guide 1.23 will be acceptable for a period of three years after issuance of this guide."



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