

# Bechtel Power Corporation

Engineers—Constructors

Fifty Beale Street

San Francisco, California

Mail Address: Box 3965, San Francisco, CA 94119



January 14, 1981

U.S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, D.C. 20555

Attention: Dr. Harold R. Denton, Director

Subject: Draft SER Approach to Nuclear  
Facility Licensing Review

Dear Dr. Denton:

Several Bechtel projects have recently been involved in various experimental approaches to the NRC review of Final Safety Analysis Reports (FSAR). In each case, we have seen evidence of improvement to the licensing process and we hope that the Commission will continue to explore and support such approaches. The purpose of this letter is to provide our observations on one of these approaches which has been carried to the point of completion of the review of a portion of the FSAR.

This approach, proposed by the NRC Mechanical Engineering Branch (MEB) and employed on the Susquehanna and Grand Gulf projects, involved the issuance of a Draft Safety Evaluation Report (DSER) that identified FSAR open issues and a follow-up meeting to resolve these issues. The objective of this approach was to resolve open issues without resorting to additional rounds of formal questions and responses. Since Grand Gulf Nuclear Station (GGNS) has completed one DSER cycle, the remainder of this letter will address our reaction to the GGNS experience specifically, although the comments apply to the general use of the DSER.

In general we found that the objective of the DSER approach was effectively realized. Several benefits resulting from the use of the DSER by the MEB are evident. Specifically:

1. Face to face discussions between the NRC and the applicant subsequent to the DSER issuance, were much more efficient than the written question and answer cycle. Questions and ambiguities were clarified and proposed resolutions were clearly understood.
2. The approach provided for early resolution of most issues allowing concentrated efforts on resolution of the remaining issues.

Boo1  
S/O  
ADD.  
H Denton

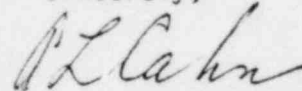
C 8101210382

U.S. Nuclear Regulatory Commission  
January 14, 1981  
Page two

3. Generic issues were brought to plant specific interpretation and resolution earlier in the review.
4. The review schedule was accelerated when compared to the normal question and response cycle. The MEB portion of the GGNS Safety Evaluation Report will probably be brought to final draft form several months earlier than scheduled and with fewer open issues.

In summary, this experimental approach toward resolution of open issues is far more expedient than the present formal question and response approach. We recommend the adoption of the DSER approach by all branches of the NRC in future reviews of Final Safety Analysis Reports.

Sincerely,



A.L. Cahn  
Manager of Engineering  
Thermal Power Organization

ALC:nt1