

STONE & WEBSTER ENGINEERING CORPORATION

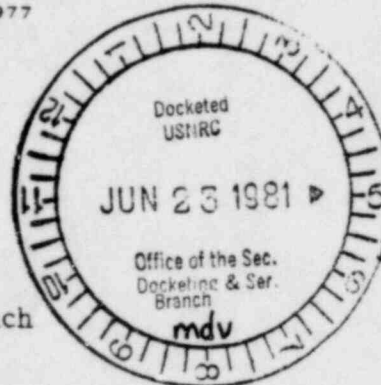
245 SUMMER STREET, BOSTON, MASSACHUSETTS

ADDRESS ALL CORRESPONDENCE TO P.O. BOX 2325, BOSTON, MASS. 02107

W. U. TELEX: 94-0001
94-0977

BOSTON
NEW YORK
CHERRY HILL, N.J.
DENVER
CHICAGO
HOUSTON
PORTLAND, OREGON
SAN DIEGO
WASHINGTON, D.C.

DESIGN
CONSTRUCTION
REPORTS
EXAMINATIONS
CONSULTING
ENGINEERING



June 18, 1981

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Attention Docketing and Service Branch
Washington, DC 20555

Dear Sir:

NRC TASK FP 907-4, MARCH 1981
GUIDANCE ON PREPARING A LICENSE APPLICATION
TO STORE SPENT FUEL IN AN ISFSI

DOCKET NUMBER
PROPOSED RULE PR-Misc Notice
Reg Guide

We are pleased to submit our comments on your "For Comment" draft of the subject proposed regulatory guide.

This regulatory guide, defining the contents of a single-stage licensing application for an ISFSI, although highly desirable in intent, conveys a requirement relating to scope that is far in excess of what can be provided in an application without having completed detailed engineering and design, and without having purchased equipment. Some of the specific areas of concern are in the following chapters:

Chapter 4, in the second paragraph, states that "the initial SAR is expected to be complete and comparable in scope and detail to the final SAR for facilities licensed under 10 CFR Part 50." Although we agree with the intent of making the SAR as complete as possible, providing an FSAR level of detail is impractical, primarily because at this stage in the ISFSI design development, purchasing of equipment will be just beginning. We suggest that, in areas such as these, submittal of information be limited to "complete functional specifications rather than to actual design drawings and specifications." This suggestion conforms with the single-stage licensing guidance in the NRC "Statement on Standardization of Nuclear Power Plants" dated August 31, 1978.

Chapter 6 cites ANSI N299-1976 as a guide to be followed in the establishment of administrative and management controls. This standard, which was written for control of safety-related (as well as other) functions, requires step-by-step procedures for operation. The formal definition of all actions by an operator may be impossible to relate to in a preliminary design phase, especially before selection of specific vendors' equipment. We again suggest that functional specifications of operations be described rather than detailed step-by-step procedures.

8107070321 810619
PDR REGGD
03. XXX C PDR

Acknowledged by card

H002
S1/0
6/23/81 mdv
I, All
Comment

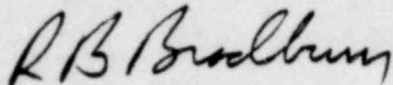
June 19, 1981

Chapter 14, which refers back to Chapter 10 of the SAR for commitments to license conditions and operating controls and limits, requires specification of such subjects as setpoint limits on monitoring instruments and controls on personnel access. This implies a level of completion far beyond that which can be expected before design and engineering has been essentially completed. We suggest that this type of SAR information be in the form of functional specification of controls and limits rather than of final vendor and design specific operational details.

In summary, we suggest that the draft regulatory guide be rewritten to more clearly identify the intent of a single-stage licensing procedure consistent with preparation of an application and an SAR prior to having a completed final design. As discussed in the above-mentioned "Statement on Standardization," verification that actual components and features adequately meet the approved functional specifications would be achieved via a supplementary staff audit function that would occur during construction.

We appreciate this opportunity to assist in the development of this regulatory guide and hope that the above comments will be of use to you in its finalization.

Very truly yours,



R. B. Bradbury
Chief Licensing Engineer

DJC:VMB