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March 4, 1993
ALWR-93-085

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: System 80+™ Review Schedule

Dear Dr. Murley:

ABB-CE has just completed review of SECY-93-041, "Advanced Boiling Water Reactor (ABWR) Review Schedule," which was forwarded to us on March 1, 1993. There are some statements in this document about which I feel compelled to comment. These are related to the priorities among the ALWR reviews and, the potential effect such priorities might have on the review schedule of System 80+. NRC staff and ABB-CE have been pursuing the Final Design Approval for System 80+ consistent with the schedule established in SECY-91-161. Efforts from both organizations have been very diligent and your efforts under such tight schedules are very much appreciated. Written "Requests for Additional Information" have been followed up with meetings and review of draft responses. The main keys to success in this process are our willingness to quickly make design or analysis changes and the desire of both organizations to agree on resolutions at the NRC branch level, without the need for high level management involvement. Once the approach to resolution is established, final responses are submitted on the docket and any material relied upon by the reviewer is printed in the safety analysis report (CESSAR-DC). This aggressive effort has been carried out for more than a year and has been responsible for keeping the review nearly on the schedule in SECY-91-161.

We acknowledge that about three percent of our responses to open and confirmatory items in the System 80+ Draft Safety Evaluation Report involve additional analysis and minor design changes that will be submitted this month and in early April. In addition, analysis of critical structures and seismic margins will be ready for audit by the end of June 1993. This work was identified late in the staff review process and extraordinary efforts were required by both organizations to agree on an approach with the staff and to perform the actual analysis. We will continue to work closely with the staff to bring closure to these issues as soon as possible.

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ABB Combustion Engineering Nuclear Systems

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The industry effort to develop acceptable Inspections, Tests, Analyses, and Acceptance Criteria (ITAACs) has been much more difficult than anticipated and agreement on the pilot ITAACs for the lead plant are more than a year behind the original expected schedule. It is our observation that this delay has been a result of both policy issues on the approach to ITAACs and the availability of design information (e.g., new material needed for the safety analysis report and consistency and cross-reference checks). Based on our participation in the industry review meetings and the development of our own System 80+ ITAACs, it is our belief that ABB-CE is providing a set of ITAACs which address all identified concerns. Eleven prototype ITAACs which incorporate both industry and NRC review comments on earlier versions will be submitted this week for your detailed review and feedback. The remaining ITAACs will be submitted in May and June, along with supporting Tier 2 information.

While we have pursued an aggressive schedule and have worked closely with the staff to keep the review largely on schedule, we have a significant concern with the availability of staff resources for completing the System 80+ review. NRC staff is just now making resources available for the review of fire protection systems. Also, it is our understanding that a reviewer may not be assigned for review of our vulnerability (sabotage) analysis for two or three more months and that reviewers for plant systems have not yet devoted time to the review of our DSER responses. ABB-CE expects that the priority for review of System 80+ should be equal to those for other projects, consistent with the Commission's Staff Requirements Memorandum for SECY-91-334 ("Recommended Priorities for Review of Standard Plant Designs") which stated "Until there is a demonstrated domestic interest expressed for either the GE ABWR or CE System 80+ power stations, staff should assign equal priority in the review of the ABWR, System 80+ and the EPRI Requirements Document for Evolutionary Plant Designs, ...". We are concerned that reviewers are not being assigned to the System 80+ project with "equal priority" and that our review schedule may be unnecessarily delayed.

You informed the Commission some time ago that you would be submitting revised ALWR review schedules in the March 1993 timeframe. On February 18, 1993, the Executive Director for Operations forwarded SECY-93-041 entitled "Advanced Boiling Water Reactor (ABWR) Review Schedule." In this document, it is stated that: (1) the ABWR Final Design approval (FDA) schedule has slipped from December 1992 to some unspecified date (which clearly will not be in 1993) no sooner than 9 months after GE submits its final SSAR amendment; (2) GE has notified the staff that its schedule for resolution of open items will need to be delayed; and (3) the ABWR schedule when finalized may affect the review schedules for the other ALWR projects including ABB-CE's System 80+.

Delays in the schedule have many ramifications including the inevitable added NRC fees and ABB-CE costs; the continued perception by the domestic commercial marketplace that the nuclear industry is moribund; and the importance placed on the FSER by other countries where ABB-CE is competing this year for contracts against foreign competitors.

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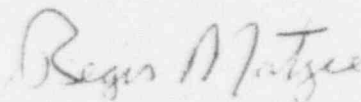
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As reiterated in our March 1, 1993, management review meeting, we are fully committed to completing our commitments for System 80+ on the schedule presented. We have assigned the personnel to ensure that work is completed as soon as possible and we are prepared to make additional personnel available if necessary for future contingencies. We therefore request that increased priority be assigned to completing the staff review of System 80+ and that dedicated reviewers be assigned in the near future to the three areas (fire protection, sabotage and plant systems) indicated above.

I would like to reiterate our recognition of both technical and management efforts to date to keep our review close to schedule. It is our belief that, with some additional reviewer assignments and equitable priority within the staff, the System 80+ review can be completed very close to its SECY-91-161 schedule. Please call me if you have any questions on our program.

Sincerely,



Regis Matzie
Vice President
Nuclear Systems Development

RAM lf

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Commissioner G. dePlanque
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